

Monmouthshire Replacement Local Development Plan

2018-2033

RLDP Deposit

Representations Register

Volume 20 - Site Promoter/Developer

monmouthshire
sir fynwy

1259	Llanover Estates
1281	Barratt David Wilson Homes (LRM Planning)
1301	Melin Homes
1305	Monmouthshire Housing Association (MHA) (LRM Planning)
1428	BB3 Limited
1472	Powells
1461	MCC Estates
1467	Hallam Land Ltd (Boyer Planning)
1480	Edenstone Homes (Boyer Planning)
1493	Vistry Homes Limited
1502	Hallam Land Ltd (Asbri Planning)
1503	Redrow Homes (South Wales) Limited
1519	Barratt David Wilson Homes (Savills)
1533	Manor Farm Partnership
1588	AB INBev UK Limited
1596	Monmouthshire Housing Association (MHA) (Boyer Planning)
1663	Richborough
1683	Llanarth Estates
1685	Stephen Arnell
1692	Edenstone Homes (Highlight Planning)
1694	The Stantonbury Building and Development Company
1736	Bellway Homes
1745	Redi 205 Ltd
1948	Edward Rogers
1965	Monmouthshire Housing Association (MHA) (GJPlanning)
2005	Vistry Group
2280	Candleston Homes (Savills)
2394	Taylor Wimpey (Savills)
2411	Messrs & Mrs Evans
2416	Edenstone Homes (Highlight Planning)
2419	Edenstone Homes (Highlight Planning)
2463	Barwood Development Securities Ltd
2951	Tirion Homes
2952	Candleston Homes (LRM Planning)
2954	Sero
3004	Trustees of the RHT Davies MBE Alltrust SIPP
3028	Coldbrook Estates
3669	Mathern Estates
3780	South Wales Land Developments Ltd
3899	Mr Paul Smith
3929	Robert Hitchins Limited

1259

Llanover Estates

MONMOUTHSHIRE RLDP - DEPOSIT PLAN CONSULTATION – CS0140 LAND SOUTH OF RHYD-Y-MEIRCH, LLANOVER

Settlement Hierarchy and Residential Allocations

Land South of Rhyd – y – Meirch (Candidate Site Reference CS0140) adjoins the settlement boundary of Llanover, a Tier 3 settlement. The Deposit Plan allocates no land for residential development in Llanover. Residential allocations are proposed in the following Tier 3 settlements:

- Devauden – 1 site, 20 homes
- Little Mill – 2 sites, 35 total homes
- Llanellen – 1 site, 26 homes
- Shirenewton – 1 site, 26 homes
- St Arvans – 1 site, 16 homes

In order to effectively assess the role and function of each settlement, an audit of existing services and facilities was undertaken during October 2022 (Sustainability Settlement Appraisal, 2022). This audit was based on 3 principles:

Principle 1 – The level of sustainable transport and accessibility in and around settlements

Principle 2 – The availability of local facilities and services in and around settlements

Principle 3 – The level of employment opportunities in and around settlements

A scoring system was then applied in line with the above principles.

The SSA ranked the settlements based on their Weighted Scores against the 3 Principles. While the combined scores identify all of the above settlements as Tier 3, 'Tiers' associated with each individual principle are also provided and colour coded[1]. See Table 1 below:

Table 1: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles (as set out in the SSA, 2022)

Settlement	Principle 1 (Score as weighted % and Tier)	Principle 2 (Score as weighted % and Tier)	Principle 3 (Score as weighted % and Tier)	Overall Score as weighted % and Tier
Llanover	15.6 - Tier 3	4.7 - Tier 4	10 - Tier 2	**30.3 - Tier 3**
St Arvans	16.7 - Tier 3	6.5 - Tier 4	5 - Tier 4	**28.2 - Tier 3**
Little Mill	16.7 - Tier 3	5.2 - Tier 4	5 - Tier 4	**27.9 - Tier 3**
Llanellen	16.7 - Tier 3	5.3 - Tier 4	5 - Tier 4	**27 - Tier 3**
Devauden	10 - Tier 5	5.9 - Tier 4	7.5 -Tier 3	**23.4 - Tier 3**

[1] Tiers 1 and 2 are green as they achieve the highest scores and are thus the most sustainable in terms of the quantitative appraisal, tiers 3 and 4 are amber as they have a lower level of sustainability and tiers 5 and 6 have the lowest scores and thus are the least sustainable, red.

Settlement	Principle 1 (Score as weighted % and Tier)	Principle 2 (Score as weighted % and Tier)	Principle 3 (Score as weighted % and Tier)	Overall Score as weighted % and Tier
Shirenewton	10 - Tier 5	8 - Tier 3	2.5 -Tier 5	**21.6 - Tier 3**

When compared with those Tier 3 settlements afforded residential allocations in the Deposit Plan, Llanover has the highest overall score. Further, it is the only settlement to meet the criteria for a Tier 2 settlement when being assessed against one of the 'sustainability principles' as a result of the employment opportunities within and around Llanover.

The settlements were also given a **total score** based upon their weighted scores against the 3 principles (above) **and their population size.** Llanover is a comparatively less populated Tier 3 settlement with just 180 dwellings (Census, 2021). Despite this, due to its function as a sustainable settlement, Llanover still scores more highly overall than Devauden and almost equally to Shirenewton:

Table 2: Initial Hierarchy of Settlements based on their weighted scores against the 3 Principles and their Population Size

St Arvans	38.2
Little Mill	37.9
Llanellen	32
Shirenewton	31.6
Llanover	31.4
Devauden	28.4

Therefore, we believe that a proportion of the 9% of housing growth allocated for Tier 3 and 4 settlements within the Deposit Plan should be accommodated at Land South of Rhyd y Meirch, Llanover, in place of the 20 homes proposed at Devauden (Land at Churchfields, Candidate Site Reference: CS0214).

Accordance with RLDP Objectives

The table overleaf identifies how residential development of up to 26 residential dwellings at Land South of Rhyd – y – Meirch would contribute to (and accord with) the relevant RLDP Objectives as per the Strategic Framework of the Deposit Plan.

Objective Number	RLDP Objective	Accordance
3	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and wellbeing. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	A summary has been provided by Historic Landscape Management with regards to the potential impact of proposed development at Rhyd-y-Meirch: **"The site lies within the Llanover Conservation Area with the historic park and garden at Llanover beyond the A4042 road to the east and the Bannau Brycheiniog National Park boundary to the west which is bounded by the Monmouthshire and Brecon Canal.** **The proposed residential development is capable of being integrated into the existing landscape and could be developed to form part of the settlement at Llanover without affecting the character and special interest of the Conservation Area.** **As the site is relatively enclosed on all sides except the open western boundary it is considered that the visual impact will be low. Whilst the western boundary is open, there are no sensitive receptors from the immediate west."** The Preliminary Ecological Appraisal undertaken in 2019 determined the site to have limited ecological value. A green infrastructure-led approach would be adopted for development of the site in accordance with RLDP Objective 3 and wider PPW12 guidance.
4	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.	The NRW Flood Map for Planning shows the site to be wholly within Flood zone 1 for Rivers, Sea, Surface Water and Small Watercourses, For discharge of surface water flows, a sustainable drainage system (SuDS) will be incorporated into the masterplan of the site, in accordance with the requirements of the Monmouthshire Sustainable Drainage Approval Body (SAB). A Flood Risk and Drainage Statement has been submitted.

Objective Number	RLDP Objective	Accordance
6	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. • support the adaptation and re-use of existing sustainably located buildings.	In allocating 9% of housing growth to Tier 3 and 4 settlements, the Deposit Plan recognises the value of main rural settlements to accommodate housing growth. The site does not contain any BMV agricultural land. The predictive ALC map shows that the site comprises poorer grades of agricultural land.
9	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	By virtue of accommodating 50% affordable housing, Land South of Rhyd y Meirch will provide opportunity for the younger population to live and work in Monmouthshire contributing to the creation of a more balanced demography.
10	To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	
11	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and	The site is capable of accommodating a sustainable form of residential development with strong placemaking credentials. Development of Land South of Rhyd y Meirch would comprise an extension to the existing settlement boundary of Llanover in keeping with the adjacent use.

Objective Number	RLDP Objective	Accordance
	promote people's prosperity, health, happiness and well-being.	The homes provided could cater for a range of needs (age and health) and affordability.
14	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in place or can be provided to accommodate new development.	It is considered that due to the proximity of the site to the existing settlement of Llanover, along with the modest proposal that connections can be made to existing services. Any contributions to local services and facilities would be via S106/CIL. A Dŵr Cymru Welsh Water pre-planning consultation request undertaken in 2021 states that foul flows and a potable water supply can be accommodated for the site.
15	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	The site is readily accessible from Llanover by active travel and Llanover is well connected to the surrounding area by public transport. The nearest bus stop is located approximately 150m to the north on the A4042 and is serviced by the 23 bus which provides hourly services in both directions to Newport and Hereford. Active travel routes will be provided both on-site and connecting off-site to the wider area. The site's good connection to existing facilities and services further reduces demand for private vehicle use.
17	To strive to limit the increase in global temperatures to 1.5oC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	Any development would be capable of utilising suitable building practices and technology to reduce the carbon footprint of the development at every stage of the project lifecycle and throughout the supply chain. The development of the site will address climate change pragmatically by considering the energy hierarchy in the detailed design proposals. New residential buildings will be delivered which include consideration of the following factors to reduce the overall energy demand of the development: • Site layout and design; • Building layout; • Energy efficient building fabric; and

Objective Number	RLDP Objective	Accordance
		• In home energy efficiency measurements.

Conclusion

In respect of Land South of Rhyd y Meirch, the Candidate Site High Level Assessment 2023 (MCC, 2023) states that the Site is not subject to fundamental constraints that cannot be mitigated, and no additional comments were made with regards to further work.

This submission demonstrates that Land South of Rhyd y Meirch is capable of accommodating sustainable residential development within Llanover. Such development accords with the RLDP Objectives and offers a sustainable alternative to the proposed allocation in Devauden.

The Llanover Estate is in a fairly unique position to manage the sustainable development of Llanover in particular. It is possible to create rural place that functions effectively as a place to live and work. CS0140 and CS139 (please see separate response) are able to complement each other as well as the existing structure of the settlement together with the facilities and services available.

On behalf of the landowner, we would welcome the opportunity to work with the Council to deliver the Land South of Rhyd y Meirch, Llanover for residential development of up to 26 dwellings.

MONMOUTHSHIRE RLDP - DEPOSIT PLAN CONSULTATION – CS0139 LAND AT FORMER PETROL STATION, LLANOVER

Spatial distribution of employment growth

Strategic Policy S2 sets out the settlement hierarchy which directs the distribution of development across the County. The settlement hierarchy allocates a portion of growth to the Tier 3 and Tier 4 Rural Settlements which account for 9% of the total residential growth across the County. While the provision of employment growth was deferred at the Preferred Strategy stage to be confirmed within the draft Deposit plan, it was stated that growth will to be consistent with the spatial strategy and commensurate to the level of housing growth. Notwithstanding, the Deposit Plan does not allocate any land within Main Rural Settlements for employment growth.

We believe that a commensurate proportion of employment growth should be directed to Main Rural Settlements, such as Llanover, consistent with the spatial strategy of the RLDP.

In line with this approach, on behalf of the landowner we would welcome the opportunity to work with the Council to deliver Land at Former Petrol Station (Candidate Site reference: CS0139, referred to hereafter as 'the Site') for employment uses.

Sustainability

The absence of employment allocations within main rural settlements overlooks their value in accommodating growth proportionately and sustainably across the county. The Site is within the settlement boundary of Llanover as per the Deposit Plan Inset Maps and could accommodate a sustainable extension to an existing rural employment site.

By virtue of its location adjacent to the existing employment centre, the Site would be well integrated with the existing community and would contribute towards enhancing the vitality of the rural settlement of Llanover. It is well accepted that major generators of travel demand, such as employment land can be located within easy reach by walking or cycling of an existing urban area and be served by public transport. Given Llanover's relatively good connection to nearby settlements by a range of public transport and active travel opportunities, it is an appropriate location for employment growth. Provision of employment growth within Llanover would also reduce the need for workers to commute to the Main Settlements.

The Site is sustainably located 5km south of Abergavenny and is easily accessible by bus and by a series of PRoW. Abergavenny is identified in the Preferred Strategy as a tier 1 primary settlement which provides a number of every day facilities and services including comparison stores, retail facilities including a Morrisons, public open space, a surgery, a pharmacy and a nursery. A number of primary schools and a secondary school in Abergavenny are accessible by public transport. The Site is also located 3.5km north of Goytre which offers a number of other facilities including a doctors surgery.

A sustainable balance could be achieved between the number of homes provided and expected job opportunities. This would help to sustain Llanover as a whole rather than just the proposed development.

Accordance with RLDP Objectives

The table overleaf identifies how development of the Land at Former Petrol Station, Llanover, would contribute to (and accord with) the relevant RLDP Objectives as per the Strategic Framework of the Deposit Plan.

Objective Number	RLDP Objective	Accordance
1	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	Development of Land at Former Petrol Station, Llanover for employment uses is a logical expansion of the existing employment centre. The employment space and possible farm shop will complement the existing range of facilities provided at Llanover.
3	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and wellbeing. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	Baseline ecological information submitted to MCC in 2019 identified that the Site is mostly occupied by improved grassland/former arable field of limited ecological relevance, which represents the most suitable area for any future development. The Site provides opportunities for local biodiversity enhancement through the replacement/ strengthening of defunct hedgerow margins at the site with new native tree and shrub planting, this would improve connectivity to habitats of higher suitability for commuting bats.
4	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.	The High-Level CS Assessment MCC (2023) notes that as per the NRW Flood Map for Planning, the Site is predominantly within Flood Zone 1 with a small area of Flood Zone 2/3 Surface Water Flooding on site. The 'high risk' surface water flooding is located on the southern boundary of the site. This area is the current entrance to the site where ground levels are slightly lower than the rest of the site and is likely to result in ponding of surface water. This area is proposed to be used for a SuDS detention basins and will form part of the drainage strategy for the site. A High-Level Flood Risk and Drainage Statement has been submitted. The Llanover Estate wish to confirm that an FCA would be submitted in support of any future planning application.

Objective Number	RLDP Objective	Accordance
6	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. • support the adaptation and re-use of existing sustainably located buildings.	Whilst the majority of the site is Grade 2 agricultural land according to the Welsh Government Predictive Agricultural Land Classification Map, the Objective acknowledges that best and most versatile (BMV) land covers most of the County and that development at sustainable locations will not be restricted. An ALC Survey could be commissioned to determine the actual ALC should the site be considered as appropriate for development of employment uses. The Deposit Plan adopts a pragmatic approach to BMV as a consequence of the overall supply of BMV at Monmouthshire.
9	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	The Llanover Estate is in fairly unique position to expand the number of homes at Llanover (CS 140) and provide business space. Whilst detailed employment numbers are yet to be calculated, it is anticipated that that circa 35 jobs could be accommodated. This should increase economic activity and broaden the demographic.
11	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	The Site is located within the proposed settlement boundary of Llanover. The capacity exists to increase the employment opportunities to sustain the existing population as well as services, facilities and public transport. The site will be wholly aligned to the identity of Llanover as there is no dilution of the place. The settlement would be well connected as one place overall. The employment

Objective Number	RLDP Objective	Accordance
12	To ensure Monmouthshire is a connected place where people feel part of a community, are valued and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	space and possible farm shop will complement the existing range of facilities provided at Llanover.
14	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in place or can be provided to accommodate new development.	It is considered that due to the proximity of the site to the existing settlement of Llanover, along with the modest proposal that connections can be made to existing services. Any contributions to local services and facilities would be via S106/CIL. A Dŵr Cymru Welsh Water pre-planning consultation request details that foul flows and a potable water supply can be accommodated for the site.
15	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	As set out above within the 'Sustainability' section of this response, Llanover is an appropriate location for employment growth on account of its relatively good existing connections to nearby settlements by a range of public transport and active travel opportunities. Provision of employment growth within Llanover would also reduce the need for workers to commute to the Main Settlements.
17	To strive to limit the increase in global temperatures to 1.5oC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	The development of the Site will address climate change pragmatically by considering the energy hierarchy in the detailed design proposals. New commercial buildings will be delivered which include consideration of the following factors to reduce the overall energy demand of the development: • Site layout and design; • Building layout • Energy efficient building fabric; and • In home energy efficiency measurements. The provision of employment opportunities onsite will ensure that employment opportunities are delivered to contribute towards enhancing the vitality of Llanover.

Conclusion

MCC has previously acknowledged that the Site is not subject to fundamental constraints that cannot be mitigated (Candidate Sites High-Level Assessment, 2023). With regards to heritage, we have been advised that an adverse impact is to be expected. However, it is noted that this would not amount to a significant impact and mitigation would be deployed to minimise any impacts on the Llanover Conservation Area, nearby Listed Buildings and the Llanover Historic Park and Garden.

The landowner has control of the site and would welcome the opportunity to work with the Council to deliver this land for development. Given that initial site assessment and technical work has been undertaken for the site, it is anticipated that if allocated, the site could deliver a range of employment opportunities which would include B1 and A1 uses early in the Plan period, in accordance with the RLDP Objectives.

1281

Barratt David Wilson Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Barratt David Wilson Homes (South Wales)	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our client welcomes the approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not been carried through to the deposit version of the Plan.

1.2 Our client considers that the overarching aims of the Plan are unobjectionable and broadly in line with the evidence base. However, they are fundamentally concerned about the level of disconnect between the evidence base, the issues faced and the constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the relevant test of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 Our client is also concerned over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan, alternatively the period for this plan should be extended to 2038 with additional allocations identified otherwise there will be further policy voids.

KEY ISSUES AND CHALLENGES

1.4 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability, economic growth and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP.

1.5 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) sought a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.6 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenario's upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.7 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. The evidence base for Future Wales recognises that the broad housing figures suggested are based on past building rates which themselves are low due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.8 A failure to provide sufficient housing will hinder the formation of new households and limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.9 Furthermore, housing can stimulate economic activity at the construction stage through the creation of jobs, investment, and through the demand for materials and services. Once built and occupied, more homes results in increased consumer spending and use of local facilities (multiplier effect), government revenue through tax, sales and permits.

1.10 Without a positive approach towards the future from the Council it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts from the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";
- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted; and
- our client is of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives our comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only decrease as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places and believe that ensuring sustainable growth is key to the future well being and vibrancy of communities.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our client remains significantly concerned by the approach taken towards restricting growth in the Local Authority. This approach does not reflect the evidence base which clearly points to a higher level of growth being an appropriate policy intervention to deal with the challenges identified. Indeed, our client is concerned that the since the first version of the Preferred Strategy the level of growth has fallen by up to 30%. This will have a significant and far reaching impact upon residents.

1.2 It is stated at 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.3 These shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

EVIDENCE BASE

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.4 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4. We set out the findings of each below (quotes are taken directly from the document).

1.5 For Option 3 (4,770 homes over the plan period plus a 15% flexibility allowance so 5,485 in total), the document indicated that this level of growth would result in *inter alia*:

- *"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.*
- *An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment,*

this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.

- *Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."*

1.6 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts are set out in the document:

- *"Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.*
- *Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.*
- *Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."*

1.7 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- *"This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.*
- *Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.*
- *Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."*

1.8 The original options report clearly pointing towards a higher level of growth being an appropriate policy intervention in order to address the challenges identified. It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- *"Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to de liver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."*

1.9 It is clear that all of the relevant evidence points towards the need for a higher level of growth in order to attempt to address the issues that have been identified.

MEETING NEEDS

1.10 Planning Policy Wales (PPW) 12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.11 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County;
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation;
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic;
- Lower build rates would not be able to offer the range or number of homes necessary to address the demographic imbalance, or provide the range of homes needed to attract the economically active age group and the type of homes the ageing demographic would require; and
- Opportunities to secure affordable housing at a lower level would not meet the identified need. The recent pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.

1.12 Plainly such outcomes cannot be considered to be desirable not least in terms of the Well Being of Future Generations Goals.

CONCLUSION

1.13 The approach taken, which involves significantly reducing the number of homes and jobs provided for, will not assist in addressing the key issues facing the County. Indeed, 50% of a lower provision of affordable housing will not address the problem of affordability. We are strongly of the view that this is contrary to "Test of Soundness 2: Is the plan appropriate?"; such an approach would not meet a number of the questions that are set out within the Development Plan Manual, for clarity this means:

- it is not locally specific;
- it does not address the key issues;
- it is not supported;
- the rationale cannot be demonstrated;
- it does not seek to meet assessed needs nor contribute towards the achievement of sustainable development;
- the vision and strategy are not positive or sufficiently aspirational;
- it is not logical, reasonable and balanced;
- it is not coherent and consistent; and
- it is not clear and focussed.

1.14 Furthermore as the Plan is not appropriate, it will be difficult to see how it will meet "Test of Soundness 3". Equally, it is unlikely to deliver or be effective in addressing the key issues. This means continued trends from previous development plans towards lack of affordability, out commuting and the ageing population.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.15 We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for Make provision for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

1.16 At this higher level of overall housing provision there will inevitably be a far greater amount of affordable housing provision.

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our client strongly objects to the current approach towards Spatial Strategy which does not appear to be based on the existing spatial hierarchy. Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

- Chepstow has a population of 12,376 and scores second highest in the hierarchy of settlements with 131.6 points (based on accessibility to services, jobs and population) yet it is only identified to accommodate 13% of the provision of new homes over the plan period;
- Monmouth has a lower population (11,197) and scores more poorly than Chepstow in the hierarchy assessment with 118.5 points, yet it has nearly 15% of housing provision which is higher than Chepstow despite the disparity in hierarchy points;
- Abergavenny has a slightly higher population than Chepstow (at 13,726) and only marginally more points in the settlement hierarchy (0.7 more points) but it accommodates nearly 22% of growth, a level far greater than Chepstow; and
- Caldicot scores lower than Chepstow in the hierarchy assessment (129.8 points), but has 35% of housing provision in the Plan period.

1.3 Our client strongly objects to the approach taken towards the distribution of growth amongst the main settlements. It is not logical nor sustainable to assign a lower level of growth to Chepstow which has the potential to significantly undermine its future sustainability and vibrancy.

1.4 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly the view of our client that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.5 Indeed, Creating and Sustaining communities is one of the Key Planning Principles list in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.6 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and***

cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."

1.7 There are many further references to ensuring that development is located in the most sustainable locations.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.8 We are strongly of the view that a higher proportion of growth should be identified at Chepstow that is commensurate with its role and function within the settlement hierarchy.

1.9 Accordingly and as was the original intention in the Preferred Strategy, our client's site at Bayfield, Chepstow should be allocated for c.145 dwellings and the tables within the plan updated to reflect this.

SOURCES OF SUPPLY (TABLE 2)

1.10 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below based on the Housing Background Paper (October 2024) and the Deposit Plan itself. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply is not realistic and appropriate having considered the evidence; and
- restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.11 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (i.e. between 2018/19 and 2023/24). Existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principal source of sites to contribute towards the RLDP.

1.12 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward that for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.13 Such historic under delivery will have had a significant, adverse on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.14 We would question the appropriateness of including an allowance for the last few years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of sites, we would expect pre-application enquiries to have been made on such sites by now.

1.15 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. In any event, this is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.16 Given the above, we believe that 230 is highly optimistic and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings. This would result in a gap of **115 dwellings.**

Trajectory

1.17 We welcome the approach in general taken towards the trajectory by the Council. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particular against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.18 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth etc.

1.19 There are two core bits of evidence that can be used to provide a forecast of the likely yield that a site will deliver in a plan period. One is the 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver' paper prepared by Lichfields which looks at a large sample of sites across England and Wales whilst the other is the experience of the timescales associated with lead in times and delivery rates of strategic site allocations in the adopted LDP.

1.20 Together, both suggest that the timescales associated with the delivery of larger strategic sites of this scale is often greater than anticipated. This is due to the time associated with securing planning permission, the time required to deliver both the onsite and offsite infrastructure that is required before a single property is delivered, and the number of homes that are delivered annually after first completion.

1.21 We have set out our concerns over the trajectory for two large sites, Caldicot and Abergavenny East. These are substantive sites that will inevitably have a lengthy lead in time simply by virtue of the multi stage planning consent process that they must go through alongside the time taken to deal with associated infrastructure once planning permission is granted.

1.22 In reality, the timescales for the delivery of the first homes on these sites are likely to be greater and the delivery rates lower when compared to the findings of the Lichfields Report or the past experience from the adopted LDP because:

- the strategic sites identified in the RLDP are that much larger than in the adopted LDP;
- whilst presumably agreements are already in place between landowners, both sites are under fragmented rather than single ownerships; and
- neither site is being promoted by housebuilders. The Abergavenny East site is being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes whilst Caldicot East is being promoted by a land promoter (rather than a developer) and the local authority.

1.23 BDWH's position is that the number of homes assumed to be delivered across these two sites in the RLDP plan period is too great and that the spatial strategy needs to be amended to reflect this with the reduction in the number of homes assumed to come forward from these sites met elsewhere.

Caldicot

1.24 We note the comments of Richborough Estates in the Housing Background Paper, however, notwithstanding those, we would have major reservations about the assumptions made over the lead in time for delivery and note:

- the submission of an outline application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, it absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application.
- we consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- as noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year on until the point, such that RM's for early phases are not in a position to be submitted until during the course of 2029 and pre-commencement conditions discharged; and
- given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.25 Given the above, we note that at least **320 dwellings** that are currently in the plan period will be delivered in the next period.

Abergavenny

1.26 We note the comments in the Background Paper, however, not withstanding that we have reservations about the lead in time for development. In particular:

- An outline planning application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would be submitted until during early 2029 and pre-commencement conditions discharged; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.27 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

1.28 Should these two sites deliver at the same pace as LDP sites, then it is likely that the figures to be developed outside of the plan period will increase.

FLEXIBILITY ALLOWANCE

1.29 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with a number of constrained sites not being brought forward, the previous LDP under delivered by 33% as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there as a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.30 The added issues with Phosphates and delivery of WWTW upgrades means that it is prudent to plan for a higher level of flexibility in case upgrades are not in place when anticipated as this could delay delivery.

1.31 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period. Accordingly a further **270 dwellings** ought to be identified with a total housing provision of 6,480.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.32 'We have already set out concerns regarding the level of growth, including that the approach to growth should be more positive. Notwithstanding. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.33 It is considered that to make the plan sound additional land will be required to be identified for housing. Given the supply side problems we estimate that there is a need for up to a further 895 dwellings to be identified during the plan period. To that extent our client's site at Bayfield is considered appropriate. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

1.34 Significant technical work has already been submitted to the Authority and a planning application was previously submitted. It is anticipated that a full planning application could be submitted within 12 months with a re-fresh of this information and c.145 dwellings would be expected to be completed by 2033. The candidate site proposals have been updated and the latest versions are appended to this representation.

APPENDIX 1: UPDATED PROPOSALS FOR BAYFIELD.


Site Area: 12.8 ha
Number of Homes: Up to 146*
*Approximate
01 Green gateway spaces with properties proposed to frame an provide natural surveillance.
02 Interfaces with existing properties backing onto the site are resolved achieving secure by design principles.
03 Attenuation features proposed at lowest points within the site and along site continues to intercept surface water runoff.
04 The development density responds to both the natural and built context, achieving lower looser urban fabric towards the edges of the site and interfaces with greens spaces. Higher densities are focused towards the centre of the site. The majority of properties consist of detached and semi-detached homes which is indicative of the wider area.
05 Existing PROW through the site have been respected and maintained, the majority of the routes have been set within green corridors and enhanced with 3m wide paths to support access to the wider active travel network.
06 Formal play is evenly distributed across the site and in response to existing play facilities to enure high levels of accessabiliy for existing nad futre residents.
07 Existing vegetation through the and around the perimeter of the site has been maintained and enhanced with new native planting.
08 Typography is a significant feature that contributes towards the site's identity, the layout responds to and celebrates this element resulting in a strong sense of place.
09 The proposed street patterns and networks radiate away from the highest points in the site creating a legible and permeable street pattern.
10 The layout creates a wide range of spaces with different functions that contribute towards and community interaction such as gathering places and local event spaces, which will act as cultural hubs and give people a place to forge relationships.
11 The street hierarchy is reinforced through a combinations of dual and single sided tree planted streets for primary and secondary streets, and tertiary streets utilising shared surface treatments. Private drives are proposed towards the edges of the site creating softer edges.
12 A community cafe with flexible community space will create a positive local amenity and aligns with local objectives to create more spaces where people can meet and support community cohesion.
13 The scheme recognises and responds to the network of existing national cycle routes consisting of on and off road routes and predestination routes the key destinations within Chepstow. The layout sets out a permeable network of routes within the site providing access onto the active travel wider network.
The network consists of two routes towards the town centre (NCR 4 and 31), one of which provides strong access to Chepstow station. The time to travel from the town centre from the edge of the site is approximately 17 minutes on foot and 5 minutes by cycle.
14 The potential to build upon the positive investment towards the community within the immediate context exists. Provision of a community garden, expansion to the community orchard and new social seating will enable the hosting of local events and create areas to enjoy the views out to the west. Consultation exercises undertaken as part of the recent plan for Chepstow highlights local desire to see more outdoor recreational space for broader demographics.
15 Opportunity to accomodate a bus route and stop within the site subject to vehicle access being taken from Bayfield Wood Close.
16 A complimentary cycle store will be provided by the community cafe and flexible community space, encouraging active methods of travel.
NOTES:
NOT FOR SITE PURPOSES: This drawing is a general arrangement plan only and is not intended for site purposes.
SCALE: Do not scale from this drawing.
SETTING OUT: All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.
CHECK: This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradicition or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.
No. Date By Revision Notes
PROJECT STATUS:
INFORMATION
the urbanists
Client Barratt Homes
Project Bayfields, Chepstow
Title Illustrative Masterplan
Project ID 2402 Organiser URB Block XX Level XX Type DT Role UD Dwg 002 Rev. Status DRAFT
Drawn JD Date 05/12/2024 Checked JD Scale 1:1250 @ A2
The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net
© This drawing is copyright and may not be reproduced in whole or part without written authority.
Drain
B 4235
Mile Stone
68.3m
70.1m
76.8m
66.0m
Boundary
Track
Woodside
ED Bdy
El Sub Sta
Reservoir (covered)
Corrymeela
Barnets House
Kingsmark House
Play Area
LAP
LEAP
Playground
Earthwork
PIERCEFIELD AVENUE / RHODFAR MAES PIERCE
BAYFIELD WOOD CLOSE
WOOLPITCH WOOD

Site Area: 12.8 ha

Number of Homes: Up to 146*

*Approximate

17 Proposed development area avoids areas of species rich grassland at the lower slopes of the field. Large area of the field is retained as POS with potential for new habitat creation and buffer planting beyond the field extents with the otential to create strong wildlife corridors alongside sustainable drainage systems.

01 Green gateway spaces with properties proposed to frame and provide natural surveillance.

02 Interfaces with existing properties backing onto the site are resolved achieving secure by design principles.

03 Attenuation features proposed at lowest points within the site and along site contours to intercept surface water runoff.

04 The development density responds to both the natural and built context, achieving lower looser urban fabric towards the edges of the site and interfaces with greens spaces. Higher densities are focused towards the centre of the site. The majority of properties consist of detached and semi-detached homes which is indicative of the wider area.

05 Existing PROW through the site have been respected and maintained, the majority of the routes have been set within green corridors and enhanced with 3m wide paths to support access to the wider active travel network.

06 Formal play is evenly distributed across the site and in response to existing play facilities to ensure high levels of accessibility for existing and future residents.

07 Existing vegetation through and around the perimeter of the site has been maintained and enhanced with new native planting.

08 Topography is a significant feature that contributes towards the site's identity, the layout responds to and celebrates this element resulting in a strong sense of place.

09 The proposed street patterns and networks radiate away from the highest points in the site creating a legible and permeable street pattern.

10 The layout creates a wide range of spaces with different functions that contribute towards community interaction such as gathering places and local event spaces, which will act as cultural hubs and give people a place to forge relationships.

11 The street hierarchy is reinforced through a combinations of dual and single sided tree planted streets for primary, secondary, and tertiary streets which utilise shared surface treatments. Private drives are proposed towards the edges of the site creating softer edges.

12 A community cafe with flexible community space will create a positive local amenity and aligns with local objectives to create more spaces where people can meet and support community cohesion.

13 The scheme recognises and responds to the network of existing national cycle routes consisting of on and off road routes and pedestrian routes to key destinations within Chepstow. The layout sets out a permeable network within the site providing access onto the wider active travel wider. The current network consists of two routes towards the town centre (NCR 4 and 31 from the site), one of which provides strong access to Chepstow station. The time to travel from the town centre from the edge of the site is approximately 17 minutes on foot and 5 minutes by cycle.

14 The potential to build upon the positive investment towards the community within the immediate context exists. Provision of a community garden, expansion to the community orchard and new social seating will enable the hosting of local events and create areas to enjoy the views out to the west. Consultation exercises undertaken as part of the recent plan for Chepstow highlights local desire to see more outdoor recreational space for broader demographics.

15 Opportunity to accommodate a bus route and stop within the site subject to vehicle access being taken from Bayfield Wood Close.

16 A complementary cycle store will be provided by the community cafe and flexible community space, encouraging active methods of travel.

NOTES:

NOT FOR SITE PURPOSES: This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT: All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK: This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradicition or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes
A	12/12/2024	HW	

PROJECT STATUS:

INFORMATION

the urbanists

Client	Barratt Homes
Project	Bayfields, Chepstow
Title	Illustrative Masterplan

Project ID	Organiser	Block	Level	Type	Role	Dwg	Rev.	Status
2402	URB	XX	XX	DT	UD	002	A	

Drawn JD Date 12/12/2024 Checked JD Scale 1:1250 @ A2

The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net

© This drawing is copyright and may not be reproduced in whole or part without written authority.



NOTES:

NOT FOR SITE PURPOSES. This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT. All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK. This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradiction or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes

PROJECT STATUS:

INFORMATION

the urbanists

Client	Barratt Homes
Project	Bayfields, Chepstow
Title	Street Hierarchy Plan

Project ID	Organiser	Block	Level	Type	Role	Dwg	Rev	Status
2402	URB	XX	XX	DT	UD	005		DRAFT

Drawn HW Date 05/12/2024 Checked JD Scale 1:1250 @ A2

The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net

© This drawing is copyright and may not be reproduced in whole or part without written authority.



NOTES:

NOT FOR SITE PURPOSES. This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT. All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK. This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradiction or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes

PROJECT STATUS:

INFORMATION

the urbanists

Client	Barratt Homes
Project	Bayfields, Chepstow
Title	Active Travel Plan

Project ID	Organiser	Block	Level	Type	Role	Dwg	Rev.	Status
2402	URB	XX	XX	DT	UD	006		DRAFT

Drawn HW Date 05/12/2024 Checked JD Scale 1:1250 @ A2

The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net

© This drawing is copyright and may not be reproduced in whole or part without written authority.



NOTES:

NOT FOR SITE PURPOSES. This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT. All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK. This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradiction or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes

PROJECT STATUS:

INFORMATION

the urbanists

Client	Barratt Homes
Project	Bayfields, Chepstow
Title	Townscape Plan

Project ID	Organiser	Block	Level	Type	Role	Dwg	Rev	Status
2402	URB	XX	XX	DT	UD	007		DRAFT

Drawn HW Date 05/12/2024 Checked JD Scale 1:1250 @ A2

The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net

© This drawing is copyright and may not be reproduced in whole or part without written authority.



NOTES:

NOT FOR SITE PURPOSES: This drawing is a general arrangement plan only and is not intended for site purposes.

SCALE: Do not scale from this drawing.

SETTING OUT: All setting out, levels, dimensions to be agreed on site. Do not use the information on this drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK: This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where and contradicition or uncertainty arises between the drawings and/or the schedule of works, it is the contractor's responsibility to seek verification from The Urbanists before proceeding. No claims will be met by The Urbanists, where the contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes
A	12/12/2024	HA	

PROJECT STATUS:

INFORMATION

the urbanists

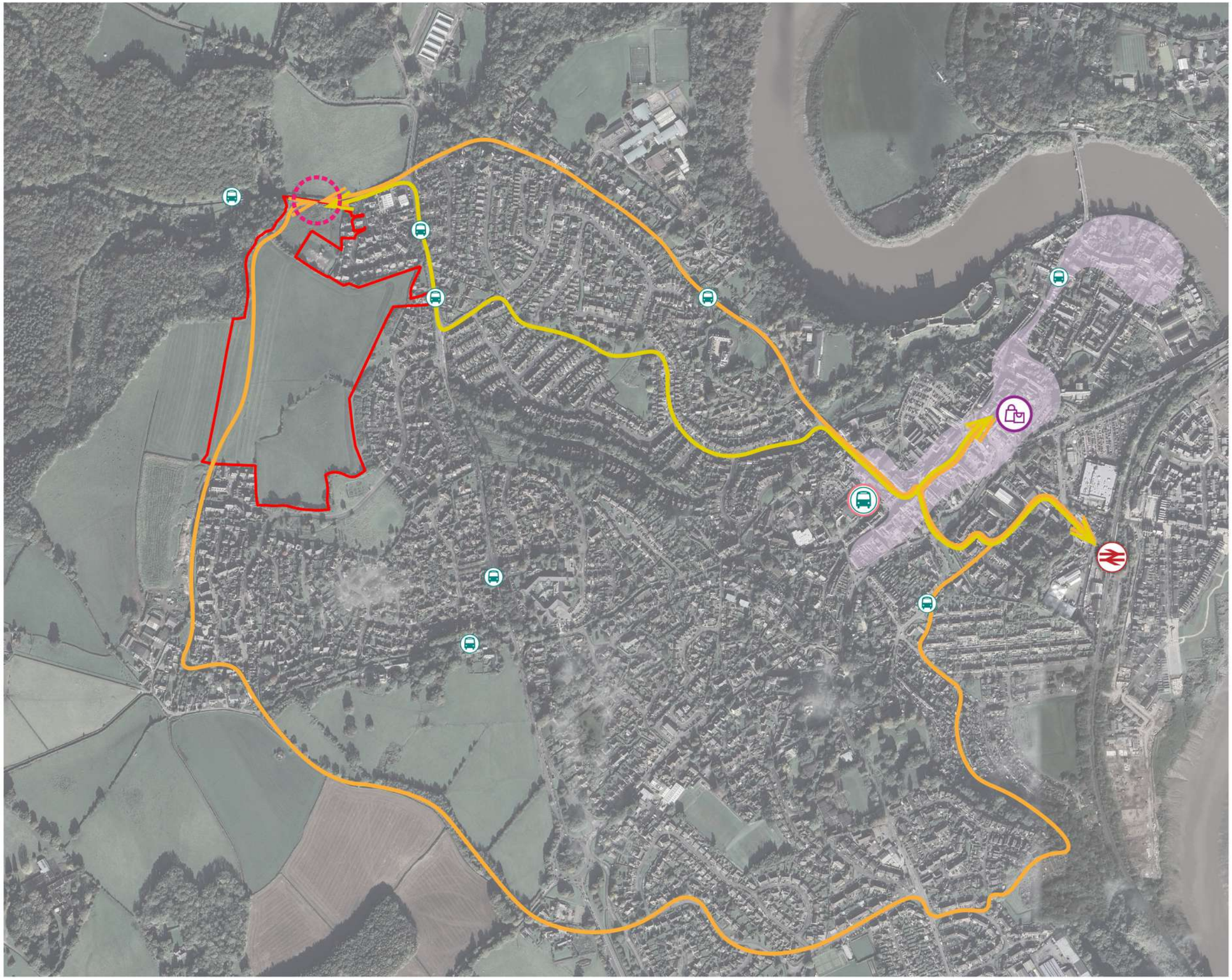
Client	Barratt Homes
Project	Bayfields, Chepstow
Title	Green Infrastructure Plan

Project ID	Organiser	Block	Level	Type	Role	Dwg	Rev.	Status
2402	URB	XX	XX	DT	UD	008	A	

Drawn HW Date 12/12/2024 Checked JD Scale 1:1250 @ A2

The Urbanists (Cardiff) - The Creative Quarter - 8A Morgan Arcade - CF10 1AF
The Urbanists (Bristol) - Generator Building - Finzels Reach - BS1 6BX
T: 029 2023 6133 E: info@theurbanists.net W: www.theurbanists.net

© This drawing is copyright and may not be reproduced in whole or part without written authority.



Wider Context Active Travel Plan Legend:

- Site Boundary
- Site Gateway
- Chepstow Town Centre
- Chepstow Train Station
- Chepstow Bus Station
- Existing Bus Stop
- Walking Route
- Cycle Route

Approximate Walking Times:

25 Minutes (1.2 miles) to Town Centre

30 approx. Minutes (1.3 miles) to Train Station

Approximate Cycling Times:

6/ 15 Minutes (1.2 / 2.2 miles) to Town Centre

8 / 20 Minutes (1.3 / 3 miles) to Train Station

Drawing Title:	Wider Context Active Travel Plan
Drawing Number:	2402-URB-XX-XX-DR-UD-SK001
Project:	Bayfields, Chepstow
Revision:	
Scale:	N/A
Date:	05.12.24

the urbanists

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

Question 4: Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

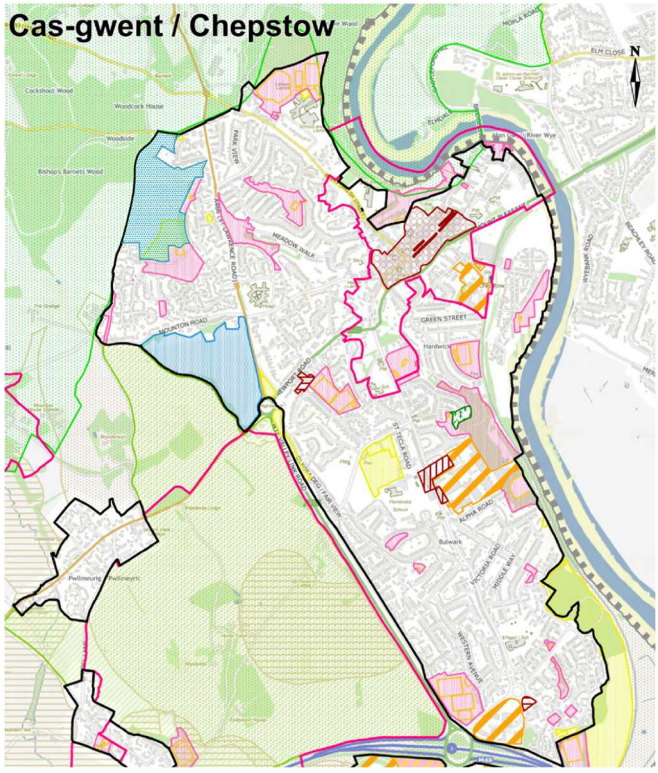
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 For the reasons set out in our separate representations the settlement boundary at Chepstow should be amended to reflect the inclusion of our client's site at Bayfield, Chepstow. It is noted that these reasons include the need to identify additional housing provision and to re-balance the distribution of growth with a higher proportion of development at Chepstow in line with the settlement boundary.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.2 That the settlement boundary is redrawn as per the plan below to include land at Bayfield.



6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Our clients object to the wording of the policy in its present form. In this regard, further clarity is sought on what would need to be included in an 'as-built performance survey' as there is no detail in the draft policy.

Presumably this requirement would be imposed by way of a pre-occupation planning condition on any consent, in which case this have a further implication on resources (as conditions will need to be discharged) and on timeframes for delivery of sites.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

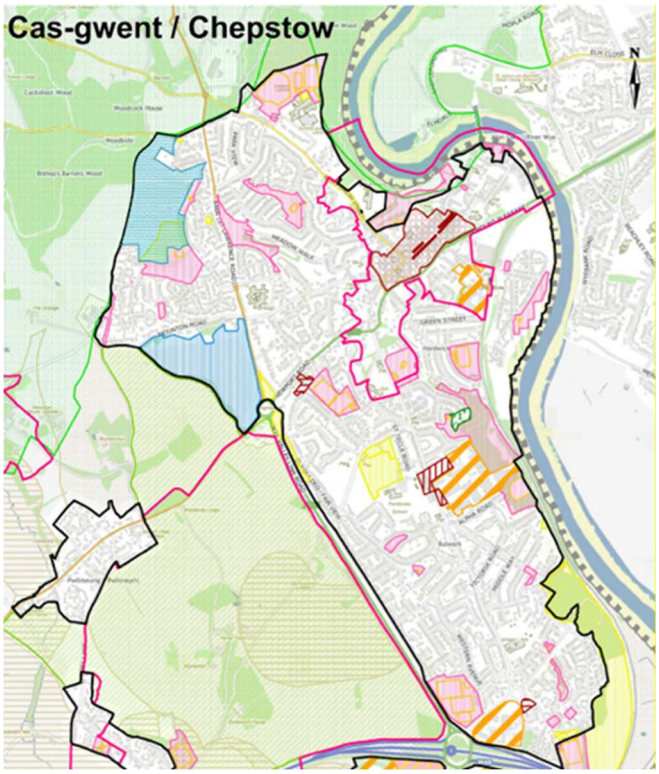
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our client has a number of concerns in respect of the following policies.

POLICY H1 RESIDENTIAL DEVELOPMENT IN PRIMARY AND SECONDARY SETTLEMENTS

1.2 As noted in our response to Question 4, a change is required in respect of the settlement boundary for Chepstow.



POLICY H8 HOUSING MIX

1.3 We consider that is should be clear that the element of the Housing Mix to be agreed with the Council should only relate to the affordable housing element. With regards to private sales, this is a matter for the developer concerned and needs to be a financially acceptable level.

1.4 Notwithstanding this, regarding para 12.10.16 at what stage in the planning process will this decision/ advice be available. Our client considers that it will be needed at pre application stage if delays in the determination of the application and abortive work on the scheme are to be avoided.

1.5 The tenure mix will also affect site viability particularly due to the 50% affordable requirement, so wording needs to be included to cover the need to be flexible, otherwise again potential delays in deliverability may occur. Regarding para. 12.10.7 our client suggests that the wording should include clarification of what 'housing evidence' is being referred to, we presume it should be the latest LHMA. Although flexibility in what evidence can be used would be helpful.

1.6 We require that the policy wording is amended to:

"To assist in addressing the demographic and affordability challenges in Monmouthshire, the affordable housing element of development proposals of 10 or more homes must include a range and mix of house types, tenure and size, to be agreed by the Council.

Such development proposals must be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included within the RLDP."

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 10: Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

1.1 We have set out in other representations the overarching requirement for additional allocations to be identified for a number of reasons including:

- Increased flexibility allowance;
- Due to the timings of the plan vs lead in times for development; and
- The need for higher growth levels.

1.2 There are two core bits of evidence that can be used to provide a forecast of the likely yield that a site will deliver in a plan period. One is the 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver' paper prepared by Lichfields which looks at a large sample of sites across England and Wales whilst the other is the experience of the timescales associated with lead in times and delivery rates of strategic site allocations in the adopted LDP.

1.3 Together, both suggest that the timescales associated with the delivery of larger strategic sites of this scale is often greater than anticipated. This is due to the time associated with securing planning permission, the time required to deliver both the onsite and offsite infrastructure that is required before a single property is delivered, and the number of homes that are delivered annually after first completion.

1.4 We have set out our concerns over the trajectory for two large sites, Caldicot and Abergavenny East. These are substantive sites that will inevitably have a lengthy lead in time simply by virtue of the multi stage planning consent process that they must go through alongside the time taken to deal with associated infrastructure once planning permission is granted.

1.5 In reality, the timescales for the delivery of the first homes on these sites are likely to be greater and the delivery rates lower when compared to the findings of the Lichfields Report or the past experience from the adopted LDP because:

- the strategic sites identified in the RLDP are that much larger than in the adopted LDP;
- whilst presumably agreements are already in place between landowners, both sites are under fragmented rather than single ownerships; and
- neither site is being promoted by housebuilders. The Abergavenny East site is being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes whilst Caldicot East is being promoted by a land promoter (rather than a developer) and the local authority.

1.6 BDWH's position is that the number of homes assumed to be delivered across these two sites in the RLDP plan period is too great and that the spatial strategy needs to be amended to reflect this with the reduction in the number of homes assumed to come forward from these sites met elsewhere.

Policy HA1 Land to the east of Abergavenny

1.7 We note the comments in the Background Paper, however, notwithstanding that we note:

- an application will be subject to an Environmental Impact Assessment, this is likely to take up to 12 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, it absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;

- we consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- we would then expect that RM's for early phases would be submitted until during early 2029 and pre-commencement conditions discharged; and
- given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.8 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

Policy HA 2 Land to the East of Caldicot

1.9 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- an application will be subject to an Environmental Impact Assessment, this is likely to take up to 12 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, it absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application.
- we consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- as noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year on until the point, such that RM's for early phases are not in a position to be submitted until during the course of 2029 and pre-commencement conditions discharged; and
- given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.10 Given the above, we note that at least **320 dwellings** that are currently in the plan period will be delivered in the next period.

1.11 Should these two sites deliver at the same pace as LDP sites, then it is likely that the figures to be developed outside of the plan period will increase.

Policy HA3 Land at Mounton Road Chepstow

1.12 Our client objects to the inclusion of Mounton Road rather than their site at Bayfield. It is clear from the Council's initial assessment of the two sites (November 2022) that Bayfield scores far more preferably with 11 points as opposed to 5 for HA3 (table 1 below) and it seems illogical for Mounton Road to take precedence. Indeed, based on this assessment Bayfield was rightly proposed as a strategic site within the Preferred Strategy (December 2022).

1.13 The updated assessment undertaken for the deposit plan has a number of inconsistencies where Mounton Road has scored more points than Bayfield despite there being no clear reason for this, we set this out in table 2.

Table 1: Initial Preferred Strategy ISA comparison of the sites

	Bayfield	Mounton Road
Potential Development	c. 145 Homes	c. 145 homes plus commercial (scope for a hotel and care home)
Agricultural Land Classification	c. 28% best and most versatile agricultural land	c. 72% best and most versatile agricultural land
Access to services and facilities	Proximity to schools and leisure centre	Proximity to train station (and less steep topography) and to Bulwark local centre
Location	Natural rounding off to the settlement boundary	Prominent location at gateway to Chepstow and the Wye Valley
Heritage	No impact	Setting of Listed Building
Landscape	Adjacent to and visible from AONB	Adjacent to and visible from Historic Park and Garden landscape
Current LDP	White land	Green Wedge
Red = 0 Amber = 1 Green = 2	11	5

1.14 It is noted that the updated assessment within the 2024 ISA (Technical Annex Candidate Sites) has a number of inconsistencies in how it has assessed both sites. These are noted below.

Table 2: Updated Deposit Plan comparison of the sites (ISA Technical Annex Candidate Sites 2024) with LRM / BDW comments and revised assessment

		Mounton Road	Bayfield	BDW / LRM Comments	LRM /BDW Assessment Mounton Road	LRM /BDW Assessment Bayfield
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	++	0	Absent a confirmed operator for the hotel, it appears to have limited potential for job creation. Indeed, the EIA screening report submitted by the site promotor (ref. 2024_01242) suggests that an outline planning application is to be submitted, which suggests that, given the time left in the plan period, it is unlikely that an operator will be found (if they are not currently known). Furthermore, it should also be noted that based on the HCA Employment Densities Guide, a hotel would generate 1 staff per 3 rooms and on average a care home is 1 staff per 7 residents depending on the level of care needed. This is	+	+

				likely to result in between 20 and 30 jobs. The score inflates the potential impact that Mounton Road would have and at the same time, neglects the significant positive impact that Bayfield will have in terms of investment and job creation through construction and spin offs. The Bayfield site is being promoted by, and is fully under the control of, BDW - a leading national housebuilder, with a strong track record of delivery in the local area. The development would be brought forward early in the plan period and BDW estimate that their site will result in: • 524 direct, indirect and induced jobs • £33m of GVA • 9 graduates, apprentices and trainees on programme • 90% of components centrally procured, assembled or manufactured in the UK • 99 sub-contractor companies supported • 59 supplier companies supported • £2.8m spending in shops and services Accordingly the scoring should be amended to reflect that the two sites will have similar impacts.		
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	-	++	It is noted that the Mounton Road site scores more reds than Land at Bayfield and the location in a Green Wedge is clearly a major negative factor weighing against the development of Mounton Road. Indeed, strategically it was previously considered important for Green Wedge designation and formed one of the reasons for refusing the previous planning application for residential development at the site in 2017 (LPA ref. DC/2013/00571).	-	++

	To enhance design quality to create places for people that maintain and enhance community and settlement identity	++	+	Mounton Road is noted as being 1200 to 1300 m to the nearest secondary school however, Land at Bayfield is 700 to 800m. In addition, the gradients are far more favourable for active travel routes from Bayfield to local schools and the leisure centre. As such, we are strongly of the view that in light of this, Land at Bayfield should be scored higher as gradients can be problematic for pedestrians and cyclists. , An amendment to the ISA score is required to reflect this.	+	++
Health and wellbeing	To improve the health and wellbeing of residents within Monmouthshire.	++	+	The criteria is that a site is within 800 m of a health service OR an active travel route. Therefore Bayfield should be scored equally.	++	++
		++	++	No change needed.	++	++
Equalities, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	-	-	No change needed.	-	-
Transport and movement	Increase sustainable transport use and reduce the need to travel.	++	+	It is noted that the only difference appears to be that Mounton Road is slightly closer to the Town Centre. Given gradients we are strongly of the view that a reasonable walking distance to a central shopping area is 1600m and as such the scores should be equal.	++	++
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	+	+	Mounton Road lies on a strategic highway route, as such residents will be more exposed to air pollution. The ISA 2024 states: Chepstow AQMA was designated in 2007 for levels of NO2; predominately caused by vehicle emissions from through traffic in the town centre. Options E (Mounton Road) is located adjacent to the AQMA, to the west of the A48 and the A48/	-	+

				A458 roundabout. It is therefore considered that new development would lead to increased vehicular use within the AQMA, resulting in heightened levels of NO2, and an overall adverse effect on air quality. While Option D (Bayfield) is located further from the AQMA.		
	To conserve, protect and enhance the water environment, water quality and water resources.	-	-	No change needed.	-	-
		+	+	No change needed.	+	+
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land	-	-	There is just 28% of BMV on Bayfield compared to 72% at Mounton Road. As such, the assessment is considered to be imbalanced and it is unreasonable for the sites to be scored the same and this should be corrected accordingly, with Land at Bayfield scoring more favourably.	-	0
		-		No change needed.	-	-
Biodiversity and geodiversity	Protect and enhance biodiversity within and surrounding the plan area.	-	-	No change needed.	-	-
Historic environment	Preserve and enhance Monmouthshire's heritage resources, including its historic environment and archaeological assets.	-	-	It is noted that Mounton Road is likely to impact upon the setting of a conservation area and a listed building (one of the reasons for the refusal of the previous planning application for residential development in 2017 -LPA ref. DC/2013/00571). The same score has been given to Land at Bayfield, on the basis that the development of the site may disturb nearby archaeological remains, although it is noted the site is screened from the remaining heritage assets by existing development. The assessment is considered to be imbalanced and unreasonable. Land at Bayfield should be given a better score on	-	0

				the basis it would have a less significant impact.		
	Promote understanding of Monmouthshire's cultural heritage.	-	-	No change needed.	-	-
Landscape	To protect and enhance the quality and character of Monmouthshire's landscape, townscape, and seascape.	?	?	The previous assessment considered that the location of Mounton Road at prominent junction at the entrance to Chepstow and the Wye Valley would have a detrimental impact. We are not sure why this doesn't count as a negative point in the updated assessment. The assessment is imbalanced and unreasonable. Furthermore, the 2024 ISA report states: "A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development. Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Chepstow. However, looking specifically at the Options in turn: Option D (Bayfield) is categorised as being of medium landscape sensitivity to residential development. Option E (Mounton Road) is a mixture of medium and high/medium landscape sensitivity to residential development. As such we are strongly of the view that Bayfield ought to score more favourably.	-	+
Climate change	Support the resilience of the Monmouthshire Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	+	+	No change needed	+	+

		+	+		+	+

1.15 The only apparent reason for the Council's switch from supporting Bayfield as an allocation to Mounton Road appears to be the identification of land for a hotel and care home that will provide limited employment opportunities. The EIA screening report indicates that an application will be in outline which appears to confirm that there will be no detail on these elements and in turn suggests that there is no operator or interest in the site. We are aware that the site has been marketed and similarly to a number of others that have also been marketed there is no demand for these uses. As such, there is no certainty that these uses would be implemented or can be relied upon.

1.16 In the absence of any identified end user and given the uncertainty over delivery for a modest number of jobs (most likely between 20 and 30 for a hotel and care home (based on HCA Employment Densities Guide) it is questioned how the harms associated with the development of the site outweigh the impacts that it will have on matters such as landscape, heritage and agricultural land. Indeed, on the basis of the criteria identified, Bayfield clearly presents a more sustainable opportunity and scores higher on the council's criteria.

1.17 We further note that Table 3.1 (Strategic Site Options of the Integrated Sustainability Assessment 2024) indicates that there is more support locally for the allocation of Bayfield over Mounton Road, with 51 respondents supporting Bayfield compared with 43 supporting Mounton Road. Alongside this, there is a greater level of opposition to Mounton Road with 143 opposed (compared with 132 opposed to Bayfield). This appears to have been disregarded in the assessment.

1.18 A planning application (DC/2013/00571) for 200 homes at the Mounton Road site was previously refused at Planning Committee for a number of reasons (including loss of an important green space & strategically important view and harm to the defined Green Wedge; unacceptable impact upon the setting of St Lawrence House, a Grade II listed building which makes a significant contribution to the landscape character of the area; the implications for minerals extraction on the site have not been fully investigate). These are significant considerations that weigh heavily against its allocation and the decision notice is appended to this representation.

1.19 1Notwithstanding the fact that we believe Bayfield should be allocated ahead of Mounton Road given its higher scoring, we have noted elsewhere that we believe firstly there is a need for a larger proportion of growth at Chepstow given its ranking as second in the settlement hierarchy and secondly there is a need to increase provision more generally due to lead in times for development and potential for schemes to fall outside of the plan period. As such, we believe that Bayfield ought to be allocated for new homes either in place of Mounton Road or in addition to it.

Bayfield

1.20 Our client considers that their site at Bayfield can make a meaningful contribution to the delivery of the housing and job growth rates set out in the Plan. As set out in the Candidate Site Submission previously made by BDW, the site is free from significant constraints and it can accommodate a sustainable form of development which is well integrated with the existing community and has strong placemaking credentials to contribute towards the vibrancy of the key settlement of Chepstow. Chepstow offers a large range of facilities and services, as well as being well connected. It is therefore a key focus for new development in the county indeed, it is ranked second in the settlement hierarchy yet has a much lower proportion of growth than other less sustainable settlements.

1.21 It is anticipated that the site could deliver a range of homes over the plan period. The site is under one ownership and the direct control of BDW. A planning application was previously submitted submitted, and withdrawn at the request of the Council however the submission and investment clearly demonstrates BDW's high level of confidence in the site and confirms that a new submission

can be prepared quickly. The site is deliverable early after plan adoption and there are no significant constraints or enabling works required at the site that would have a negative effect upon viability.

1.22 A significant amount of technical work has been submitted to the Council culminating in the proposal to allocate it within the initial Preferred Strategy. It is noted:

- The site is not within undefended flood plain (zone C2) or on greenfield sites within defended flood plain (zone C1), as per national planning policy and TAN15.
- The site is not within an allocated Green Wedge.
- The site is not an allocated employment site.
- The delivery of 50% affordable housing can be achieved at the site.
- The development is acceptable in other planning terms.
- LDP Policy S1 states the main focus for new housing will be within or adjoining the main towns of Abergavenny, Chepstow and Monmouth. The proposed development does comply with the overall spatial strategy and there is a need to increase provision of homes.
- The size and mix of the proposed dwellings is both suitable for the location and seeks to address demographic challenges.

1.23 Development of the site will result in an increase in population, once occupied, and this in turn will have a positive contribution towards the sustainability of existing facilities and services. The creation of active travel links into the surrounding area will contribute towards a more vibrant Chepstow. There will also be short term economic benefits associated with the construction of the development. In summary:

- 524 direct, indirect and induced jobs
- £33m of GVA
- 9 graduates, apprentices and trainees on programme
- 90% of components centrally procured, assembled or manufactured in the UK
- 99 sub-contractor companies supported
- 59 supplier companies supported
- £2.8m spending in shops and services

1.24 The updated master plan (ref) sets out how the site can deliver c.145 dwellings, it is noted that it comprises the following key elements that are shown on the master plan:

1. Green gateway spaces with properties proposed to frame and provide natural surveillance.

2. Interfaces with existing properties backing onto the site are resolved achieving secure by design principles.

3. Attenuation features proposed at lowest points within the site and along site continues to intercept surface water runoff.

4. The development density responds to both the natural and built context, achieving lower looser urban fabric towards the edges of the site and interfaces with greens spaces. Higher densities are focused towards the centre of the site. The majority of properties consist of detached and semi-detached homes which is indicative of the wider area.

5. Existing PROW through the site have been respected and maintained, the majority of the routes have been set within green corridors and enhanced with 3m wide paths to support access to the wider active travel network.

6. Formal play is evenly distributed across the site and in response to existing play facilities to ensure high levels of accessibility for existing and future residents.

7. Existing vegetation through the and around the perimeter of the site has been maintained and enhanced with new native planting.

8. Typography is a significant feature that contributes towards the site's identity, the layout responds to and celebrates this element resulting in a strong sense of place.

9. The proposed street patterns and networks radiate away from the highest points in the site creating a legible and permeable street pattern.

10. The layout creates a wide range of spaces with different functions that contribute towards and community interaction such as gathering places and local event spaces, which will act as cultural hubs and give people a place to forge relationships.

11. The street hierarchy is reinforced through a combinations of dual and single sided tree planted streets for primary and secondary streets, and tertiary streets utilising shared surface treatments. Private drives are proposed towards the edges of the site creating softer edges.

12. A community cafe with flexible community space will create a positive local amenity and aligns with local objectives to create more spaces where people can meet and support community cohesion.

13. The scheme recognises and responds to the network of existing national cycle routes consisting of on and off road routes and predestination routes the key destinations within Chepstow. The layout sets out a permeable network of routes within the site providing access onto the active travel wider network. The network consists of two routes towards the town centre (NCR 4 and 31), one of which provides strong access to Chepstow station. The time to travel from the town centre from the edge of the site is approximately 17 minutes on foot and 5 minutes by cycle.

14. The potential to build upon the positive investment towards the community within the immediate context exists. Provision of a community garden, expansion to the community orchard and new social seating will enable the hosting of local events and create areas to enjoy the views out to the west. Consultation exercises undertaken as part of the recent plan for Chepstow highlights local desire to see more outdoor recreational space for broader demographics.

15. Opportunity to accommodate a bus route and stop within the site subject to vehicle access being taken from Bayfield Wood Close.

16. A complimentary cycle store will be provided by the community cafe and flexible community space, encouraging active methods of travel.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.25 For the reasons set out herein, it is strongly our view that a further allocation should be added at Chepstow. This will ensure that the housing supply is more robust and flexible given the time period remaining. Our client is a developer with a proven history of delivering new homes in Chepstow and they are of the view that if they were to submit a full planning application for c.145 dwellings during the course of 2025 which would be developed by the end of 2033.

1.26 Accordingly, it is proposed that in order to make the plan sound, a new allocation is added as follows:

Policy HAx - Land at Bayfield, Chepstow

Allocated for residential development

Development of the site should accord with the parameters, placemaking principles and development requirements (to be confirmed), which should be delivered in an appropriately phased manner and be formally tied to planning consents.

Site Area	Allocation Type	Number of Homes
10.07 ha	Residential Development	Approx No. of Homes: 146 Open Market Homes: 73 Affordable Homes: 73

1.27 In addition the following plan (or similar) should be added as part of the explanatory text.



APPENDIX 1: MOUNTON ROAD REFUSAL NOTICE

Working with the citizens of Monmouthshire

Gwrthod Outline Planning Permission
Refusal of Outline Planning Permission

Deddf Cynllunio Tref a Gwlad 1990
Gorchymyn Cynllunio Tref a Gwlad (Gweithdrefn Rheoli Datblygu) (Cymru) 2012
Town and Country Planning Act 1990
The Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Cais Rhif/Application No: **DC/2013/00571**

Ymgeisydd/Applicant:	Taylor Wimpey C/o Agent	**Asiant/Agent:**	[redacted]

Mae **CYNGOR SIR FYNWY** fel Awdurdod Cynllunio Lleol drwy hyn yn **gwrthod** caniatau'r datblygiad dilynol yn unol â'r cynlluniau a'r cais a gyflwynwyd i'r Cyngor.

MONMOUTHSHIRE COUNTY COUNCIL as Local Planning Authority hereby **refuses** to permit the following development in accordance with the plans and application submitted to the Council.

Location:	Land at Mounton Road Chepstow
Description Of Proposal:	Residential development comprising up to 200 dwellings, highway access, open space and landscaping.

ATODIR Y RHESYMAU DROS WRTHOD
THE REASONS FOR REFUSAL ARE ATTACHED

Date: 13 January 2017

[redacted]

Rheolwr Gwasanaethau Datblygu/Development Services Manager

Cyngor Sir Fynwy/Monmouthshire County Council
Neuadd y Sir/County Hall
Rhadyr/Rhadyr
Brynbuga/Usk. NP15 1GA

Rhesymau dros Wrthod/Reasons For Refusal

1	The application site is outside the Chepstow Development Boundary and therefore contrary to the objectives of Policy S1 of the Monmouthshire Local Development Plan (MLDP) and contrary to the housing strategy for the County. Policy S1 states that outside development boundaries planning permission for new residential development will not be allowed. The proposed site is not compliant with the housing strategy of the MLDP as it is a greenfield site outside the town, and is not a sustainable location in relation to accessibility to public transport or by way of access to public amenities, including shops and public services. The proposed site is located within a designated Green Wedge. The proposed residential development, of up to 200 dwellings in this green wedge will prejudice the open character of the historic landscape and will lead to the growth of Chepstow towards the villages of Pwllmeyric and Mounton. If this development was to be allowed it would compromise the separate identity of the settlements of Pwllmeyric and Mounton from that of Chepstow as it would encroach towards them. The application site currently forms a significant open green space with a specific historic context, on this important approach into Chepstow. Development of this scale on this site would be contrary to the objectives of Policy LC6 of the MLDP and also the advice given in paragraph 4.8 of Planning Policy Wales as it would result in the loss of this important green space which is a strategically important view when approaching the town of Chepstow and the Wye Valley. The shortfall in housing land supply in this case does not amount to very exceptional circumstances sufficient to outweigh the harm to the Green Wedge.
2	The application site is a major site in the context of Chepstow and its development could seriously undermine both the MLDP strategy and deliverability of the allocated strategic housing site in Chepstow at Fairfield Mabey. The spatial strategy for Chepstow is based on the premise that the sustainability benefits of the existing brownfield site adjacent to the town centre should be taken full advantage of, while at the same time protecting the sensitive landscape setting to the west. The proposal is contrary to the housing strategy which underpins the LDP.
3	St Lawrence House is a Grade II Listed Building; it is a late 18th Century house retaining much of its character. The setting of St Lawrence House is extremely important to its character, which is defined by the land that is bounded by Mounton Road, the A466 and St Lawrence Lane. This importance is amplified by the fact that so many of the small country house estates have been encroached upon and developed, leaving only St Lawrence of this scale. The development of this prominent site would fail to preserve the setting of this important Listed Building which makes a significant contribution to the landscape character of this area.
4	The proposed housing development which is the subject of this application would be contrary to the objectives of Policy M2 of the LDP as the implications for mineral extraction on the site have not been fully investigated.
5	As part of the application an additional drawing has been submitted (Proposed Mitigation 1301.61 Figure 8.1) showing substantial improvements to High Beech roundabout which forms part of the Trunk Road Network. The applicants have failed to agree to enter into a 106 agreement to fund the improvements outlined on that plan.

Gwybodaeth/Informatives:

None

Polisïau Cynllun Datblygu Lleol Sir Fynwy:
Monmouthshire Local Development Plan Policies:

1	S1 LDP The Spatial Distribution of New Housing Provision
2	S2 LDP Housing Provision
3	S4 LDP Affordable Housing Provision
4	S5 LDP Community and Recreation Facilities
5	S7 LDP Infrastructure Provision
6	S12 LDP Efficient Resource Use and Flood Risk
7	S13 LDP Landscape, Green Infrastructure and the Natural Environment
8	S15 LDP Minerals
9	S16 LDP Transport
10	S17 LDP Place Making and Design
11	H1 LDP Residential Development in Main Towns, Severnside Settlements and Rural Secondary Settlements
12	CRF2 LDP Outdoor Recreation/Public Open Space/Allotment Standards and Provision
13	LC4 LDP Wye Valley AONB
14	LC5 LDP Protection and Enhancement of Landscape Character
15	LC6 LDP Green Wedges
16	NE1 LDP Nature Conservation and Development
17	EP1 LDP Amenity and Environmental Protection
18	MV1 LDP Proposed Developments and Highway Considerations
19	MV2 LDP Sustainable Transport Access
20	MV3 LDP Public Rights of Way
21	M2 LDP Minerals Safeguarding Areas
22	DES1 LDP General Design Considerations
23	SD2 LDP Sustainable Construction and Energy Efficiency
24	SD4 LDP Sustainable Drainage

Y **Cynlluniau** sy'n ymwneud â'r cais hwn yw:
The **Plans** relating to this application are:

Cyfeirnod Cynllun/Plan Ref No.	**Fersiwn Rhif/Version No.**	**Statws/Status**
1301 61 Figure 8.1 Proposed Mitigation at High Beech Roundabout 140 305 TAYT 2002 Red Line Plan 2305 Concept Master Plan Planning Statement • Design and Access Statement • Statement of Community Involvement • Landscape and Visual Impact Assessment • Arboricultural Assessment • Ecological Appraisal • Heritage Assessment		Refuse

NODIADAU

Apeliadau i Lywodraeth Cymru

- Os ydych wedi eich tramgwyddo gan benderfyniad yr Awdurdod Cynllunio Lleol i wrthod caniatâd cynllunio, yna gallwch apelio at Lywodraeth Cymru yn unol ag Adran 78 Deddf Cynllunio Tref a Gwlad 1990.

- Os ydych eisiau apelio, yna mae'n rhaid i chi wneud hynny o fewn **chwe mis** o ddyddiad yr hysbysiad hwn yn defnyddio ffurflen sydd ar gael gan yr Arolygiaeth Cynllunio, Parc Cathays, Caerdydd CF10 3NQ. Fodd bynnag, os yw'r datblygiad yn ddeiliad tŷ neu ddatblygiad masnachol bach, y cyfnod apêl yw 12 wythnos.

- Gall Llywodraeth Cymru ganiatáu cyfnod hirach ar gyfer rhoi hysbysiad apêl ond ni fydd fel arfer yn barod i ddefnyddio'r pŵer yma os nad oes amgylchiadau arbennig sy'n esgusodi'r oedi wrth roi hysbysiad o'r apêl.

- Nid yw'n rhaid i Lywodraeth Cymru ystyried apêl os yw'n ymddangos na allai'r Awdurdod Cynllunio Lleol fod wedi rhoi caniatâd cynllunio gan roi ystyriaeth i ofynion statudol, darpariaethau'r gorchymyn datblygu ac unrhyw gyfarwyddiadau a roddwyd dan y gorchymyn.

- Yn ymarferol nid yw Llywodraeth Cymru yn gwrthod ystyried apeliadau yn unig oherwydd bod yr Awdurdod Cynllunio Lleol wedi seilio eu penderfyniad ar gyfarwyddyd a roddwyd gan Lywodraeth Cymru.

- Mae dewis o 3 gweithdrefn apêl. Caiff Arolygydd ei benodi i benderfynu ar yr apêl ym mhob achos.

    - Sylwadau Ysgrifenedig - yr ydych chi a'r awdurdod cynllunio lleol yn gwneud datganiadau ysgrifenedig i gael eu hystyried gan yr Arolygydd.
    - Gwrandawiad Anffurfiol - caiff datganiadau ysgrifenedig eu paratoi fel uchod ond mae pob parti yn ymddangos mewn person gerbron yr Arolygydd.
    - Ymchwiliad Cyhoeddus - mae hyn yn broses ffurfiol, mae pob parti yn ymddangos gerbron yr Arolygydd, fel arfer gyda chynrychiolaeth gyfreithiol a chroesholi.

Hysbysiadau Prynu

- Os yw un ai'r Awdurdod Cynllunio Lleol neu Lywodraeth Cymru yn gwrthod caniatâd i ddatblygu tir neu ei roi yn ddarostyngedig i amodau, gall perchennog y tir hawlio na all naill ai wneud defnydd rhesymol fuddiol o'r tir yn ei gyflwr presennol na gwneud y tir yn alluog o ddefnydd rhesymol fuddiol drwy wneud unrhyw waith datblygu sydd wedi neu a fyddai'n cael ei ganiatáu.

- Yn yr amgylchiadau hyn gall y perchennog gyflwyno hysbysiad prynu i'r Cyngor lle mae'r tir wedi'i leoli. Bydd yr hysbysiad yn ei gwneud yn ofynnol i'r Cyngor brynu ei ddiddordeb yn y tir yn unol â darpariaethau Rhan VI Deddf Cynllunio Tref a Gwlad 1990.

NOTES

Appeals to the Welsh Government

- If you are aggrieved by the decision of the Local Planning Authority to refuse planning permission then you can appeal to the Welsh Government in accordance with Section 78 of the Town and Country Planning Act 1990.

- If you want to appeal, then you must do so within **six months** of the date of this notice using a form which you can get from the Planning Inspectorate, Cathays Park, Cardiff CF10 3NQ. However, if the development is householder or minor commercial development, the period to appeal is 12 weeks.

- The Welsh Government can allow a longer period for the giving of a notice of an appeal but will not normally be prepared to use this power unless there are special circumstances that excuse the delay in giving notice of appeal.

- The Welsh Government need not consider an appeal if it seems that the Local Planning Authority could not have granted planning permission having regard to statutory requirements, to the provisions of the development order and to any directions given under the order.

- In practice the Welsh Government does not refuse to consider appeals solely because the Local Planning Authority based their decision on a direction given by the Welsh Government.

- There is a choice of 3 appeal procedures. In all cases an Inspector is appointed to determine the appeal.

    - Written Representations – you and the local planning authority make written statements to be considered by the Inspector.
    - Informal Hearing – written statements are prepared as above but all parties appear in person before the Inspector.
    - Public Inquiry – this is a formal process, all parties appear before the Inspector, normally with legal representation and cross-examination.

Purchase Notices

- If either the Local Planning Authority or the Welsh Government refuse permission to develop land or grant it subject to conditions, the owner of the land may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

- In these circumstances the owner may serve a purchase notice on the Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x

If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? x	Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

Question 3, 4, 9 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing and in particular our clients site at Bayfield should be allocated as was the original intention in the Preferred Strategy.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1301

Melin Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Llanarth Estates, Melin Homes, Tirion Homes, Candleston and Sero	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not carried through to the deposit version of the Plan and are not available for the Authority to make.

1.2 Our clients consider that the overarching aims of the Plan are unobjectionable and in line with the evidence and Planning Policy Wales. Our clients' fundamental concerns however, relate to the level of disconnect between the evidence base, the issues faced and the artificially constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the tests of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 A failure to provide sufficient housing to meet the current and future needs in terms of scale and affordability will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. Monmouthshire is already one of the most unaffordable places for people to live and it has a higher proportion of outright owned larger family homes than in surrounding authority areas. Levels of need for elderly care and support are increasing and there is a lack of locally available care provision available to meet increasing need. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.4 We also raise concerns over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan alternatively the period for this plan should be extended to 2038 with additional allocations identified.

KEY ISSUES AND CHALLENGES

1.5 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP depending upon lead in times for development and viability.

1.6 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) supported a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.7 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenarios upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.8 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. For instance, the evidence base for Future Wales recognises that the broad housing figures that are suggested therein are based on past building rates which themselves are constrained due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.9 We also note that there are significant challenges facing rural businesses and communities including in respect of agriculture, forestry, tourism and care. These sectors have been particularly hard hit by trends that are impacting upon the supply of workers. Indeed, our clients are strongly of the view that greater consideration must be given to the rural economy and workforce generally and specifically the lack of affordable accommodation for those workers and a range and choice of housing for residents wishing to downsize within or close to their local communities, so they do not need to be displaced from the support structure they require. For instance, there is significant concern that many farms and/or agricultural units are becoming unviable and there is little being actively done to discourage them from diversifying or being lost;

1.10 Without a positive approach towards the future of the Authority it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts at the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of further comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";

- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted;
- our clients are of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.
- our clients believe that the Vision should include reference to the agricultural core of the County. Given uncertainties surrounding the future of farming and other rural activities (eg quarrying, forestry), lack of affordability and availability of a local workforce, there is a very realistic prospect that agriculture could be substantively gone in the Authority by 2033. Our clients own over 30 farm holdings and over 1500 ha of agricultural land in the centre of the County, each year it is more difficult to sustain such holdings when there is a lack of affordable homes for rural workers at the heart of the Authority. Commuter estates at Caldicot will not provide sustainable local housing to support businesses and residents in the rural heartland where they need it; much of rural Monmouthshire's landscape and character relies heavily on the stewardship of agricultural holdings, and the maintenance of this is time consuming and expensive with the need to pass on skills to future generations together with a wider understanding of the processes and farming methods involved in long term stewardship, protection, and enhancement of some of the County's most attractive attributes. Partnering with a not for profit society will bring forward housing to rent at below market rents ensuring key workers can access suitable accommodation locally; and
- Our clients welcome the inclusion of reference to a zero carbon County in line with Monmouthshire's declaration of a climate emergency and commitment to do all it can to help address the emergency.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives and comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasicity of supply in the housing market means that affordability

	demography and socially and economically sustainable communities.	will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places.
13	**Rural Communities** To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	Our clients are strongly of the view that a distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Indeed, it is often the smaller more remote settlements where property supply is limited and prices are highest and our clients consider that proportional growth is therefore appropriate in these locations provided appropriate infrastructure and community facilities exist to ensure the settlement is truly sustainable. However, this should not be at the expense of proposals that seek to address the much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural "way of life" ought to be the objective, as opposed to provision of large estates along the M4 corridor. Furthermore the particular difficulties faced as a result of Brexit and the lack of trade deals means that being self-sufficient and able to produce our own food is of primary importance. This is also of global importance by reducing the number of food miles some goods travel to reach market.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our clients are significantly concerned by the approach taken towards restricting growth in the Local Authority which itself has fallen by up to 30% since the 2021 Preferred Strategy Consultation and does not reflect the evidence.

1.2 Our clients are concerned that the approach taken has been entirely shaped by the Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Indeed, since we submitted previous representations on the higher growth strategy sought, the wider socio-economic circumstances have changed considerably with inflation, increases in the cost of living, energy prices etc. Adding these to the impacts of Brexit and Covid 19, our clients remain of the view that there must be a duty on every LDP to promote, encourage and foster the highest possible ambitions for achieving sustainable growth. In this regard we still believe that the approach taken to rule out a new settlement does not reflect long term planning aspirations or the specific circumstances of the County.

1.3 We are concerned that there is a significant conflict with Future Wales in the case of Monmouthshire, where the Welsh Government's position blocks a Plan-led intervention that can positively address the issues identified and hinder sustainable placemaking. The challenges facing Monmouthshire are very well acknowledged across existing policy, strategy and research documentation including the research that has shaped the previous iterations of the replacement LDP and the consideration of growth options. Indeed, it is well known that the housing market reinforces these issues and without positive interventions (i.e increasing the supply of new homes of appropriate size and tenure), there will be further worsening of matters such as the sustainability of services, the ageing population, high levels of in- and out- commuting (general lack of sustainability) and affordability. These issues have both economic and housing market implications as well as in respect of society and inequalities putting pressure on social care particularly for the isolated elderly.

1.4 Indeed, it is stated at para 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.5 These requirements shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.6 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4.

1.7 For Option 3 (4770 homes over the plan period plus a 15% flexibility allowance so 5485 in total), the evidence base indicated that this level of growth would result in inter alia:

- ***"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.8 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts would still exist:

- ***'Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.***
- ***Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."***

1.9 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- "***This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.***
- ***Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.10 It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- ***"Growth Option 1 is identified as best performing against ISA (integrated Sustainability Assessment) themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."***

SOCIO ECONOMIC CONTEXT

1.11 Hardisty Jones Associates (HJA) are widely experienced economists specialising in development needs and impacts. They were commissioned by our clients to consider the socio-economic context for Monmouthshire, specifically considering the central parts of the Authority which form the rural core. The results of their research reinforce the point that lower growth levels as envisaged would exacerbate the already significant problems experienced in the County and its rural communities and key workers.

Demographics / Age Profile

1.12 HJA note that the age profile of the central rural part of the Authority is largely an exaggerated version of that witnessed throughout Monmouthshire. It can be summarised as aged and ageing, including:

- An older population i.e. a high proportion of residents aged 65+ years, and a high proportion aged 50+ years, with shares in these age groups having increased over the last 10 years;
- A high proportion of retired residents and low proportion of households with dependent children; and
- A decrease in resident population under 50 years since 2010.

1.13 The Growth and Spatial Options Assessment previously undertaken confirms that the level of growth sought will not address these issues compared to the previous level of growth suggests it will. A higher level of growth is required in order to make a step change in this profile.

Housing Stock

1.14 The housing stock in the rural heartlands of the County is characterised by a greater proportion of larger properties. There is relatively low diversity of stock in terms of size, typology and tenure. This provides very limited choice in the market.

1.15 The share of households that own their property or privately rent is much higher than benchmark locations, and the share of homeowners that own their property outright with no mortgage is also much higher. The tenure profile exhibits a much lower share of households in social or private rented accommodation, and a very low proportion falls within affordable tenures.

1.16 A limited growth strategy will exacerbate this trend.

Affordability

1.17 Median house prices in the central part of the County are higher than other benchmark locations. This is at least partly driven by the size profile of the dwelling stock. Lower quartile house prices across the dwelling stock have consistently remained above the Monmouthshire equivalent. Average household incomes are low compared to many parts of Monmouthshire.

1.18 Housing affordability is significantly worse in Monmouthshire than Wales overall. The higher house prices and lower incomes data would suggest the local position in the heart of the County is worse than the district wide average. The housing mix is a contributor to this problem with such a high proportion of large detached and semi-detached properties and relatively few smaller properties and affordable tenures.

1.19 Housing affordability is without doubt a significant issue in Monmouthshire that must form a central component of any strategy. Accessing housing in rural areas is a challenge that extends beyond Monmouthshire, however, the County is the least affordable of all rural areas in Wales. The Local Housing Market Assessment has identified huge affordable housing need, way beyond what is deemed 'reasonable' to deliver via the Revised Local Development Plan.

1.20 Alongside the fact that policy would be unable to tackle the full extent of the challenge, sits the delivery challenge. Levels of development of both market and affordable housing over the current LDP period have fallen below targets (for a range of reasons including viability and technical constraints). In part this contributes to current need. In order to deliver the identified housing requirement and achieve ambitions around addressing the ageing demographic profile and reducing commuting levels, there is a need for an alternative level of growth which is higher than previously assessed.

Economy

1.21 Economic activity rates are generally high and would be very high if not for a substantial proportion of early retirees in the area. However, the area has experienced relatively weak employment growth, with declines in the local area prior to the Covid 19 pandemic. This is set against rising employment across wider benchmark locations and the current cost of living crisis and economic recession in the UK.

1.22 A restricted growth scenario (that retains the overall imbalanced age profile) is not going to address the fundamental problems.

1.23 From an economic perspective there is ambition to see a thriving and diverse economy. This will need to build on both inward investment and innovative, competitive indigenous businesses. This will certainly need to include developing existing rural based strengths and key sectors including tourism and leisure, food and drink and agri-tech as well as manufacturing, technology and digital activities. Farm practices will need to be future proofed to ensure they survive and the County continues its role as an important source of local produce. It needs to ensure the agricultural base is supported with key workers based locally and trained, with agriculture being recognised as an important industry essential to the health and wellbeing of local people. This is an approach advocated by the Welsh Government in their “Food for Wales, Food From Wales” document on local food production. None of these challenges can be met absent a robust and sustainable approach to planning interventions.

Commuting

1.24 There are large commuting flows both in and out of the County and the local area. Generally, essential workers (including key workers) commute into the Authority to take on important roles with more affluent workers commuting out of the Authority to urban centres such as Bristol, Cardiff and Newport. These levels have stayed broadly constant, or possibly increased, over the last 10 years despite policy ambitions to reduce these flows. The removal of tolls on the Severn crossings increased these figures as commuting costs have reduced.

1.25 These are clearly not the characteristics of a sustainable and equal place and addressing these challenges must be a key requirement of any Plan if the Council's obligations under the Well Being of Future Generations Act are to be met. Adopting a level of growth as is being suggested by Future Wales is in clear conflict with the evidence base which can only worsen this situation.

1.26 It is fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own entirely different but equally challenging issues that need to be addressed. It isn't possible to consider the whole of SE Wales as one when focusing on deprivation in previously industrial areas will not maintain the food producing heartland of the east of the region.

MEETING NEEDS

1.27 PPW12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.28 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County.
- Artificially low growth would impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. The pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable. Difficulties in sustaining services and facilities across the County will result in rural isolation.
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation.
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients strongly object to the current approach towards Spatial Strategy which does not adequately address the key challenges faced by rural communities.

1.3 We remain surprised and disappointed that perhaps the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. As we have previously commented, such an approach provides the step change required in the County. Notwithstanding this, with regards to the other potential components we note Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

Existing Infrastructure and Constraints

1.4 Many existing settlements (in all tiers and including the Strategic Sites) are subject to numerous constraints (including land assembly, landscape and nature designations such as AONB, SSSI, SAC etc) third party constraints, transport, facilities / services, foul and surface water drainage, phosphates, air quality etc.). It will therefore be vital to ensure that an adequate ownership and infrastructure plan is prepared to ensure that existing constraints are overcome with suitable levels of investment.

Distribution

1.5 Given the significant issues facing the central and northern parts of the Authority, our clients are concerned that 44% of growth is to be directed towards the M4 corridor / Severnside settlements which accommodate around 20% of the population, rather than spreading more evenly across the County in line with the other 80% of the population. This will not enable local needs to be met fully and will not address the key challenges in terms of demographics and affordability. Indeed allocating just 14% of growth to the significant number of Tier 2 and 4 settlements reinforces the existing trend of larger properties that are unaffordable for local people and key workers.

1.6 Similarly, whilst clusters have been identified for Severnside, Chepstow and Abergavenny, the strategy does not recognise the fact that there are a large number of other communities in the northern part of the County that are based around a hierarchy of hub and clusters with service centres serving a wide rural hinterland, around which sustainable patterns of movement and growth occur.

1.7 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key

issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

Sustainable development

1.8 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.9 Indeed, Creating and Sustaining communities is one of the Key Planning Principles listed in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.10 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."***

1.11 There are of course many other examples of relevant policy and Welsh Legislation requiring a sustainable approach towards development and meeting needs which we do not repeat here in the interests of brevity. However, it is clear that not addressing problems which will achieve sustainable development by balancing needs and addressing inequalities is contrary to the overarching objectives of the planning system.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.12 We are strongly of the view that a new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority.

1.13 It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

SOURCES OF SUPPLY (TABLE 2)

1.14 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as: following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply requirements are not realistic and appropriate having considered the evidence; and

- restricting the level of housing (location, range, choice and number) available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.15 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (ie between 2018/19) and 2023/24), existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principle source of sites to contribute towards the RLDP.

1.16 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward than for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.17 Such historic under delivery will have had a significant adverse effect on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.18 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.19 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.20 Given the above, we believe that 230 is highly optimist and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.21 We welcome the approach taken towards the trajectory by the Council in general. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particularly against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.22 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth.

Caldicot

1.23 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application followed by a tender and sales process further delaying delivery.
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- As noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year , such that RM's for early phases are not in a position to be submitted until 2029 and pre-commencement conditions discharged thereafter; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.24 Given the above, we note that at least **320 dwellings** that are in the current plan period will be delivered in the next period.

Abergavenny

1.25 We note the comments in the Background Paper, however, not withstanding that we submit that:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, (absent a timeframe for submission of an application), it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would not be submitted until early 2029 and pre-commencement conditions discharged subsequently; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.26 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

FLEXIBILITY ALLOWANCE

1.27 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward, the previous LDP having under delivered by 33% and as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.28 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.29 We have already set out our concerns regarding the level of growth in representations in respect of this which consider that the approach to growth should be more positive. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.30 It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 6. Do you have any comments on the climate change and renewable energy policies?

STRATEGIC POLICY S4 – CLIMATE CHANGE

1.1 Our clients support the overarching aims of the policy however, we believe that this ought to be applied to new allocations within the Plan on a site by site basis. Our clients believe that each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.

POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

1.2 Our clients are supportive of the approach taken. It is noted that their proposals for a new settlement demonstrate what is achievable, in particular a truly zero carbon community that uses the latest technology to generate and store the energy it needs as well as turn local waste into power and centralised recycling facilities and a pyrolytic plant to turn waste products into energy, reducing the net waste produced. This is possible due to the scale of the proposal and the unconstrained and significant land ownership.

1.3 They propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity at localised energy centres to power local transport, community facilities, homes and businesses. Surplus power will be exported to the national grid.

1.4 Phosphate free fertiliser as a bi product of the anaerobic digestor will be available for local farms to protect biodiversity. On plot micro power generation, such as ground and air source, solar and photovoltaic technology will be incorporated as a standard building design element alongside fast charging points, energy storage and high-performance thermal envelope.

POLICY CC1 – SUSTAINABLE DRAINAGE SYSTEMS

1.5 Our clients are supportive of the policy. It is noted that their proposed new settlement provides a nature-based solution which will secure a net biodiversity gain. Benefits will be seen at all scales from window boxes and planters, individual gardens, community allotments and orchards, to interconnecting green corridors, site wide planting and SUDs networks.

1.6 Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, linking into 125ha of new habitat within green space. New habitats will include meadow creation, wetland, woodland, hedge planting and specimen trees incorporating native plant species.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?

STRATEGIC POLICY S5 – GREEN INFRASTRUCTURE, LANDSCAPE AND NATURE RECOVERY & POLICY GI1 – GREEN INFRASTRUCTURE

1.1 Our clients are supportive of the approach taken by S5 and GI1. Their proposals for a new settlement demonstrate how green infrastructure, landscape and nature can thrive with innovative solutions, indeed, they propose creating over 125ha of new habitat and green spaces from intensively farmed land. Their approach taken seeks to ensure that their proposed community delivers an open, accessible and engaging environment. Interlinked open spaces will bind each neighbourhood together, increasing opportunities for recreation, helping and strengthen wildlife corridors and allowing people to move freely. Parkland will create a visitor destination in its own right and an important education resource.

1.2 Their proposed landscape strategy is based on six key components:

- The connection of two central but fragmented pieces of woodland. This ecological and recreational resource will be supplemented by a significant new native woodland;
- The creation of a new green spine running north-south through the residential areas, serving as an arterial route, transporting people via public bridleways, footpaths and cycleways through a mosaic of ecologically diverse habitats and connecting two fragmented stream catchments;
- The provision of two new public parks, offering individual amenity experiences at (i) Hilltop Park, with glamping and tourism and (ii) Wetland Park, based on the existing damp grassland area to the south-west;
- Four distinct neighbourhoods, based around community facilities, including communal growing spaces and play areas. These will be connected to a walkable village centre with footpaths and greenways based around existing hedges and field boundaries;
- The creation of a dedicated sports hub; and
- The creation of a patchwork of meadow and woodland, providing amenity-rich landscape, a highly sustainable and healthy wildlife resource and a dynamic rural-to urban interface where the urban environment blends seamlessly with open countryside.

1.3 In addition, and of significance their proposal is based around providing a positive contribution towards dealing with phosphates, and a mitigation strategy that ensures phosphate neutrality for the proposals but will also free up enough “credit” in order to facilitate a minimum of an additional 1,770 dwellings elsewhere in the north of the Authority, if desired. This can be increased to up to 6,000 dwellings through various measures.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY S7 AFFORDABLE HOUSING

1.1 Our clients are supportive of the aspiration to provide 50% affordable housing on allocations. In order to meet the known demographic needs of their local area, they have demonstrated on their proposals for a new community that fifty percent (50%) of housing can be affordable, including specific provision for key workers. In addition participating development partners will deliver below market rental properties. This will be a whole life community for all focused on the needs of residents including providing high quality assisted living units and care accommodation.

1.2 We have previously submitted detailed information with regards to the innovative approach our clients are taking in working with delivery partners, Tirion, Melin and Candleston in order to lead on a model for delivery. The development partners have proven track records of delivering a wide range of quality homes catering for all sectors of society. For ease I set out a summary here which helps to support the policy and demonstrate what is achievable.

Tirion Homes

1.3 Tirion is an independent not-for-profit Community Benefit Society delivering large scale mixed-tenure housing regeneration with a focus on affordable homes. They add value through innovative finance, design excellence and collaboration. They are currently delivering a portfolio of over 1500 units on regeneration sites in Cardiff, Newport and Tonyrefail. Tirion has developed an innovative long-term finance model with M&G Investments facilitating the delivery of over 50% affordable housing on their sites without any Social Housing Grant. The Tirion Model is particularly suited to large scale collaborative projects where the delivery of affordable homes improves rather than hinders viability through highly efficient finance.

1.4 At Ely Mill Tirion has also facilitated the development of a cluster of start up businesses “The Boneyard” which includes a café with pizza oven, therapy facilities, food producers, jewellery makers and crafters, a pottery workshop, furniture upcyclers and a plant emporium.

Melin Homes

1.5 Melin Homes seeks to be a dynamic organisation that works with others to make a positive difference to the people and communities they work with. They provide quality homes and services in Blaenau Gwent, Monmouthshire, Newport, Powys and Torfaen. As a registered social landlord, they work closely with local authorities and other partners to build thriving communities. Their mission is to make a positive impact on neighbourhoods by providing high-quality social housing to those who need it and pride themselves on providing an excellent service to customers.

1.6 Melin has over 4,500 units of accommodation and is on site with a large number of new homes for residents over many different locations. These houses form part of their commitment to develop 1,000 houses over 5 years. They seek to be an independent, ethical and sustainable business that delivers growth within their operating area. Their approach to growth is consistent with the business

approach to thinking longer term and being mindful of the five ways of working set out in the Well-being of Future Generations Act and the seven well-being goals set out in the Act.

1.7 Melin also hosts Y Prentis, a shared apprenticeship scheme which is jointly owned with Monmouthshire Council which was established to meet the increasing demands of socially procured goods, services and works associated with the construction industry in south-east Wales. Since its inception in 2012, Y Prentis has made a real difference in helping to train more than 300 apprentices, supporting more than 120 partners and helping to deliver in excess of 650 qualifications, making a real life positive contribution to the region.

1.8 As an organisation they continue to look forward, to meeting the challenges faced with enthusiasm, determination and imagination, and to reporting on their continuing journey to providing the highest quality homes and services to the people and communities they serve.

Candleston Homes

1.9 Candleston Limited is a wholly owned subsidiary company of Melin Homes and operates in South East Wales. It has been established to develop a reputation as a leading house builder of high-quality sustainable homes, whilst making long-term investment into communities and generating returns for Melin to further its charitable objectives.

1.10 They have delivered a number of new homes across Monmouthshire. The team are working hard on establishing a pipeline of opportunities in strategic locations and have become an essential part of the Melin Homes Group delivering new homes and augmenting the affordable homes provision across the region in which Melin operates.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 13. Do you have any comments on the visitor economy policies?

STRATEGIC POLICY S12 – VISITOR ECONOMY

1.1 Our clients note the significant role that the visitor economy plays in Monmouthshire and in particular its importance to the tourism economy. In addition to supporting local business, there is a need to contribute to the broader needs of the local and national economy. Tourism is of significant value to Monmouthshire, with 2017 statistics showing an influx of 2.24m visitors to Monmouthshire, which provided a £219m boost to the economy with 2,989 jobs supported by the sector. (Visit Monmouthshire, www.visitmonmouthshire.com/ tourism-business-support.aspx), Tourism Performance (2017). Cycling alone is a major contributor to the Welsh tourist industry. Visit Monmouthshire explains that "According to the 2015 Great Britain Tourism Survey, cycling is worth £90 million to the Welsh economy through daily visits and stays. Around 300,000 overnight visits to Wales each year involve cycling and/or mountain biking with an annual worth between £55 and £60 million." (Ibid)

1.2 Within their proposed new community, there are opportunities to connect areas of cultural heritage, education, camping and sports facilities to provide a healthy environment for both residents and visitors alike. There is huge potential, therefore, to take advantage of this burgeoning industry, develop existing facilities and make an even greater contribution through additional connectivity. There are also proposals for an equestrian centre which will be combined with substantial investment in public bridleways to provide a well-integrated set of facilities for horsemanship and exercise.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 14. Do you have any comments on the sustainable transport policies?

STRATEGIC POLICY S13 – SUSTAINABLE TRANSPORT

1.1 Our clients are supportive of the approach taken towards sustainable transport. It is noted that the policy includes reference to enabling solutions to rural transport issues. Our clients are well aware of the problems faced by rural communities and would like to draw the Council's attention to the benefits that an unconstrained new sustainable settlement could bring.

1.2 Indeed, in their proposals active travel, health and wellbeing, and mobility for all will be the key guiding principles in developing travel plans and sustainable travel choices for their new settlement. It includes a number of innovative solutions towards rural accessibility issues. Cwm Pentref will cater for all the needs of its residents so that they do not need to make distant journeys for basic needs and services.

1.3 It will establish a sustainable transport hierarchy that prioritises public transport, riding, walking and cycling over the use of the car with most facilities within walking distance. As a consequence the following measures are proposed:

Electric shuttle bus & Transport hub

1.4 Located just off the A40 a transport hub is proposed to connect residents, businesses and tourists to the surrounding major cities, towns and villages. An electric bus service operating from the hub would circulate within the site and provide internal connections to local train stations, local centres, school etc. In connection with a number of proposed car-free zones, this service would help ensure that all parts of the development can be easily accessed without having to revert to car travel. The hub would also provide cycle parking and connections onto a site wide footpath and cycle network.

1.5 Bus services operating from the hub would circulate within the site and allow onward bus connections to be made from the hub to Abergavenny, Raglan, Monmouth and Newport. The bus service to Abergavenny would be synchronised with the rail timetable and connect to the King Henry VIII secondary school.

Self contained and sustainable internal movements

1.6 It is proposed that within the development specific areas will be car free and the surrounding neighbourhoods will be within easy walking or cycling distance along a network of cycle and walking routes which have been planned to link all areas within the scheme and local points of interest (Raglan Castle and village, garden centres and local pus and restaurants as well as the nearby gliding centre).

1.7 An interconnected network of over 18km of footpaths and cycleways will provide a safe, off road, choice of routes through the development including safe walks to schools.

1.8 High quality bike storage will be located at strategic points such as the transport hub and local centres to encourage residents to use sustainable transport methods. Routes have been linked to the existing Public Rights of Way (PRoW) crossing the site to allow wider access to the network including National Cycle Routes and an existing National Trail. Footpath and cycle connections between the site and Raglan to the south east will be assessed and improvements explored. Furthermore opportunities will be explored in consultation with Sustrans to extend the network.

1.9 All dwellings will have their own covered cycle storage and sufficient cycle storage will be located at areas of general assembly (local centres, schools etc) and at all the nondomestic buildings.

1.10 The car free areas will be supported by nearby parking generally within 50m of a dwelling. The theme will be walkable neighbourhoods with facilities within 800m. Bus services within the development will be within 300m (max 400m).

EV priority

1.11 Electric Vehicle (EV) charging points will be provided to a substantial number of car parking spaces. These charging points could be connected to PV panels, battery storage and/ or other forms of renewable energy generated across the site (such as the CHP plant in the energy centre).

1.12 For on plot parking private carports will be preferred over garages and the carport roofs can be used for PV (Flexi-solar or similar).

1.13 Over and above walking and cycling, electric car charging and public transport, it is envisaged that a Car Club would be set up with spaces provided at convenient pick up locations throughout the development. In addition, on site infrastructure would be designed to enable future use by connected autonomous vehicles (CAVs).

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 16. Do you have any comments on the community infrastructure and open space polices?

STRATEGIC POLICY S15 – COMMUNITY AND RECREATION FACILITIES

1.1 We are supportive of the approach towards community facilities and recreation,

1.2 Our clients proposal for a new community demonstrate how master planning can deliver sustainable places based around community facilities. Central to their proposal for instance, localised neighbourhood centres will provide access to a wide variety of facilities including shops, business support, schools, health and social care facilities. These centres will be car free places linked to the bus and cycle network. Outdoor market spaces, and communal open areas will encourage farm enterprise and community cohesion.

1.3 Onsite energy centres will distribute locally generated power to the neighbourhood. They will incorporate site management offices and space for the emergency services. Additionally a repair workshop and upcycling centre with tool and equipment hire will be available alongside digital hubs to manage fibre to home connectivity and conferencing infrastructure providing technology support for home working.

1.4 The proposals also seek to create a network of Community Hubs, focused on local energy centres linked by the site's electric bus route and cycle network. These hubs will provide flexible co-working spaces, community rooms for meetings, training, events and classes (such as yoga, brownies, antenatal classes), recycling centres, postal distribution and collection centres, cafes, and space for faith groups to meet. Attached to each hub, a group of almshouses for the elderly and a children's day nursery seek to ensure that different generations can integrate and support one another.

POLICY CI2 – PROVISION OF FORMAL AND INFORMAL OPEN SPACE AND ALLOTMENTS / COMMUNITY GROWING AREAS

1.5 Our clients are supportive of measures that aid the local production of food. Indeed, this is an important component of their approach to their proposed new settlement, which seeks to champion local growers and producers both on and off site. From locally reared meat and dairy, to baked goods and honey, and fruit and vegetables. Their proposals will provide the infrastructure necessary to deliver fresh goods from local farm to the table, (as well as a phosphate free fertiliser as a bi product of the energy centre).

1.6 A new community farm with market garden is proposed, supplying veg boxes to low income residents. Allotments and community gardens, orchards and a 'food forest' will be woven through the development. The neighbourhood centres will cater for regular farmers markets and pop ups.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 17. Do you have any comments on the mineral and waste policies?

STRATEGIC POLICY S17 – SUSTAINABLE WASTE MANAGEMENT

1.1 Our clients are of the view that sustainable waste management ought to be promoted and they are supportive of the requirements. However, it ought to be noted that waste is not limited to commercial and household waste, some of which is not currently suitable for standard recycling processes. Rather there is a significant amount of agricultural waste across the Authority. There should be innovative means of dealing with this, for instance our clients proposed Anaerobic Digestion plant will take farm waste from across their landholding and the wider County to generate gas. The bi product will provide a phosphate and nitrate free fertiliser that can be used on local farms and has the potential to remove a major source of pollution (phosphates) from the local eco system and river catchments.

1.2 In addition, our clients proposed waste to energy gasification plant, which will use predominantly waste plastics (that cannot be recycled) along with some biomass to convert waste into a bio-gas. Such a facility could be located within the employment area alongside and indiscernible from other small factory type units with limited impact. In the case of our clients' proposal, the gasification plants would be converted at localised energy centres into heat and power. The heat will feed into a District Heating System in the village centre to support community facilities and higher density accommodation for the elderly and vulnerable whilst surplus can be converted to electricity to feed into the grid or directly to nearby homes.

1.3 Such a sustainable, net carbon zero approach to energy needs (including in respect of charging points for cars, bikes and shuttle buses) provides a unique opportunity for the County.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		x
Fails Test 3: Will the Plan deliver (is it likely to be effective)?		x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

Question 3 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

Archived: 12 March 2025 09:17:55
From: [redacted]
Sent: Mon, 16 Dec 2024 08:32:13
To: MCC - PlanningPolicy
Subject: Deposit Plan Representations
Importance: High
Sensitivity: None
Attachments:
Representation Form with sheets.pdf; E24124701 - Cwm Pentref Raglan - 2024 Ecology Note_compressed.pdf;

Dear Policy Team,

On behalf of Llanarth Estate, adjoining landowners, Tirion Homes, Candleston Homes, Melin Homes and Sero Homes (together with Sero Energy and perspective commercial partners) we are please to attach our representations.

Our clients have varying interests in ensuring a robust approach to land use planning is taken. It is of utmost importance to ensure that the evidence base underlies appropriate planning interventions in order to address the problems that exist within the County and to create more sustainable and equitable communities that positively respond to the challenges that are faced.

Our clients have previously submitted proposals for a new settlement, Cwm Pentref, at the heart of the county. They have submitted significant background work demonstrating how it could be delivered and the benefits that it could bring. Our clients note the position of the Authority with regards to the level of growth proposed and that LDP's cannot allocate new settlements. Notwithstanding that, given the issues involved, they are keen to ensure that it is clear that their proposal is still a viable and deliverable option albeit for allocation in the SDP.

Our clients include land owners and farming businesses within the central areas of the County that are now more concerned than ever for the future of the rural way of life in the heartlands of Monmouthshire. They are experiencing first hand many of the challenges identified within the various evidence base documents that have been prepared for LDP review over recent years highlighting the factors impacting upon rural communities across the County. These issues include a lack of local workforce and reliance upon workers commuting in due to the unaffordability of local housing, reliance on supply chains outside of the local area, the lack of community and support services, breakdowns and inadequacies in the provision of infrastructure, the increasing cost of land management, time and expense of compliance with increased legislation, the low market prices for produce compared with cheap imports, and the need for direct sales and traceability of food (farm to table). These are all worsening as the LDP review process becomes more prolonged due to inter alia the ongoing impacts of Brexit and the combined effects of the Cost of Living Crisis, inflationary pressures and energy crisis. A continued lack of robust strategy for dealing with these matters will only worsen the sustainability of rural communities. Indeed, this would be disastrous for the County in leading towards even higher house prices, continued lack of range and choice and more restricted demographics where local people have no choice but to leave, particularly the young.

Our clients' previous representations indicate that they believe a step change is required if the County's needs are to be met and if the key challenges facing the Authority are to be addressed. In order to meet these needs and challenges, their proposals for a sustainable new settlement of the County based on zero carbon, 50% affordable housing and best practice where possible demonstrate that there remains a positive planning intervention that can be made. There is no change in the evidence base that would suggest anything other than

such an approach being required. The implications of the Deposit Plan maintaining the status quo and continuing previous trends (lack of affordability, ageing population, out commuting etc) mean that the current situation will be exacerbated and the subsequent review of the Plan will prove even more challenging.

Our clients believe that with regards to the distribution of future growth, just adding incrementally to existing settlements alone will not address the key issues faced, the lack of supply, infrastructure constraints or delivery; nor will it provide a genuine opportunity to plan for the future needs and aspirations of the County on a long term basis including new work/life practices and a shift towards healthier more active lifestyles. Similarly, a large commuter extension at Caldicott will reinforce existing patterns of growth and outmigration.

Rather, our clients remain supportive of an appropriate level of growth led by the provision of a new settlement with complimentary growth across the remainder of the Authority and still believe that it is unsound and inappropriate to remove a positive planning intervention that has the potential to deliver significant benefits. Indeed, such an approach can positively address the Well Being of Future Generations Act and create a vibrant and active community with a wide range of land uses and activities – supporting the surrounding rural area as well as stimulating and encouraging growth. Our view is only strengthened by the impacts of Covid 19 and the move towards sustainable living in local communities and working from home.

As we have stated previously, our clients do not believe that the Authority should simply accept growth at any cost. Indeed, our clients believe that a new settlement in the right location would provide an appropriate long term opportunity to move away from existing problems, constraints and issues. It could provide a step change in the approach to the future well being of the County over the current, and future, plan period. It can also provide a Europe leading approach to best practice in the delivery of communities and places. A new settlement planned with sustainability at its heart provides an opportunity to respond to the unique circumstances in Monmouthshire to set an agenda for a new, modern and sustainable way of living appropriate to its location whilst benefitting surrounding settlements. As demonstrated in our clients' supporting evidence, this sets out the aspiration to provide 50% affordable housing, allowing new residents to fill local jobs in the agricultural, care, catering and tourism industries and a major leap towards net carbon zero – it can provide the step change that the County requires which would lead the development industry nationally.

We note that adopting a lower growth scenario favoured by the Welsh Government means that the key issues can't be addressed and it will be inevitable that a new settlement (or equivalent step change) will need to be considered in a future Strategic Development Plan (SDP) in order to address the problems identified and exacerbated. Indeed, we believe that it should be eminently feasible for an LDP to "dovetail" with an SDP, and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process.

We recognise that the Local Authority is constrained with regard to the ability to allocate a new sustainable community, however, our clients would like to emphasise the fact that their proposal remains a viable option for the SDP in due course. I note that more recent ecological work has been undertaken on the site and I also attach this for your records.

Our answers to the questions posed in the consultation are set out within the attached and our response is based on a provision of options that will respond to the updated LDP objectives, the Welsh Government's placemaking objectives and Well Being goals.

Our clients are more than happy to meet with the team as in due course if you would like to discuss any aspects of the proposal.

Kind regards

[redacted]



[redacted]

[redacted]

22 Cathedral Road, Cardiff, CF11 9LJ

REGISTERED ADDRESS: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ
DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE



SEPTEMBER 2024

soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone: - 033 00 13 00 12
e-mail: - enquiry@soltysbrewster.co.uk
Web Site: - www.soltysbrewster.com

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE

DOCUMENT REF: E24124701/Doc 07 – September 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	17th Sept. 2024	[redacted]		

ECOLOGY SUMMARY NOTE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

Background

Soltys Brewster Ecology (SBE) were commissioned by Llanarth Estate to undertake an ecological walkover survey of an area of land at Raglan, Monmouthshire (central grid reference: SO404092, see Site Location Plan in Appendix I). The area, which encompasses agricultural farmland with associated hedgerow, treeline and woodland boundaries, has been proposed as a strategic candidate site for residential development as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP) review process. An initial baseline survey was completed at the site by SBE in 2019[1], with an updated Preliminary Ecological Appraisal undertaken again by SBE in 2021[2], following changes to the site's redline boundaries. The results of these surveys are now considered 'out of date' and so in order to establish if there had been any notable changes to site conditions (i.e. type and distribution of habitats), an updated walkover survey was undertaken in August 2024 to inform the current promotion.

2021 Survey Work

The 2021 survey visit (SBE) revealed limited range of habitats at the candidate site, in line with its agricultural use, with conditions largely consistent with the findings of the 2019 survey (see 2021 Extended Phase 1 Habitat Plan in Appendix II). The majority of the site consisted of arable and improved grassland fields which were considered of low ecological importance. Other habitats present included poor semi-improved grassland, plantation woodland, scattered trees and scrub, continuous bracken, hedgerows, ponds, swamp, ditches and buildings – of which hedgerows, ponds and swamp were all identified as Section 7 Priority Habitat under the Environment (Wales) Act 2016.

The habitats present at and directly adjacent to the site were considered likely to support locally foraging/commuting bat species, nesting birds (including ground-nesting birds), Badger *Meles meles* and amphibians, potentially including Great Crested Newt *Triturus cristatus*. The habitats also had limited potential to support Hazel Dormouse *Muscardinus avellanarius* and common reptiles, while the survey identified several trees and buildings at the site with potential to support roosting bats. No invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded at the site.

[1] Soltys Brewster Ecology (SBE) (2019). *Land at Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885901/DOC 02 – 30 July 2019.

[2] Soltys Brewster Ecology (SBE) (2021). *Cwm Pentref, Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885902/DOC 01 – 24 August 2021.

A desk study completed as part of the 2021 Preliminary Ecological Appraisal confirmed that the candidate site does not lie within or adjacent to any internationally or nationally designated sites for nature conservation, and neither can any such site be found within a 1.5km radius. Several locally designated Sites of Importance for Nature Conservation (SINCs) were identified in the local area, none of which would be impacted by the proposal based on their physical separation from the site (the nearest SINC was found approximately 400m to the northwest). The data search did reveal that the candidate site contains one parcel of Ancient Semi-natural Woodland (ASNW) and three parcels of Plantation of an Ancient Woodland Site (PAWS), associated with Chapel Wood and Pentwyn Wood. A copy of the 2021 desk study information received from South East Wales Biodiversity Records Centre (SEWBReC) is included within Appendix III.

2024 Walkover Survey

The updated site walkover survey was undertaken on the 15th of August 2024 by a suitably qualified ecologist[3]. Overall, conditions across the candidate site have remained broadly consistent with what was mapped/recorded in 2021, and as such the 2021 Phase 1 Habitat Map (see Appendix II) is still considered to be representative of the site. Site notes taken during the 2024 walkover survey, along with accompanying photos and an annotated map, are included within Appendix IV.

Habitats

The majority of the candidate site remains occupied by a series of arable or improved grassland (mostly Ryegrass leys grown for hay/silage with some sheep pastures in the west) field parcels which were considered to hold limited ecological value and continue to represent the most suited areas for any future development. Other habitats recorded at and immediately adjacent to the site include parcels of plantation woodland, scattered trees and scrub, hedgerows, ponds, swamp, ditches and buildings – all of which are as described in 2021. These habitats, which are mostly associated with the field boundaries/margins, were considered to represent more important ecological features (in context of the site), with hedgerows, ponds and swamp all still listed as S7 Priority Habitats in Wales. The only notable changes since the 2021 survey visit related to some minor changes in land-use practices/management within several of the agricultural fields – these changes are set out in Table 1 below.

[3] Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of habitat and protected species surveys and previous knowledge of the candidate site.

Table 1 – Changes to land use/management in field parcels

Field No.	Changes to habitat/use
F6	Previously Arable – now sown with improved grassland.
F7	Previously poor semi-improved grassland – appears to have recently been sown with improved grassland (Ryegrass ley grown for hay/silage).
F11	Previously unmanaged/dis-used land parcel covered entirely in continuous Bracken – The field is still unmanaged with the Bracken now being replaced by successional scrub comprising Bramble with young strands of Willow *Salix sp*. and Birch *Betula sp*.
F16	Previously improved grassland – now used as Arable.
F19	Previously improved grassland – now used as Arable.

The various buildings found at across the site (i.e. those associated with Wern-Y-Cwrt Farm in the west, or the barn found in the far east) also remain in similar appearance to what was recorded in 2021, with no notable changes to their current use or condition – see Target Notes 1 & 6 in Appendix IV.

No invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were found at the site during the walkover survey. However, Cherry Laurel was noted within one of the woodland parcels in the northern extent of the site (see Target Note 12). While this species is currently not listed on Schedule 9, it is considered particularly invasive and can spread rapidly in woodland environments if left unmanaged.

Protected Species

As the type and extent of habitats across the site have remained consistent with what was recorded during the 2021 survey visit, so does the site's potential to support protected or priority listed species (as discussed in paragraphs 3.37 – 3.50 of the 2021 PEA report). The parcels of woodland, hedgerows and treelines continue to represent good quality habitat for a range of tree/shrub nesting birds and foraging/commuting bats, with the open fields likely support ground-nesting bird species such as Skylark *Alauda Arvensis* – which were observed at the candidate site during the 2019 survey. Several ponds found at and adjacent to the site were also considered to have a low potential to support Great Crested Newt (with this species known to inhabit the local area), while the habitats were also considered to have low potential of supporting Hazel Dormouse and populations of common reptile.

The updated survey confirmed that all of the trees previously (2021) identified as holding potential to support roosting bats are still present and remain in similar condition. This included 2no. trees with high

potential and 14no. trees with moderate potential. Under the current best practice guidelines[4], any trees assessed to hold moderate/high potential (PRF-M) would require further survey work if these were to be felled, as outlined in section 5.4 of the 2021 PEA report. A disused barn within Field 5 was assessed to have a low potential to support roosting bats and so would also require further survey work (for roosting bats) if this was to be demolished or converted/refurbished as part of the development (as outlined in section 5.4 of the 2021 PEA report).

[redacted]

[4] Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition). Bat Conservation Trust, London

[5] Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*: Developing Best Practice in Survey and Reporting. IEEM, Winchester.

Table 3 – Disturbance risks and protection zones for Barn Owl, adapted from Shawyer (2011).

Activity Type	Example	Disturbance risk (displacement from nest)	Min protection zone	Disturbance risk (displacement from nest)	Min protection zone
		Continuous activity		*Occasional activity*	
Pedestrian Movement	Construction workers walking near nest	Low/Medium	20 m	Low	10 m
Artificial lighting	Arc lights illuminating works but (not directed toward the nest)	Low/Medium	30 m	Low	20 m
Vehicular movement	Vehicles or heavy plant moving past the nest	Medium	40 m	Low	30 m
General building and landscape works	Laying of concrete, bricks, roofing using mechanised plant	Medium/High	60 m	Medium	40 m
Heavy construction works	Ground levelling, piledriving, concrete crushing etc. using heavy plant	High	175 m	High	150 m

Conclusions & Recommendations

As conditions at the site have remained largely unchanged, many of the conclusions and recommendations set out in the 2021 Preliminary Ecological Appraisal also continue to remain appropriate for any future development at the candidate site. In order to inform a planning submission, further survey work may be required for bats, Great Crested Newt and Hazel Dormice (dependant on any future site layout plans). There are also several precautionary measures that would also be appropriate during the clearance/construction/operational phases of any future development in order to safeguard wildlife and other features of ecological value at the site. As previously mentioned, hedgerows, ponds and swamp are all listed as S7 priority habitats, and so any loss of these habitats would therefore require some compensation measures, which could entail new habitat provision or the positive management of retained areas of vegetation.

[redacted]

[redacted]ield parcels 3 and 4, as well as the northern extent of field parcel 2, in the eastern extent of the site could be excluded from any future development, with these areas left as open grassland as part of the site's POS or Green Infrastructure (GI) network. These fields could be left as a 'mitigation zone/biodiversity protection area' and enhanced with the arable crops replaced with a species-rich wildflower meadow mix in order to provide habitat resources for a wide range of wildlife. Doing so would also contribute to the scheme achieving a net gain in biodiversity units.

Therefore in accordance with the current LDP and Planning Policy Wales (PPW 12), any development at the candidate site will need to adhere to the avoidance, mitigation and compensation hierarchy. Appropriate avoidance, mitigation and enhancements measures for the site (as set out in the 2021 PEA) are summarised below:

Avoidance

- Any future vegetation clearance at the candidate site i.e. tree/scrub removal to be undertaken outside of the nesting bird season (clearance possible between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.
- Retention of the site's boundary features and field margins as part of the site's Green Infrastructure (GI) network.
- Retention and protection of all Ancient Semi-natural Woodland (ASNW) and Plantation of Ancient Woodland Sites (PAWS) with appropriate buffers separating these from development.
- Retention of any S7 priority listed habitats (i.e. ponds, swamp and boundary hedgerows) as far as practical.
- Retention of any trees considered suitable of supporting roosting bats.
- [redacted]

Mitigation

- Any loss of S7 priority listed habitats to be compensated for through a combination of compensatory measures which could include new species-rich grassland/hedgerow/scrub

planting, new pond creation and retaining parcels of grassland around the site with these managed as wildflower meadows to maintain resources for pollinators/invertebrates.

- Appropriate mitigation for the loss of ground-nesting bird habitat at the site – e.g. retention of field parcels at or adjacent to the site as arable/open grassland, with 'Skylark plots' provided in these fields. [redacted]
- Design of site lighting to minimise artificial light spill onto boundary features and woodland parcels to limit impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 0.5 lux.
- Covering of any excavations overnight or means of escape provided during the construction phase to minimise risks to any wildlife that may become trapped.
- Dependant on likely impacts of any future development layout (e.g. requirement for hedgerow or woodland breaches/loss), further survey work to be completed for bats (transects and automated surveys), Hazel Dormice and Great Crested Newt to inform specific licensing and mitigation requirements with regards to the proposed development layout.
- Precautionary approach to any clearance of fringe vegetation/hedgerows at the candidate site to safeguard reptiles and common amphibians.
- Creation of 130mm x 130mm gaps at the bottom of any garden/boundary fencing to allow continued connectivity through the candidate site for Hedgehog and other small mammals[6].

Enhancement

- Eradication of Cherry Laurel from the woodland parcels.
- Strengthening of any defunct hedgerow boundaries and/or damaged hedgerow sections with new native scrub/tree planting.
- Provision of bat/bird/insect boxes on retained trees and new buildings.
- Provision of rock/log piles along retained boundary hedgerows and woodland edges for use by common herpetofauna.
- Provision of hedgehog houses/homes within retained woodland parcels.
- Design of any SuDS features to benefit biodiversity.
- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity.

[6] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

- Implement management plan for retained and newly created habitats to maintain and enhance their value to local biodiversity.

APPENDIX I SITE LOCATION PLAN

LAND PROMOTION AGREEMENT MAY 2021

North

SCALE 1:6000 @ A3

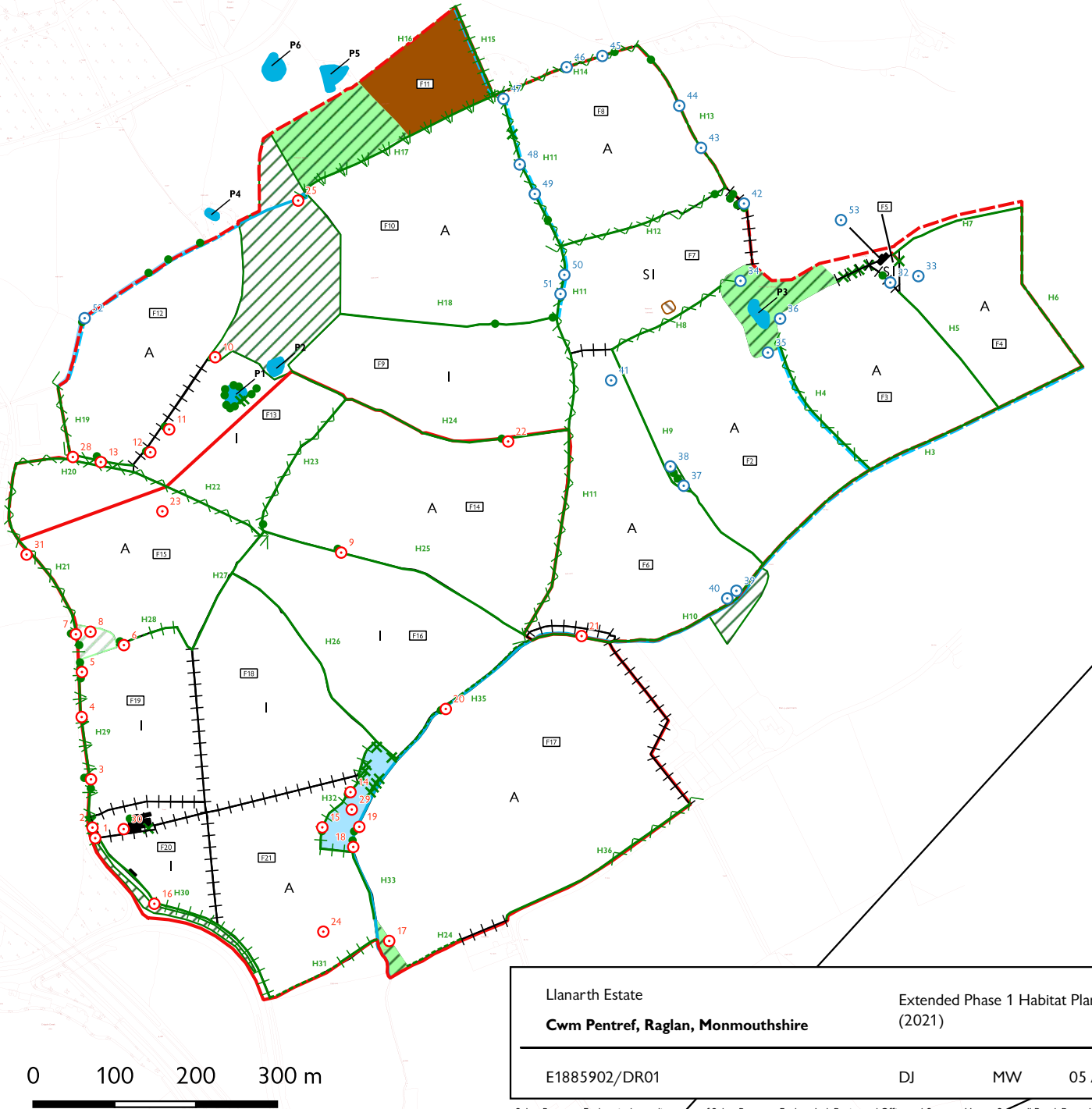
100 m 0 600 m
1: 6,000

PROMOTERS LAND

FIRST OWNERS LAND

SECOND OWNERS LAND

APPENDIX II 2021 EXTENDED PHASE 1 HABITAT PLAN



Key

- Site Boundary/ Survey Area 2019
- Site Boundary/ Survey Area 2021
- A1.1.2 Broad-leaved Plantation Woodland
- A1.2.2 Coniferous Plantation Woodland
- A1.3.2 Mixed Plantation Woodland
- A2.1 Dense/Continuous Scrub
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- B4 Improved Grassland
- B6 Poor Semi-improved Grassland
- C1.1 Continuous Bracken
- C3.1 Tall Ruderal
- F1 Swamp
- F2.1 Marginal Vegetation
- G1 Standing Water
- G2 Running Water
- J1.1 Arable
- J2.1.1 Intact Species-rich Hedgerow
- J2.2.1 Defunct Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- J2.4 Fence
- J2.5 Wall
- J2.6 Dry-ditch
- J3.6 Buildings
- Target Notes 2019
- Target Notes 2021

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Llanarth Estate

Cwm Pentref, Raglan, Monmouthshire

Extended Phase 1 Habitat Plan (2021)

E1885902/DR01 DJ MW 05 August 2021

soltysbrewster ECOLOGY

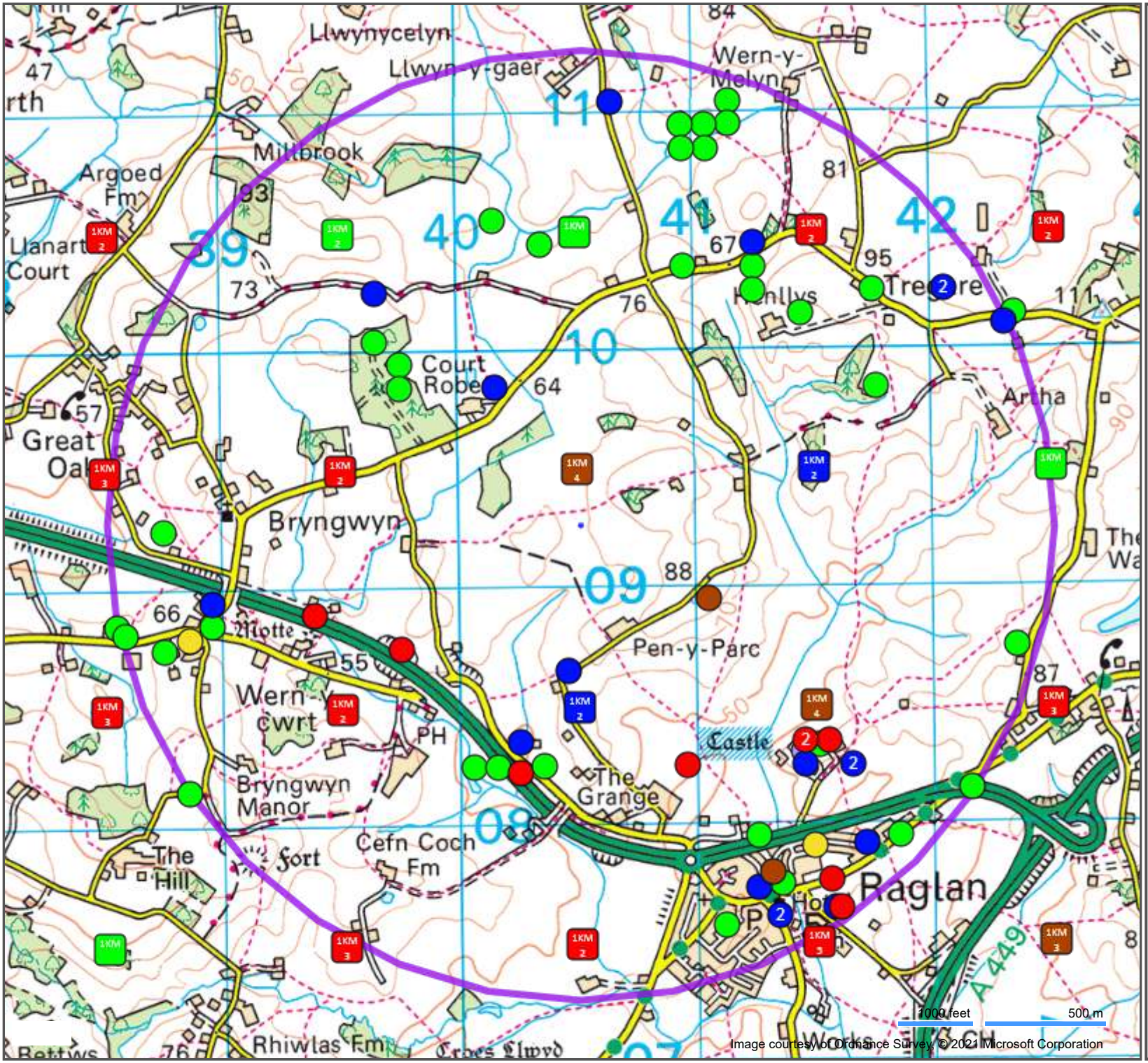
4 Stangate House
Stanwell Road
Penarth
Vale of Glamorgan
CF64 2AA

Tel: 033 00 13 00 12

Email: enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX III DESK STUDY INFORMATION RECEIVED FROM SEWBREC (2021)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CofnodionAmgylcheddol Lleol CYMRU

eMapper for LERC Wales Aderyn Commercial

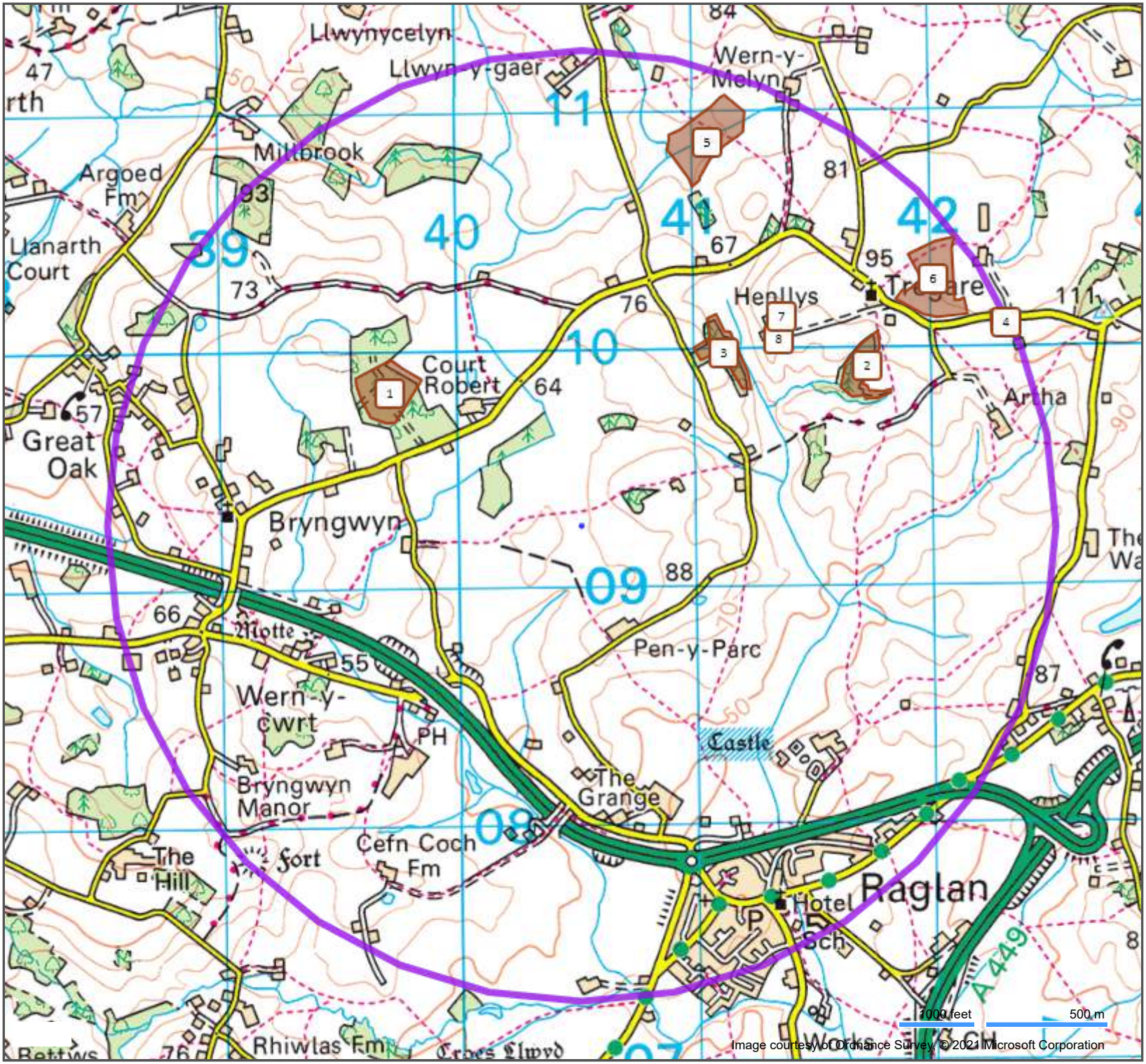
ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf Species Map (Public)

Key

- Search Location
- Search Buffer (2000m)

- **Bees, Wasps, Ants and Sawflies**
- **Birds**
- **Butterflies and Moths**
- **Mammals**
- **Other Invertebrates**
- **Plants**
- **Reptiles and Amphibians**



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDONIAMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

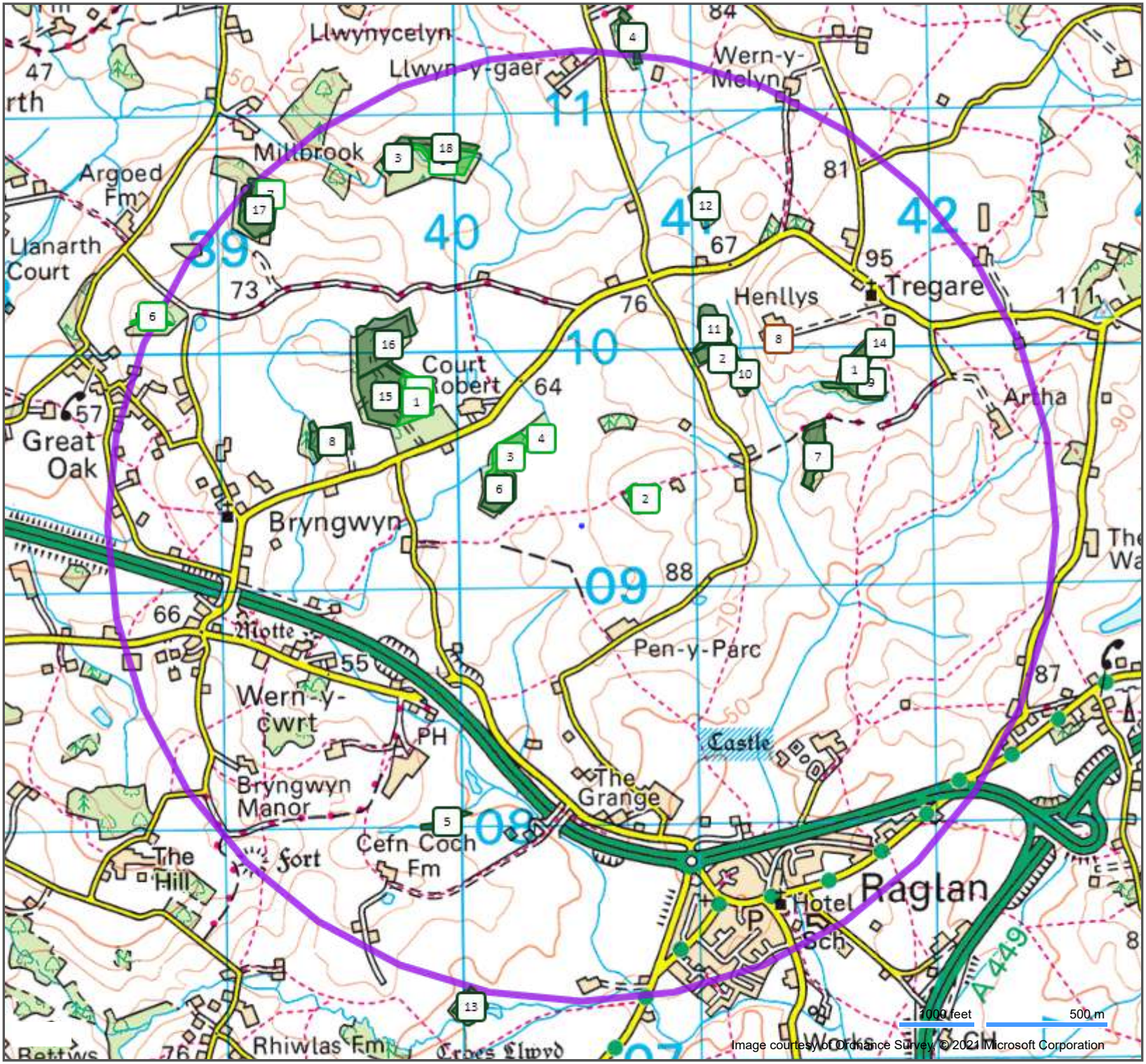
Cwm Pentraf Sites Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Adopted SINC

1. **1**: Coed Robert
2. **2**: Fforest Coed
3. **3**: Henllys Wood
4. **4**: Pen-Y-Walk Meadow
5. **5**: Wern Mellin
6. **6**: Parc-Y-Dert
7. **7**: Henllys Farm (Garden Orchard)
8. **8**: Henllys Farm (Main Orchard)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDIDIN AMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf ASNW Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Ancient Semi-natural Woodland

- **1**: Ancient Semi Natural Woodland
- **2**: Ancient Semi Natural Woodland
- **3**: Ancient Semi Natural Woodland
- **4**: Ancient Semi Natural Woodland
- **5**: Ancient Semi Natural Woodland
- **6**: Ancient Semi Natural Woodland
- **7**: Ancient Semi Natural Woodland
- **8**: Ancient Semi Natural Woodland
- **9**: Ancient Semi Natural Woodland
- **10**: Ancient Semi Natural Woodland
- **11**: Ancient Semi Natural Woodland
- **12**: Ancient Semi Natural Woodland
- **13**: Ancient Semi Natural Woodland
- **14**: Ancient Semi Natural Woodland
- **15**: Restored Ancient Woodland Site
- **16**: Restored Ancient Woodland Site
- **17**: Restored Ancient Woodland Site
- **18**: Restored Ancient Woodland Site

Plantation on Ancient Woodland Site

- **1**: Plantation on Ancient Woodland Site
- **2**: Plantation on Ancient Woodland Site
- **3**: Plantation on Ancient Woodland Site
- **4**: Plantation on Ancient Woodland Site
- **5**: Plantation on Ancient Woodland Site
- **6**: Plantation on Ancient Woodland Site
- **7**: Plantation on Ancient Woodland Site
- **8**: Plantation on Ancient Woodland Site

Adopted SINC

- **8**: Henllys Farm (Main Orchard)

APPENDIX IV 2024 SITE NOTES & ANNOTATED PLAN

Target Note	Description/Comment
***Birds seen/ heard**: House Sparrow Passer domesticus, Buzzard Buteo buteo, Barn Owl Tyto alba, Tawny Owl Strix Aluco, Great Tit Parus major, Pheasant Phasianus Colchicus, Red Kite Milvus milvus, Swallow Hirundo rustica, Herring Gull Larus Argentatus, Wood Pigeon Columba Palumbus, Carrion Crow Corvus Corone, Collared Dove Streptopelia decaocto and Wren Troglodytes troglodytes.* ***Other:** Roe Deer Capreolus capreolus and Speckled Wood Pararge aegeria & Large White Pieris brassicae butterflies.*	
Habitats	
1	Renevated bungalow at Wern-Y-Cwrt Farm. Building is in good condition with new roof and render – negligible roosting potental (previous TN30 in 2021 PEA report). Adjacent barn also considered unsuitable for roosting bats (no obvious features and very open/exposed inside), although Swallow are nesting within this structure. 
2	Area previously mapped as a swamp, surrounded by lines of broadleaved trees, hedgerows and dense scrub (previous TN29 in 2021 PEA report). This was found to be dry at the time of the current survey and contained ruderal species such as Hemlock Water-dropwort *Oenanthe crocata*, Common Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium* and Cow Parsnip *Anthriscus sylvestris*. Hedge Bindweed *Calystegia sepium* is also widespread. Several of the mature trees bordering this swamp have potential to support roosting bats.

	
3	Tree with roosting bat potential (see Target Note 20 in 2021 PEA). This tree was previously considered to hold moderate potential although its condition has since deteriated and now contains more potential roosting features. Now considered to hold high roosting potential (PRF-M). 
4	Tree with roosting bat potential (moderate potential/PRF-M – see Target Note 21 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above and landing within this tree during the current survey.

	
5	Tree with roosting bat potential (low potential/PRF-I – see Target Note 37 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above above and landing within this tree during the current survey. 
6	Dis-used barn found in Field Parcel 5 in eastern extent of the site (previous TN53 in 2021 PEA). The barn contains a Barn Owl box, which at the time of the 2021 survey visit, was occupied by Little Owl *Athene Noctua*. [redacted]  



7

[redacted]









8	Large pond found within parcel of plantation woodland ([redacted]. Pond is approx. 500m² in size and is heavily shaded by adjacent and overhanging trees including Willow, Elder *Sambucus nigra*, Oak *Quercus sp.*, Wych Elm *Ulmus glabra*, Sweet Chestnut *Castanea sativa,* Hawthorn *Crataegus monogyna* and unidentified pines. The banks of the pond are shallow and muddy, with sections densely vegetated by Bramble *Rubus fruticosus* scrub. No emergent vegetation noted, with the surface of the pond covered entirely by Duckweed *Lemna minor.* 
9	Pond found in parcel of plantation woodland immediately north of the candidate site (see Pond 5 in 2021 PEA). This pond was previously noted as being large in size (approx. 500-700m²) although was almost dry at the time of the current survey, with approx. 25m² of open water left. The pond is entirely shaded by the adjacent woodland and is choked by leaf litter and woody debris. Remaining water appears turbid. No aquatic or emergent vegetation noted. Banks are shallow and muddy and support mostly young Willow. 
10	Pond found in agricultural field parcel immediately north of the candidate site (see Pond 6 in 2021 PEA). This pond was completely dry at the time of the survey, with its basin entirely covered by ruderal vegetation. Species present indicate that the pond is still likely to hold water for at least part of the year and include Redshank *Persicaria maculosa*, Common Nettle, Fig-leaved Goosefoot *Chenopodium ficifolium*, Pale Persicaria *Persicaria lapathifolia*, Bittersweet *Solanum dulcamara* and American Willowherb *Epilobium ciliatum*. This pond was almost dried-out during the 2021 survey visit.

	
11	Pond found within small woodland parcel immediately north of candidate site boundary (see Pond 4 in 2021 PEA). This was found to be dry during the current survey although in 2021 was noted to be approx. 200-225m2 in size, with turbid water and large amounts of leaf litter. Yellow Iris *Iris pseudacorus* is still present around the pond's location, indicating it still holds water for at least part of the year. The pond is entirely shaded from the surrounding woodland, with shallow muddy banks that support dense Bramble scrub. 
12	Several well-worn mammal pathways and foraging signs were found throughout parcel of plantation woodland in northern extent of the site – these were indicative of Badger, with no evidence found to indicate they were instead made by other small mammals such as Rabbit *Oryctolagus cuniculus*. No setts were found in this woodland during the current survey. Cherry Laurel spreading in this wood.
13	Pond found on edge of plantation woodland in northern extent of the site (see Pond 2 in 2021 PEA). This pond has reduced in size since the 2021 survey visit, and now covers an area of approx. 100m^2. The pond is heavily shaded by surrounding Oaks and subsequently contains large amounts of leaf litter. No aquatic or emergent vegetation noted during current survey, although Yellow Iris and Water-Starwort *Callitriche sp*. were noted here in 2021. Water appears to be poor quality/turbid.

	
14	Pond in centre of field parcel 13 (see Pond 1 in 2021 PEA). This was completely dry at the time of the survey although in 2021 was noted as being approx. 400m² in size. The pond is partially shaded by Willow and Poplar *Populus sp*. scrub. Limited aquatic/emergent vegetation present, with bankside marginal vegetation comprising of Hemlock Water-dropwort, Soft Rush *Juncus effusus*, Common Spike-rush *Eleocharis palustris* and Trifid Bur-marigold *Bidens tripartite*. 2021 survey visit noted evidence to suggest major waterfowl impact. 
15	Tree with high roosting potential (PRF-M – see TN11 in 2021 PEA). Tree contains a bird of prey nest box. No evidence of use found during current survey e.g. feathers, droppings, pellets.

	
16	Tree with high roosting potential (PRF-M – see TN12 in 2021 PEA). A Tawny Owl emerged from this tree during the 2021 survey visit. Tawny Owl may still be nesting within this tree, with feathers found at the base of the tree and splashing/droppings noted along one of the main branches.  
17	Rabbit warren in small woodland copse.


Satellite Imagery © Google 2024

1305

Monmouthshire Housing Association (MHA) (LRM Planning)

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		Director
Organisation: (where relevant)	Monouthshire Housing Association	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018.

1.2 The consultation document includes a summary of the key issues facing the county along with a vision and objectives for the revised LDP, this includes new issues and opportunities which have arisen since the adoption of the current LDP. Of note, the document highlights that:

- Monmouthshire has the highest average house prices in Wales;
- Over 2,200 households require affordable housing;
- There is an ageing population with a shrinking economically active population;
- There is a need to tackle climate change and carbon reduction;
- There is an urgent need to respond to water quality and phosphate pollution issues;
- Employment opportunities are limited and Monmouthshire have a net outflow of commuters; and
- There are challenges of rural isolation and sustaining rural communities.

1.3 In recognition of the issues and challenges a vision is formed. The LDP Vision as outlined in the consultation document states that:

By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

• People are living in inclusive, equal, safe, cohesive, prosperous and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities.

• Communities and businesses are part of an economically thriving, ambitious and well-connected County.

• The best of the County's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.

• People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero carbon county.

1.4 In order to be able to achieve this vision a series of objectives are formed that align with Welsh Government well-being objectives. Of particular relevance to our client's development proposals are the following:

- Economic growth;
- Green infrastructure;
- Health and well-being;

- Opportunities for a younger population;
- Wide ranging choice of housing;
- Placemaking;
- Building resilient communities;
- Sustaining existing rural communities; and
- Responding to climate change.

1.5 It is considered that, the issues outlined above in particular can be addressed through the delivery of a robust pool of deliverable and suitable housing sites in appropriate locations. New housing, including affordable housing, built in sustainable towns and villages provides the opportunity to retain the younger generation in Monmouthshire, within communities which they have grown up.

1.6 Furthermore, development which meets high quality construction standards tackles issues of climate change through in whilst tackling climate change through high quality innovative design. Building new housing within sustainable rural settlements also creates a critical mass of population to support both existing and new facilities in these locations. Failure to address needs across the Authority will exacerbate trends towards an ageing population, lack of affordability and loss of younger people.

1.7 The Deposit Plan confirms that the Well Being of Future Generations (Wales) Act sets the framework for improving the well-being of Wales by ensuring that sustainable development is at the heart of government and public bodies. The Act puts in place a 'sustainable development principle' and places a well-being duty on public bodies, including local authorities to 'act in a manger which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs'.

1.8 The Plan importantly recognises that the Act has a major influence on all aspects of its preparation. The various previous submissions in respect of candidate sites (including the proposed allocation at Devauden) made in relation to land in our clients control sets out how these sites adhere to each of the Welsh Governments Wellbeing Objectives.

1.9 Finally, we believe that the Deposit Plan should reflect the Monmouthshire 2040: Growth and Ambition Statement which seeks to increase the availability of housing sites alongside identifying suitable employment land to provide differing residential products, to enable higher rates of jobs per dwelling.

1.10 Overall, our client supports the Vision and Objectives included in the document, and it is considered that with an appropriate Spatial Strategy the plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.

1.11 MHA support the Council's vision for Monmouthshire and confirm that their site at Devauden can help contribute towards this. It is noted that MHA have submitted other sites (that are not proposed to be allocated) that could also be made available if the need arises to identify further allocations.

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients support an approach that seeks to address the key challenges faced by rural communities with an appropriate level of growth across the most sustainable lower tier settlements. Our client supports the proposed distribution of development to smaller rural settlements such as Devauden and note that further sites in their control can help contribute.

1.3 The proposed proportion of growth to Caldicot is 35% and significantly higher than any other area. Unfortunately, this is likely to be at the expense of a more distributed approach that supports existing communities and delivers the Council's objectives to build resilient communities and to sustain existing rural communities. We consider the proposed distribution as drafted could be in conflict with some of the Council's own objectives including sustaining existing rural communities and we would suggest it should be revisited to find a more balanced distribution.

1.4 The strategy does not appear to fully appreciate the significant physical constraints which will limit the amount of development which can take place within the Severnside settlements. For instance constraints to delivery at Caldicot include flooding, the ecological and archaeological sensitivity of the Gwent Levels. It is therefore considered that the proportion of development allocated to each settlement tier should be reviewed on this basis.

SOURCES OF SUPPLY (TABLE 2)

Windfalls

1.5 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.6 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 units were refused due to loss of employment land;
- 18 units were refused due to phosphates;
- 16 units were withdrawn but may be resubmitted; and

- A number of others have alternative uses with no sign of a change of use application imminently.

1.7 Our clients site at Llandogo is likely to contribute as a windfall site as it lies within settlement boundaries and an application is imminent. However, we would question whether this should be an allocation given the certainty over the proposals.

1.8 Notwithstanding this, we believe that 230 is optimist given the constraints identified in the Urban Capacity Study and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.9 We welcome the approach taken towards the trajectory by the Council in general and confirm that land at Devauden can be made available earlier in the plan period subject to the completion of WWTW upgrades.

Flexibility allowance

1.10 It is noted that the previous LDP under delivered by 33% and as such it seems prudent to plan for a higher buffer particularly as any delays in sites due to matters such as phosphates could result in sites being pushed outside of the plan period. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.11 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.12 It is considered that should additional land be required, omission sites and those within settlement boundaries proposed by MHA can be identified as allocations.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Please refer to the representations on the following page.		

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY H2 – RESIDENTIAL DEVELOPMENT IN MAIN RURAL SETTLEMENTS

1.13 Our clients are supportive of the settlement boundaries as drawn at Llandogo. They confirm that an application is due to be submitted at land adjacent to Parklands which lies within the settlement boundary but question whether this should be an allocation given that there are no constraints to development.

POLICY H9– AFFORDABLE HOUSING EXCEPTION SITES

1.14 Our clients are generally supportive of the provision for rural exceptions, however consider that the wording of the policy ought to be more flexible. For instance, if a scheme for 11 dwellings at a Tier 3 settlement is shown to be sustainable and acceptable in planning terms then there ought to be provision for it to be approved rather than limited to 10. Indeed, this could be particular beneficial where there is an acute level of need.

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 10: Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 It is noted that our clients support policy HA14 – Land at Churchfields, Devauden, however, consider that it should come forward earlier in the plan period with the appropriate WWTW upgrade being prioritised in order to deliver the much needed homes. Background is set out below. Separate representations have been made by MHA in respect of other sites that they control.

Policy HA14 - Land at Churchfields, Devauden

1.2 We note that MHA support the allocation of the above site for 20 dwellings. It is noted that our client controls over 2ha of land to the west of Devauden off Churchfields, albeit circa 1 ha is being promoted for development at this stage, which will deliver the homes.

1.3 MHA considers that this development opportunity is considered to represent proportionate growth in line with the Council's strategy and will provide much needed affordable homes to serve the local community of Devauden.

1.4 The development will help support and benefit from existing services within the settlement contributing towards a sustainable and resilient community.

1.5 The development would follow the successful example made by our client at Wells Lane, where MHA delivered a high quality affordable led housing scheme which comprised 60 % affordable and 40% open market homes.

1.6 MHA would welcome the site being delivering earlier in the plan period subject to WWTW upgrades and confirm that an application could be submitted to ensure delivery earlier in the period. Indeed, a significant amount of background work has been undertaken on the site including in respect of:

- Development Framework Document setting out illustrative master planning proposals and principles;
- Viability Appraisal;
- Ecology Report;
- Tree Survey;
- Landscape and Visual Impact Statement;
- Heritage Statement;
- Transport Statement;
- Engineering Report and
- ALC.

1.7 These have culminated in the proposals which comprise:

- 20 new dwellings, including 50% affordable housing;
- Primary access and egress from Churchfields;
- An attenuation basin and wildlife corridor along the western boundary;

- On site Public Open Space and an area of greenery on arrival; and
- Pedestrian access throughout the site, with a connection to the south presenting opportunities for use of existing PRoWs.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.8 It is considered that Policy HA14 could come forward earlier in the plan period and provision should be made by Welsh Water to upgrade the WWTW earlier than anticipated to deliver the much needed affordable homes.

1.9 It is also considered that should additional land be required then the omission sites and sites within settlement boundaries as proposed by MHA should be identified as allocations. In particular:

- Land adj Berthon Rd, Little Mill (CS0103);
- Land adj to Parklands Llandogo (CS010); and
- Land at Llanellen (CS0215).

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? x		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question three, nine & ten: It is considered that in if additional land is required, then further allocations could be provided on other sites submitted by MHA as candidate sites.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Monouthshire Housing Association	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018.

1.2 The consultation document includes a summary of the key issues facing the county along with a vision and objectives for the revised LDP, this includes new issues and opportunities which have arisen since the adoption of the current LDP. Of note, the document highlights that:

- Monmouthshire has the highest average house prices in Wales;
- Over 2,200 households require affordable housing;
- There is an ageing population with a shrinking economically active population;
- There is a need to tackle climate change and carbon reduction;
- There is an urgent need to respond to water quality and phosphate pollution issues;
- Employment opportunities are limited and Monmouthshire have a net outflow of commuters; and
- There are challenges of rural isolation and sustaining rural communities.

1.3 In recognition of the issues and challenges a vision is formed. The LDP Vision as outlined in the consultation document states that:

By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:

• People are living in inclusive, equal, safe, cohesive, prosperous and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities.

• Communities and businesses are part of an economically thriving, ambitious and well-connected County.

• The best of the County's built heritage, countryside, biodiversity, landscape and environmental assets have been protected and enhanced to retain its distinctive character.

• People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero carbon county.

1.4 In order to be able to achieve this vision a series of objectives are formed that align with Welsh Government well-being objectives. Of particular relevance to our client's development proposals are the following:

- Economic growth;
- Green infrastructure;
- Health and well-being;

- Opportunities for a younger population;
- Wide ranging choice of housing;
- Placemaking;
- Building resilient communities;
- Sustaining existing rural communities; and
- Responding to climate change.

1.5 It is considered that, the issues outlined above in particular can be addressed through the delivery of a robust pool of deliverable and suitable housing sites in appropriate locations. New housing, including affordable housing, built in sustainable towns and villages provides the opportunity to retain the younger generation in Monmouthshire, within communities which they have grown up.

1.6 Furthermore, development which meets high quality construction standards tackles issues of climate change through in whilst tackling climate change through high quality innovative design. Building new housing within sustainable rural settlements also creates a critical mass of population to support both existing and new facilities in these locations. Failure to address needs across the Authority will exacerbate trends towards an ageing population, lack of affordability and loss of younger people.

1.7 The Deposit Plan confirms that the Well Being of Future Generations (Wales) Act sets the framework for improving the well-being of Wales by ensuring that sustainable development is at the heart of government and public bodies. The Act puts in place a 'sustainable development principle' and places a well-being duty on public bodies, including local authorities to 'act in a manger which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs'.

1.8 The Plan importantly recognises that the Act has a major influence on all aspects of its preparation. The various previous submissions in respect of candidate sites (including the proposed allocation at Devauden) made in relation to land in our clients control sets out how these sites adhere to each of the Welsh Governments Wellbeing Objectives.

1.9 Finally, we believe that the Deposit Plan should reflect the Monmouthshire 2040: Growth and Ambition Statement which seeks to increase the availability of housing sites alongside identifying suitable employment land to provide differing residential products, to enable higher rates of jobs per dwelling.

1.10 Overall, our client supports the Vision and Objectives included in the document, and it is considered that with an appropriate Spatial Strategy the plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.

1.11 MHA support the Council's vision for Monmouthshire and confirm that their site at Devauden can help contribute towards this. It is noted that MHA have submitted other sites (that are not proposed to be allocated) that could also be made available if the need arises to identify further allocations.

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients support an approach that seeks to address the key challenges faced by rural communities with an appropriate level of growth across the most sustainable lower tier settlements. Our client supports the proposed distribution of development to smaller rural settlements such as Devauden and note that further sites in their control can help contribute.

1.3 The proposed proportion of growth to Caldicot is 35% and significantly higher than any other area. Unfortunately, this is likely to be at the expense of a more distributed approach that supports existing communities and delivers the Council's objectives to build resilient communities and to sustain existing rural communities. We consider the proposed distribution as drafted could be in conflict with some of the Council's own objectives including sustaining existing rural communities and we would suggest it should be revisited to find a more balanced distribution.

1.4 The strategy does not appear to fully appreciate the significant physical constraints which will limit the amount of development which can take place within the Severnside settlements. For instance constraints to delivery at Caldicot include flooding, the ecological and archaeological sensitivity of the Gwent Levels. It is therefore considered that the proportion of development allocated to each settlement tier should be reviewed on this basis.

SOURCES OF SUPPLY (TABLE 2)

Windfalls

1.5 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.6 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 units were refused due to loss of employment land;
- 18 units were refused due to phosphates;
- 16 units were withdrawn but may be resubmitted; and

- A number of others have alternative uses with no sign of a change of use application imminently.

1.7 Our clients site at Llandogo is likely to contribute as a windfall site as it lies within settlement boundaries and an application is imminent. However, we would question whether this should be an allocation given the certainty over the proposals.

1.8 Notwithstanding this, we believe that 230 is optimist given the constraints identified in the Urban Capacity Study and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.9 We welcome the approach taken towards the trajectory by the Council in general and confirm that land at Devauden can be made available earlier in the plan period subject to the completion of WWTW upgrades.

Flexibility allowance

1.10 It is noted that the previous LDP under delivered by 33% and as such it seems prudent to plan for a higher buffer particularly as any delays in sites due to matters such as phosphates could result in sites being pushed outside of the plan period. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.11 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.12 It is considered that should additional land be required, omission sites and those within settlement boundaries proposed by MHA can be identified as allocations.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Please refer to the representations on the following page.		

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY H2 – RESIDENTIAL DEVELOPMENT IN MAIN RURAL SETTLEMENTS

1.13 Our clients are supportive of the settlement boundaries as drawn at Llandogo. They confirm that an application is due to be submitted at land adjacent to Parklands which lies within the settlement boundary but question whether this should be an allocation given that there are no constraints to development.

POLICY H9– AFFORDABLE HOUSING EXCEPTION SITES

1.14 Our clients are generally supportive of the provision for rural exceptions, however consider that the wording of the policy ought to be more flexible. For instance, if a scheme for 11 dwellings at a Tier 3 settlement is shown to be sustainable and acceptable in planning terms then there ought to be provision for it to be approved rather than limited to 10. Indeed, this could be particular beneficial where there is an acute level of need.

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 10: Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 It is noted that our clients support policy HA14 – Land at Churchfields, Devauden, however, consider that it should come forward earlier in the plan period with the appropriate WWTW upgrade being prioritised in order to deliver the much needed homes. Background is set out below. Separate representations have been made by MHA in respect of other sites that they control.

Policy HA14 - Land at Churchfields, Devauden

1.2 We note that MHA support the allocation of the above site for 20 dwellings. It is noted that our client controls over 2ha of land to the west of Devauden off Churchfields, albeit circa 1 ha is being promoted for development at this stage, which will deliver the homes.

1.3 MHA considers that this development opportunity is considered to represent proportionate growth in line with the Council's strategy and will provide much needed affordable homes to serve the local community of Devauden.

1.4 The development will help support and benefit from existing services within the settlement contributing towards a sustainable and resilient community.

1.5 The development would follow the successful example made by our client at Wells Lane, where MHA delivered a high quality affordable led housing scheme which comprised 60 % affordable and 40% open market homes.

1.6 MHA would welcome the site being delivering earlier in the plan period subject to WWTW upgrades and confirm that an application could be submitted to ensure delivery earlier in the period. Indeed, a significant amount of background work has been undertaken on the site including in respect of:

- Development Framework Document setting out illustrative master planning proposals and principles;
- Viability Appraisal;
- Ecology Report;
- Tree Survey;
- Landscape and Visual Impact Statement;
- Heritage Statement;
- Transport Statement;
- Engineering Report and
- ALC.

1.7 These have culminated in the proposals which comprise:

- 20 new dwellings, including 50% affordable housing;
- Primary access and egress from Churchfields;
- An attenuation basin and wildlife corridor along the western boundary;

- On site Public Open Space and an area of greenery on arrival; and
- Pedestrian access throughout the site, with a connection to the south presenting opportunities for use of existing PRoWs.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.8 It is considered that Policy HA14 could come forward earlier in the plan period and provision should be made by Welsh Water to upgrade the WWTW earlier than anticipated to deliver the much needed affordable homes.

1.9 It is also considered that should additional land be required then the omission sites and sites within settlement boundaries as proposed by MHA should be identified as allocations. In particular:

- Land adj Berthon Rd, Little Mill (CS0103);
- Land adj to Parklands Llandogo (CS010); and
- Land at Llanellen (CS0215).

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? x		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question three, nine & ten: It is considered that in if additional land is required, then further allocations could be provided on other sites submitted by MHA as candidate sites.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

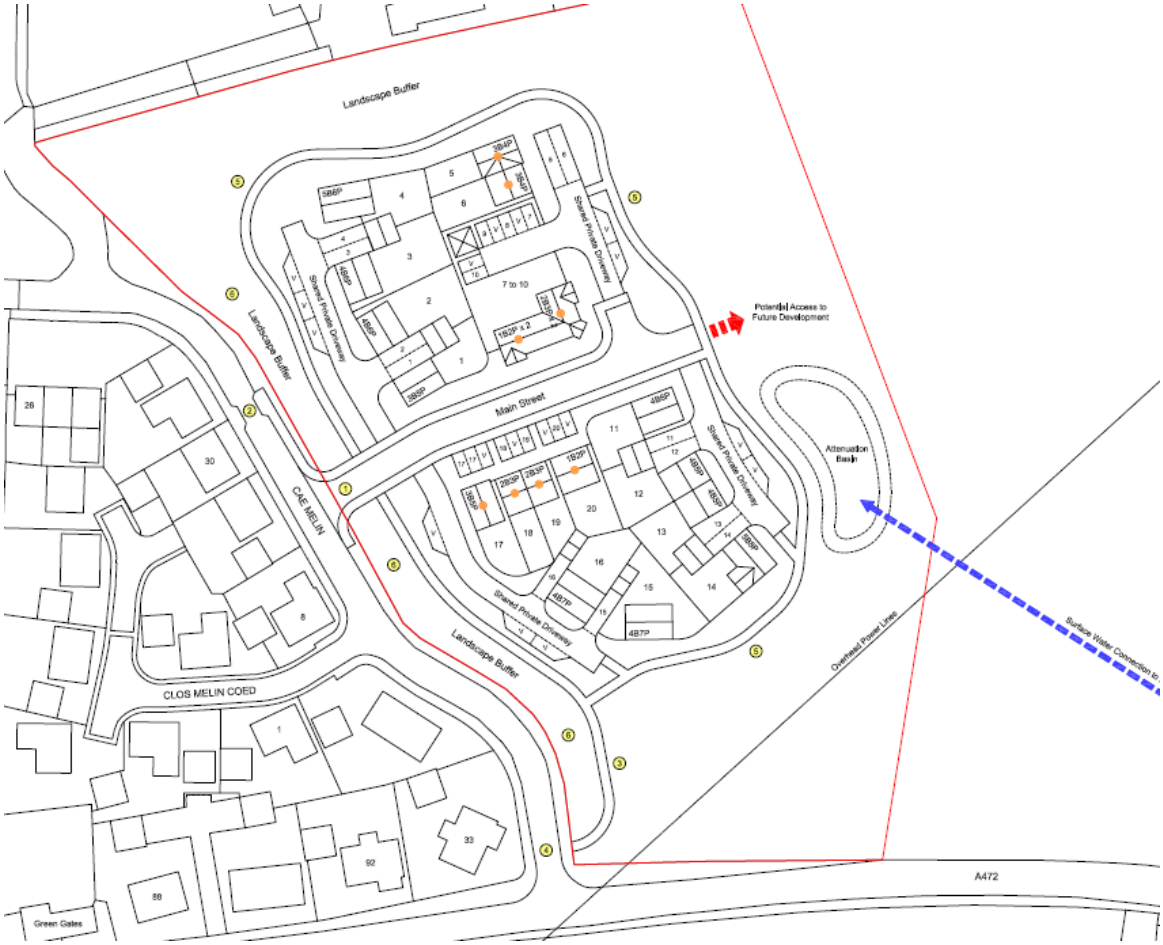
The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1428

BB3 Limited

Professional Representations to Monmouthshire RLDP Draft Deposit Plan & Site Representations for Site HA15 - Land East of Little Mill

Date: 19th November, 2024
On behalf of: BB3 Limited
Prepared by: Powells (As site promoter)



General Comments on the Draft RLDP

These representations provide constructive feedback on Monmouthshire's Replacement Local Development Plan (RLDP) Draft Deposit Plan, with the aim of ensuring it meets the statutory **Tests of Soundness** and is robust for examination and final adoption. The submissions also set forward the summary of why site HA15 (Land East of Little Mill) should continue to be supported as an allocation through to adoption of the RLDP.

Positive Aspects of the Draft RLDP

1. **Alignment with National and Regional Strategies:**
    - The RLDP demonstrates strong alignment with **Future Wales 2040** and **Planning Policy Wales (PPW12)** in promoting sustainability, affordable housing, and rural community support.
    - It reflects the objectives of the **Cardiff Capital Region City Deal**, particularly in enhancing connectivity and fostering rural economic growth.
2. **Focus on Sustainability and Placemaking:**
    - The plan prioritises green infrastructure, active travel, and net-zero carbon goals, aligning with national commitments to environmental sustainability.
    - Placemaking principles are embedded in many site allocations, promoting community integration and local vibrancy.
3. **Addressing Housing Needs:**
    - The RLDP acknowledges Monmouthshire's affordability challenges and includes policies to increase the supply of affordable housing.

Key Areas for Improvement

1. **Clarity on Delivery Mechanisms:**
    - The RLDP lacks sufficient detail on how infrastructure improvements will be funded and delivered, which could undermine the deliverability of key allocations.
2. **Integration of Specific Policies:**
    - Greater emphasis on policies such as **Future Wales Policy 5 (Supporting the Rural Economy)** would enhance the RLDP's ability to demonstrate the connection between rural housing growth and economic sustainability.
3. **Contingency Planning:**
    - The RLDP should include clearer contingency measures to address potential under-delivery of housing or employment land within the plan period to prevent stagnation should any of the allocations fail to come forward in unforeseen circumstances.

4. **Community Engagement:**
    - Continued consultation with local stakeholders, particularly on rural site allocations, will ensure community support and alignment with local needs.

Justification for the Allocation of Site HA15 - Land East of Little Mill

Site HA15 is uniquely positioned to contribute to Monmouthshire's strategic objectives by delivering 20 dwellings (50% affordable) in a sustainable, accessible, and community-focused manner. The following provides a robust justification for its allocation.

Sustainability and Deliverability

1. **Proximity to Amenities and Active Travel Routes:**
    - The site is well-located within walking and cycling distance of key amenities in Little Mill, including the local school, park, and shops.
    - Its position supports active travel and reduces reliance on private vehicles, aligning with Monmouthshire's sustainability objectives.
2. **Infrastructure Readiness:**
    - The site benefits from proximity to existing utilities, including a mains sewer and surface water drainage capacity, minimising the need for extensive infrastructure upgrades.
    - Road access is straightforward, requiring only minor improvements to accommodate additional traffic.
3. **Environmental Considerations:**
    - The site is currently agricultural land with low ecological sensitivity, ensuring minimal biodiversity loss.
    - Opportunities for biodiversity enhancement, such as native tree planting and wildlife corridors, can be incorporated into the design to achieve net biodiversity gain.

Alignment with RLDP Objectives

Objective 9 (Demography)

The proposed development at Site HA15: Land East of Little Mill plays a critical role in addressing Monmouthshire's demographic challenges, particularly its aging population and the decline of younger age groups within rural communities. By delivering a mix of housing types tailored to the needs of younger families, professionals, and key workers, the development supports a more age-balanced population, ensuring the long-term sustainability of Little Mill and the wider county.

Attracting Younger Families and Key Workers

1. **Reversing Population Imbalance:**
    - Monmouthshire faces a significant demographic challenge, with a disproportionately high proportion of older residents compared to the national

average. This trend impacts the vibrancy and economic viability of rural communities like Little Mill.

- The development offers an opportunity to attract younger families and individuals, particularly key workers, who are vital for sustaining local services such as schools, healthcare, and small businesses.

2. **Providing Housing Suitable for Young Residents:**
    - The proposed development includes starter homes, affordable housing units, and family-sized homes, making it accessible to first-time buyers, growing families, and professionals who might otherwise be priced out of the local housing market.
    - By offering modern, energy-efficient homes at a range of price points, the development appeals to a demographic that values sustainable, high-quality housing.
3. **Supporting Local Workforce Needs:**
    - Key workers, including teachers, healthcare professionals, and public service employees, are integral to the functioning of rural communities but often struggle to find affordable and appropriate housing near their place of work. This development directly addresses this issue by including affordable units specifically designed for this demographic.

Ensuring Accessibility for a Diverse Range of Residents

1. **Affordable Housing Provision:**
    - A meaningful proportion of the proposed 20 dwellings will be allocated as affordable housing, ensuring that individuals and families on lower incomes can access high-quality homes. This aligns with Monmouthshire's strategic objective to increase the supply of affordable homes in rural areas.
    - The inclusion of affordable units supports a socially inclusive community, providing opportunities for young professionals, single-parent households, and downsizers to live in Little Mill.
2. **Diverse Housing Mix:**
    - The development includes a range of housing types to meet the varied needs of the population, such as:
        - **Starter Homes:** Ideal for young professionals or couples looking to enter the housing market.
        - **Family Homes:** Designed to accommodate growing families with features such as gardens and proximity to local schools and parks.

- **Downsizer-Friendly Homes:** Single-story or smaller properties cater to older residents looking to remain in the community while freeing up larger homes for younger families.

3. **Reducing Outmigration of Younger Generations:**
    - The lack of suitable and affordable housing has led to an outmigration of younger generations from Monmouthshire, particularly in rural areas. This development directly counters that trend by creating opportunities for younger residents to remain in or return to Little Mill, contributing to the sustainability of the local community.

Social and Economic Contributions of a Balanced Demographic

1. **Sustaining Local Facilities and Services:**
    - Younger families and key workers bring vitality and economic activity, supporting local services such as schools, shops, and recreational facilities, which are often at risk of underutilisation in aging communities.
    - By increasing demand for these services, the development helps ensure their viability for the future.
2. **Fostering Intergenerational Communities:**
    - A balanced demographic fosters a vibrant, intergenerational community where younger residents benefit from the experience and resources of older residents, while older residents benefit from the economic and social contributions of younger generations.
    - The integration of a range of housing types ensures that residents from diverse age groups and backgrounds can live, work, and thrive together.

Section Conclusion

The development at Site HA15 is uniquely positioned to address Monmouthshire's aging demographic by attracting younger families, professionals, and key workers. Its focus on providing a mix of housing types, including affordable options, ensures accessibility for a diverse range of residents. By rebalancing the population and supporting the sustainability of local services and facilities, the development directly contributes to Monmouthshire's strategic objectives and strengthens the long-term resilience of Little Mill.

1. **<u>Objective 10 (Housing):</u>**

The proposed development at Site HA15: Land East of Little Mill directly addresses Monmouthshire's pressing housing needs by delivering 20 new dwellings, with a meaningful 50% proportion allocated for affordable housing. The carefully planned housing mix ensures inclusivity and meets the diverse needs of the community, supporting the long-term sustainability and vitality of Little Mill.

Meeting Local Housing Needs

1. **Addressing the Housing Shortfall:**
    - Monmouthshire faces a significant housing shortfall, particularly in rural areas like Little Mill, where supply has not kept pace with demand. This development provides 20 additional homes, helping to alleviate the housing pressures identified in the RLDP.
    - The development aligns with Monmouthshire's strategy to prioritise housing delivery in sustainable rural settlements, ensuring homes are built where they are needed most.
2. **Delivering Affordable Housing:**
    - A meaningful proportion of the proposed dwellings will be allocated as affordable housing, meeting local demand for low-cost homes and providing opportunities for key workers, young families, and individuals on modest incomes to settle in Little Mill.
    - The affordable housing provision supports the RLDP's strategic housing targets and demonstrates a commitment to addressing Monmouthshire's affordability challenges, particularly in rural areas where affordability gaps are more acute.
3. **Sustaining Community Vitality:**
    - The new housing will attract a diverse range of residents, including young families, professionals, and older downsizers, who will contribute to the social and economic vibrancy of Little Mill.
    - By increasing the local population, the development helps sustain essential community services such as schools, shops, and public transport, ensuring their viability for future generations.

Ensuring a Balanced and Sustainable Housing Mix

1. **Starter Homes for First-Time Buyers:**
    - The inclusion of starter homes provides an entry point for first-time buyers who may otherwise struggle to access the housing market in Little Mill. These homes are designed to be affordable, practical, and energy-efficient, appealing to young professionals and couples.

2. **Family Homes:**
    - A significant proportion of the housing will cater to growing families, offering larger homes with gardens and proximity to local amenities such as schools and parks. These homes are essential for retaining families within the village, ensuring the community remains vibrant and sustainable.
    - The family-oriented housing mix also supports Monmouthshire's objective of creating communities where children and young people can thrive.
3. **Homes for Downsizers:**
    - The development includes homes suitable for older residents looking to downsize without leaving the community. These homes, often single-story or smaller properties, provide an ideal solution for those wishing to remain close to family and friends while freeing up larger homes for younger families.
    - By catering to downsizers, the development creates a natural housing flow, reducing bottlenecks in the housing market and ensuring efficient use of existing housing stock.

Sustainability and Community Integration

1. **Environmentally Conscious Housing:**
    - The new homes will be built to modern energy efficiency standards, incorporating sustainable design features such as renewable energy systems, efficient insulation, and water-saving measures. These features align with Monmouthshire's commitment to reducing carbon emissions and promoting sustainable living.
2. **Active Travel and Accessibility:**
    - The development is within walking and cycling distance of Little Mill's key amenities, including shops, the local school, and recreational spaces. This ensures residents can easily access services without relying on private vehicles, supporting active travel and reducing the carbon footprint of the community.
3. **Integration with Existing Community:**
    - The housing layout is designed to complement the existing village character, with green buffers and landscaping that ensure visual harmony with the surrounding countryside. Shared public spaces encourage interaction between new and existing residents, fostering a cohesive and inclusive community.

Supporting the Long-Term Vitality of Little Mill

1. **Boosting Local Services and Economy:**
    - The increase in population will support local services, ensuring they remain viable. Schools, shops, and recreational facilities in Little Mill will benefit from the additional demand generated by the new residents.
    - The construction of the development will also provide short-term economic benefits, creating jobs for local builders and contractors.
2. **Enhancing Community Resilience:**
    - A diverse and balanced housing mix ensures that Little Mill remains a resilient and adaptable community, capable of meeting the needs of residents at all life stages. This strengthens the village's identity and sustainability in the long term.

Section Conclusion

The proposal for 20 dwellings at Site HA15 directly addresses Monmouthshire's housing objectives by providing a balanced mix of homes that meet local needs, from starter homes for first-time buyers to family and downsizer-friendly properties. The inclusion of affordable housing ensures accessibility for a broad demographic, while the focus on sustainability and community integration supports the vitality of Little Mill. This development is a vital step in meeting Monmouthshire's housing challenges and achieving the RLDP's long-term goals.

2. Objective 11 (Placemaking):

The proposed development at Site HA15: Land East of Little Mill embodies the principles of high-quality placemaking by integrating green spaces, active travel connections, and thoughtful design. This ensures that the development enhances the village's vibrancy while preserving its rural identity. By prioritising community integration and environmental harmony, the proposal aligns directly with Monmouthshire's commitment to sustainable and inclusive growth.

Creating a Strong Sense of Place

1. **Incorporating Green Spaces:**
    - The development includes well-designed green spaces that serve as focal points for the community, promoting recreation, social interaction, and well-being.
    - These green areas also support biodiversity by incorporating native planting, wildlife corridors, and ecological features such as hedgerows and wildflower meadows, ensuring a balance between development and nature.
2. **Active Travel Connections:**

- The proposal prioritises walkability and cycling, with safe and accessible pathways connecting residents to key village amenities such as the local school, park, and shops.
- By reducing reliance on cars, these connections promote healthier lifestyles, reduce carbon emissions, and enhance the overall sustainability of the community.

3. **Public Spaces for Community Interaction:**
    - Shared public spaces, such as play areas or small community gardens, encourage interaction between new and existing residents, fostering a sense of belonging and inclusion.
    - These spaces are designed to be multifunctional, accommodating a variety of age groups and activities, from family gatherings to quiet reflection.

Respecting and Enhancing the Character of Little Mill

1. **Design that Complements the Rural Identity:**
    - The architectural style and layout of the development are carefully designed to reflect the existing character of Little Mill, ensuring visual harmony between new and existing buildings.
    - Features such as pitched roofs, traditional materials, and sympathetic landscaping help the development integrate seamlessly into the village.
2. **Preserving the Rural Setting:**
    - Green buffers around the site act as a visual and physical transition between the new housing and the surrounding countryside, protecting the rural views that are integral to Little Mill's identity.
    - Open spaces are positioned to enhance the sense of openness and maintain the village's rural charm.
3. **Thoughtful Layout to Minimise Impact:**
    - The layout is designed to reduce visual impact by positioning homes in clusters that respect the natural topography and existing field boundaries.
    - Streets and pathways are designed to prioritize pedestrians and cyclists, creating a safe and welcoming environment for all residents.

Enhancing Vibrancy and Community Integration

1. **Strengthening Village Identity:**
    - The development is designed to contribute positively to Little Mill's sense of identity by enhancing its vibrancy with new residents and thoughtfully designed spaces.
    - It incorporates elements of local heritage and traditional design, creating a strong connection between the new homes and the existing village fabric.
2. **Encouraging Social Cohesion:**
    - The mix of housing types and public spaces promotes interaction between diverse groups of residents, fostering an inclusive and cohesive community.
    - Features such as shared gardens, community seating areas, and pedestrian pathways encourage casual interactions, helping to integrate new residents into the village.
3. **Supporting Local Services and Amenities:**
    - By increasing the population, the development contributes to the sustainability of Little Mill's local services, including schools, shops, and recreational facilities.
    - The vibrancy added by the new residents ensures that these amenities remain viable and continue to serve the entire community.

Promoting Sustainable Living

1. **Energy-Efficient Homes:**
    - Homes are designed to meet modern energy efficiency standards, incorporating renewable energy technologies such as solar panels and heat pumps.
    - These features reduce energy consumption and utility costs for residents, supporting Monmouthshire's net-zero carbon goals.
2. **Integration of Nature and Built Environment:**
    - The development incorporates nature-friendly design features, such as rain gardens and sustainable drainage systems, to manage water flow and reduce flood risk while enhancing the aesthetic value of the site.
    - Native planting throughout the site ensures a harmonious integration with the surrounding landscape, contributing to the rural character of Little Mill.

Section Summary

The development at Site HA15 exemplifies high-quality placemaking by incorporating green spaces, active travel connections, and thoughtful design that respects the rural character of Little Mill. By fostering a strong sense of place and community integration, the proposal enhances the village's vibrancy while preserving its identity. This careful balance between growth and preservation ensures that the development aligns with Objective 11 and Monmouthshire's broader strategic goals for sustainable and inclusive communities.

Placemaking and Design

The proposed development at Site HA15: Land East of Little Mill has been designed with a focus on high-quality placemaking and integration with the existing settlement. It prioritises community cohesion, rural character preservation, and sustainability. By incorporating shared spaces and thoughtful design features, the development ensures it enhances the village's character and fosters a strong sense of community.

Integration with the Existing Settlement

Seamless Connection to the Village:

The site's layout has been carefully planned to integrate seamlessly with the existing fabric of Little Mill. The design respects the village's rural character and avoids creating a disconnected or intrusive addition to the settlement.

Homes are positioned to complement the existing built environment, ensuring continuity in scale, form, and appearance. This approach ensures the development feels like a natural extension of the village.

Green Buffers and Landscaping:

The inclusion of green buffers around the development ensures a gradual and harmonious transition between the built environment and the surrounding countryside.

Landscaping features, such as tree planting, hedgerows, and wildflower areas, not only enhance the visual appeal of the development but also contribute to its ecological value. These green elements help to preserve the village's rural identity while providing visual screening for existing and new residents.

Preservation of Local Views:

The layout has been designed to minimise any impact on key views of the surrounding countryside. By keeping the building heights and density sympathetic to the local context, the rural vistas that define Little Mill are preserved.

Prioritising Pedestrians and Cyclists:

Streets and pathways within the development are designed to prioritise pedestrian and cyclist safety, creating a more accessible and walkable environment. These connections also provide links to the wider village, encouraging active travel and reducing reliance on cars.

Community Cohesion

Encouraging Interaction and Inclusivity:

The development incorporates shared public spaces such as small parks, seating areas, or communal green spaces, designed to foster interaction between residents. These spaces provide opportunities for informal gatherings, recreational activities, and community events, helping to build a sense of belonging among both new and existing residents.

- The shared spaces are accessible and inclusive, accommodating the needs of residents of all ages and abilities, from young families to older adults.
- **Strengthening Community Bonds:**

  By offering areas where residents can come together, the development actively promotes social cohesion. New residents are encouraged to integrate into the existing village community, creating a sense of unity and collaboration.

  Features such as shared gardens or play areas are positioned to encourage spontaneous interactions, fostering an open and welcoming atmosphere within the development.
- **Design Supporting Social Connectivity:**

  The layout of the development is designed to naturally facilitate connectivity between homes and communal areas. This ensures that residents feel connected to one another and to the broader Little Mill community.

  Pathways and green corridors linking the new homes to village amenities provide a sense of continuity and integration, ensuring the development feels like a cohesive part of the settlement.
- **Balancing Privacy and Community:**
  - While encouraging interaction, the design also respects the need for privacy by carefully positioning homes and landscaping features. This balance ensures that the development provides a high quality of life for all residents.
- **Section Conclusion**
  - The design and placemaking approach for Site HA15 prioritises integration with the existing settlement and community cohesion. By incorporating green buffers, shared spaces, and thoughtful design features, the development maintains Little Mill's rural character while fostering a strong and inclusive community. This careful attention to detail ensures that the development supports Monmouthshire's broader objectives for sustainable and community-focused growth.

Conclusion

The proposed allocation of Site HA15: Land East of Little Mill offers a unique opportunity to deliver sustainable, high-quality housing that aligns with Monmouthshire's strategic objectives and addresses key local needs. The site's location, design, and commitment to placemaking ensure it complements the character of Little Mill while supporting its long-term vitality.

The development delivers significant benefits, including:

- **Demographic Balance:** Attracting younger families, professionals, and key workers to address Monmouthshire's aging population challenges.
- **Meeting Housing Needs:** Providing 20 dwellings, with a meaningful proportion allocated to affordable housing, ensuring inclusivity and accessibility for a diverse range of residents.
- **Community Cohesion:** Incorporating shared public spaces and active travel connections to foster a strong sense of community and social integration.
- **Environmental Sustainability:** Preserving the village's rural identity through green buffers, landscaping, and sustainable design features, while enhancing biodiversity and minimising ecological impact.
- **Economic and Social Benefits:** Supporting local services, businesses, and facilities through an increased population, while creating job opportunities during the construction phase.

By integrating seamlessly with the existing settlement and prioritising sustainable design, Site HA15 ensures Little Mill remains a vibrant and thriving community. This proposal directly supports Monmouthshire's objectives for housing delivery, demographic rebalancing, and placemaking, making it a robust and justified allocation within the RLDP.

The allocation of Site HA15 will contribute positively to Monmouthshire's vision for sustainable growth and inclusive communities, and we strongly encourage its retention within the RLDP.

1472

Powells

Powells

Singleton Court Business Park
Wonastow Road
Monmouth
NP25 5JA

[redacted]

Our Reference: SGL/PRE

10th December 2024

Planning Policy Team
Monmouthshire County Council
County Hall
The Rhadyr
Usk
Monmouthshire
NP15 1GA

Dear Sir/Madam,

SUBMISSION OF REPRESENTATIONS TO MONMOUTHSHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN DRAFT DEPOSIT CONSULTATION

I am writing to formally submit professional representations to the Monmouthshire Replacement Local Development Plan (RLDP) Draft Deposit consultation on behalf of my clients. The representations relate to the following sites:

1. **Draft Allocation HA18 - Shirenewton (Residential)**
2. **Draft Allocation HA15 - Land West of Little Mill (Residential)**
3. **Candidate Site CS0168 - Land West of Rogiet (Residential)**
4. **Draft Allocation EA1J - Land West of Raglan (Employment)**

These representations provide detailed feedback on the soundness of the RLDP in relation to the proposed allocations, ensuring alignment with statutory requirements and Monmouthshire's strategic objectives. They also include robust justifications for the respective site allocations, addressing considerations such as sustainability, deliverability, and alignment with regional and national planning policies.

The submission deadline for the consultation is December 16, 2024, and as such, these representations are duly submitted within the specified timeframe.

Should the Council require any further information or clarification regarding any aspect of these submissions, please do not hesitate to contact me. I would be happy to assist and provide additional details as necessary.

Yours faithfully,

[redacted]

For and on behalf of Powells
Chartered Surveyors | Land & Estate Agents | Property Consultants | Land Promotion

Email: [redacted]
Mobile:

Encs: Reps - Draft Allocation HA18 - Shirenewton (Residential)
Reps - Draft Allocation HA15 - Land West of Little Mill (Residential)
Reps - Candidate Site CS0168 - Land West of Rogiet (Residential)
Reps Draft Allocation EA1J - Land West of Raglan (Employment)

Professional Representations to Monmouthshire RLDP Draft Deposit Plan & Representations for Land at Shirenewton (HA18)

Date: November 19, 2024
On behalf of: Powells (As site Promoter)



General Comments on the Draft Deposit RLDP

These representations provide a detailed assessment of the Monmouthshire Replacement Local Development Plan (RLDP) draft deposit plan, highlighting both strengths and areas where refinement is recommended to meet the statutory **Tests of Soundness**. By addressing potential weaknesses, the RLDP can be made more robust, ensuring its successful progression through examination and adoption.

Test 1: Does the plan fit?

(Is the RLDP consistent with other plans and strategies?)

Strengths

1. **Alignment with National Policies:**
    - The RLDP demonstrates a strong overall commitment to sustainability, affordable housing, and economic growth, aligning with national priorities outlined in **Future Wales 2040** and **Planning Policy Wales (PPW12)**. Policies promoting net-zero carbon housing and renewable energy reflect Monmouthshire's proactive approach to addressing climate change.
    - The inclusion of green infrastructure and sustainable transport policies supports the broader goals of creating resilient and future-proofed communities.
2. **Regional Collaboration:**
    - The RLDP aligns with the objectives of the **Cardiff Capital Region City Deal**, particularly regarding transport connectivity, employment opportunities, and infrastructure investment. These connections strengthen the RLDP's consistency with regional strategies.
3. **Local Strategies:**
    - The RLDP aligns broadly with the **Well-being of Future Generations Act**, incorporating objectives such as community well-being, placemaking, and environmental stewardship.

Areas for Improvement

1. **Explicit Integration of Specific National Policies:**
    - While the RLDP broadly aligns with national priorities, more explicit references to **Policy 4 (Supporting Rural Communities)** and **Policy 7 (Delivering Affordable Homes)** are needed to demonstrate how housing allocations in rural areas like Shirenewton support these objectives.
    - Greater emphasis on housing delivery in rural settlements is critical to ensuring that the RLDP addresses the unique challenges faced by these communities.
2. **Regional Partnerships and Cross-Boundary Working:**
    - The RLDP mentions regional collaboration but could provide more detail on how partnerships have influenced site allocations and infrastructure planning,

particularly for settlements like Shirenewton. A stronger articulation of cross-boundary housing and employment needs would reinforce its alignment with the Cardiff Capital Region's priorities.

3. **Local Strategic Fit:**
    - While the RLDP aligns with the **Well-being of Future Generations Act**, it should more clearly articulate how specific policies address demographic imbalances, including housing for younger families and sustainable transport options.

Test 2: Is the plan appropriate?

(Is the RLDP supported by robust evidence and does it address key challenges?)

Strengths

1. **Evidence-Based Housing Allocations:**
    - The RLDP acknowledges the affordability challenges in Monmouthshire, where average house prices significantly exceed local incomes. The focus on delivering affordable housing is a key strength, especially in rural settlements like Shirenewton.
2. **Sustainability and Climate Change:**
    - The RLDP includes policies on net-zero carbon homes, renewable energy, and green infrastructure, which align with both local and national sustainability goals. These measures strengthen the plan's long-term environmental resilience.

Areas for Improvement

1. **Demonstrating Housing Need in Rural Settlements:**
    - Housing allocations in rural areas like Shirenewton require robust evidence to justify their inclusion. This should include data on housing need specific to the Community Council area. If such work has been completed, it must be clearly presented to ensure the allocation withstands scrutiny during examination.
2. **Economic Strategy:**
    - While the RLDP identifies economic constraints, such as limited employment land, more detail on how proposed allocations address these challenges would improve the plan's robustness. Demonstrating how housing and employment allocations interact to support local economies is essential.
3. **Specificity on Housing Types:**
    - While the RLDP identifies housing need, it would benefit from more detail on the types of housing to be delivered, including affordable, family-oriented, and downsizer-friendly homes. This specificity would reinforce the appropriateness of allocations like Shirenewton.

Test 3: Will the plan deliver?

(Is the RLDP deliverable and adaptable within the plan period?)

Strengths

1. **Viability Assessments:**
    - Each site has undergone independent viability assessments, ensuring that the proposed allocations are financially feasible. This provides confidence in the deliverability of the plan's housing targets.
2. **Monitoring Frameworks:**
    - The RLDP includes monitoring frameworks to track housing delivery and infrastructure progress. This demonstrates the Council's commitment to adaptability and responsiveness.

Areas for Improvement

1. **Infrastructure Readiness:**
    - The RLDP relies on infrastructure upgrades for certain sites, raising questions about deliverability. For rural settlements, clear timelines and commitments from infrastructure providers are essential to ensure housing targets are met within the plan period.
2. **Contingency Measures:**
    - While the RLDP includes monitoring frameworks, it lacks robust contingency measures to address potential under-delivery of housing or employment land. Introducing alternative strategies, such as reserve sites, would strengthen the plan's adaptability.

Conclusion

The RLDP provides a well-structured framework for sustainable growth in Monmouthshire, addressing key housing, economic, and environmental challenges. However, additional clarity and emphasis are required in areas such as rural housing needs, regional partnerships, and infrastructure planning. By addressing these areas, the Council can ensure the RLDP meets the **Tests of Soundness** and progresses smoothly through examination.

The allocation of land at Shirenewton presents an excellent opportunity to demonstrate the RLDP's commitment to sustainable rural growth, but this must be underpinned by robust of settlement specific housing need on the Council's part to evidence and clearly articulated justifications to ensure its success.

Site Specific Representation: Land at Shirenewton (Site HA18)

Promotion of Land at Shirenewton

The Shirenewton site is proposed for a residential development allocation of 26 dwellings under site reference HA18. The following sections outline the key justifications for its allocation, demonstrating alignment with RLDP objectives and its overall deliverability, sustainability, and suitability for development.

Alignment with RLDP Strategic Objectives

The Shirenewton site supports multiple RLDP objectives:

- **Objective 10 (Housing):**

  The Shirenewton site addresses Monmouthshire's critical housing challenges by providing a balanced mix of affordable and market housing that meets the specific needs of the local community. This is particularly important in rural settlements like Shirenewton, where housing options are often limited, and affordability is a growing concern.

  - Addressing Affordable Housing Needs:

    High Demand for Affordable Housing: Monmouthshire's rural areas face acute affordability issues, with property prices significantly exceeding local average incomes. This creates barriers for younger families, key workers, and first-time buyers seeking to remain in their communities.

    Site Contribution: The Shirenewton development is well-placed to deliver a meaningful proportion of affordable housing, tailored to local needs. By doing so, it directly supports Monmouthshire's strategic housing target and aligns with the RLDP's commitment to increasing the supply of affordable homes in sustainable rural locations.

    Community Integration: Affordable homes on the site will be seamlessly integrated with market housing, creating a cohesive and inclusive development that fosters social cohesion.

  - Addressing Market Housing Needs:

    Balancing Housing Supply: Rural settlements like Shirenewton often lack a sufficient supply of modern, high-quality market housing, leading to an unbalanced housing market. This proposal provides opportunities for a range of housing types, including family homes, starter homes, and downsizer-friendly properties, catering to the full spectrum of housing needs.

    Supporting Local Demographics: By increasing housing supply, the site can help to retain and attract younger residents and families, countering the trend of rural depopulation and addressing Monmouthshire's aging population profile.

- Sustainability and Accessibility:

  Sustainable Location: The site's proximity to local services, including the village school, pub, and park, ensures that future residents will benefit from walkable access to amenities, reducing reliance on private cars and promoting sustainable living.

  Connection to Local Infrastructure: The site is well-connected to existing infrastructure, with utilities, drainage, and transport networks capable of supporting the proposed development.

- **Objective 9 (Demography):**

  The proposed development at Shirenewton addresses one of Monmouthshire's most pressing challenges: its aging population and the resultant demographic imbalance. The inclusion of housing types that are accessible and affordable for younger families, professionals, and first-time buyers directly contributes to rebalancing the local demographic profile and ensuring the long-term sustainability of rural communities.

  - Understanding the Challenge:

    Aging Population: Monmouthshire has a disproportionately high percentage of older residents compared to the national average. This demographic trend creates challenges for local economies, public services, and community vitality.

    Younger Population Decline: Younger families and individuals often struggle to access suitable housing due to high property prices and a limited supply of homes in rural settlements. As a result, they are either forced to move to urban areas or outside the county altogether, exacerbating the aging population trend.

- **How the Development Addresses the Challenge:**

  - Housing for Younger Families and Professionals:

    The proposed development includes a mix of housing types designed to meet the needs of younger families and individuals, including starter homes, affordable housing units, and homes suitable for professionals seeking to settle in the area.

    By creating opportunities for younger residents to live and work locally, the development supports a more age-balanced community.

  - Affordable Housing Opportunities:

    A significant proportion of the development is designated for affordable housing, enabling key workers, first-time buyers, and younger families to access homes within their financial reach.

    Affordable housing will also attract residents who contribute to local services, such as teachers, healthcare workers, and retail staff, ensuring that essential community functions are supported.

- Attracting Economic Contributors:

  Younger residents typically bring increased economic activity, from spending in local shops and businesses to supporting local schools and services. This creates a multiplier effect that benefits the wider community.

  The presence of younger families helps to sustain schools, childcare facilities, and recreational amenities, ensuring these services remain viable for future generations.

- **Community and Social Benefits:**

  Intergenerational Balance: Encouraging younger families to move into Shirenewton fosters intergenerational interaction, which is vital for building cohesive and inclusive communities.

  Strengthening the Local Workforce: Younger residents contribute to a more dynamic workforce, which is essential for the growth and sustainability of local industries and businesses.

  Maintaining Local Facilities: The increase in younger residents will ensure greater use of community facilities such as parks, sports clubs, and village halls, preventing their underutilization and potential closure.

- **Sustainability of the Rural Community:**

  Reversing Depopulation Trends: By offering housing options suitable for younger families and individuals, the development actively counters rural depopulation, helping to sustain Shirenewton as a thriving and vibrant settlement.

  Long-Term Vitality: The development ensures that Shirenewton remains an attractive place to live, fostering a sustainable population that supports local services, facilities, and businesses well into the future.

Objective 11 (Placemaking):

The proposed development at Shirenewton is a strong example of placemaking that aligns with Monmouthshire's vision for sustainable and well-designed growth. It ensures that the new development integrates harmoniously with the existing settlement, preserves the character and identity of the village, and contributes to its vibrancy through thoughtful design, community engagement, and accessibility to local facilities.

Preserving and Enhancing Village Character:

1. **Integration with the Existing Built Environment:**
   - The design of the development reflects the architectural style and scale of the existing village, ensuring a seamless visual and functional connection between the new and old areas.
   - Sensitive layout planning incorporates green buffers and landscaping to soften the transition between the development and the surrounding

countryside, minimising visual impacts and maintaining the rural character of Shirenewton.

2. **Respect for Local Heritage:**
    - The development is designed to complement the historic character of Shirenewton, ensuring that any potential impact on heritage assets is carefully mitigated through design and layout choices.

<u>Supporting Community Vitality:</u>

1. **Access to Local Facilities and Amenities:**
    - The development is within walking or cycling distance of key community facilities, including the local school, village hall, park, and pub. This proximity supports sustainable living by reducing car dependency and encouraging active travel.
    - Enhanced access to these amenities ensures that new residents can integrate into the existing community, strengthening social ties and promoting inclusivity.
2. **Contributing to the Local Economy:**
    - New residents will support local businesses and services, providing a much-needed boost to the village's economic vitality.
    - By increasing the village's population, the development ensures the continued viability of local amenities such as schools, shops, and recreational facilities, which are essential for long-term community sustainability.
3. **Encouraging Social Interaction:**
    - The development includes shared public spaces such as green areas, walking paths, and community-oriented infrastructure. These spaces provide opportunities for interaction between new and existing residents, fostering a sense of community.

Promoting Sustainable Design and Living:

1. **Sustainable Housing:**
    - Homes will be built to modern standards of energy efficiency, contributing to Monmouthshire's net-zero carbon goals.
    - Incorporating renewable energy features, such as solar panels or heat pumps, further enhances the sustainability of the development.

2. **Connectivity and Active Travel:**
    - The development is designed with safe pedestrian and cycle routes connecting residents to key destinations in the village, such as the school and park. This reduces reliance on private vehicles and supports healthy, active lifestyles.
    - Public transport accessibility ensures that residents have sustainable options for commuting and accessing services beyond the village.
3. **Green Infrastructure:**
    - The inclusion of green spaces and biodiversity enhancements, such as tree planting, hedgerow creation, and wildlife corridors, contributes to environmental sustainability and enhances the aesthetic appeal of the development.
    - These features provide recreational opportunities for residents and support mental and physical well-being.

Enhancing Community Resilience:

1. **Adaptability to Future Needs:**
    - The development is designed to be flexible, with housing types and layouts that can adapt to changing community needs over time, such as accommodating aging residents or growing families.
2. **Fostering Local Identity:**
    - By integrating seamlessly with the existing settlement and enhancing the public realm, the development strengthens Shirenewton's identity as a vibrant and thriving rural village.
3. **Providing Long-Term Benefits:**
    - The thoughtful integration of the development ensures that it contributes positively to the village for generations, supporting sustainable growth and a resilient community.

Deliverability and Infrastructure Readiness

- **Transport and Accessibility:**
  A transport assessment demonstrates the site's excellent connectivity to the village centre and local facilities via active travel routes, including pedestrian pathways and cycling options. These provide safe, direct access to key amenities such as the local primary school, village pub, etc, promoting sustainable travel within the community.
- **Infrastructure Availability:**
    - The site is located adjacent to existing utilities, with a mains sewer in close proximity, ensuring that wastewater can be managed efficiently.
    - Surface water drainage is naturally supported by the site's topography, reducing the risk of localized flooding.
    - Existing road access is suitable for residential development, with minor improvements required to enhance entry and exit points.

- **Proximity to Community Facilities:**
  Residents will benefit from access to the local park and village hall, both within walking distance. These facilities enhance the quality of life for future residents and encourage community integration.

Sustainability Appraisal

- **Environmental Considerations:**
  - A landscape assessment concludes that, with appropriate design and planting measures, the development will have a limited long-term impact on the surrounding landscape. The proposal incorporates green buffers and tree planting to mitigate any visual impact.
  - Ecologically, the site is not sensitive. The land is currently in arable use and has low biodiversity value. Development can include biodiversity enhancements, such as the introduction of native hedgerows, to achieve a net biodiversity gain.
- **Social Benefits:**
  - The provision of affordable housing within the development supports local families and improves the affordability of housing in the area.
  - The site's integration with existing community facilities, such as the local school and park, encourages active community participation and enhances social cohesion.
- **Economic Impact:**
  - Short-term economic benefits include job creation during the construction phase.
  - Long-term benefits include increased patronage of local businesses, such as the village pub and shops, contributing to the village's economic sustainability.

END

1461

MCC Estates

Planning & Development Consultants
Ymghynghorwyr Cynllunio a Datblygu

asbriplanning

Date: 16th December 2024
Our Ref: 21.205

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

[redacted]

Monmouthshire County Council
Planning Policy
County Hall
The Rhadyr
Usk
NP15 1GA

[redacted]

Dear [redacted]

Monmouthshire Replacement Local Development Plan 2018-2033
Deposit Plan Consultation - Representation on behalf of MCC Estates
Site HA2 Land to the East of Caldicot/North of Portskewett

We write in relation to the current consultation on the Monmouthshire Replacement Local Development Plan (RLDP) Deposit Plan, on behalf of our Client (Monmouthshire County Council – Estates), specifically with regard Site HA2 'Land to the East of Caldicot/North of Portskewett'.

As the Authority are aware, a significant amount of supporting information has been prepared in relation to the above site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'Land to East of Caldicot/North of Portskewett' as a strategic housing allocation with the Replacement Plan fully accords with the RLDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

In summary, these representations wish to fully support the Deposit Plan, including the allocation of 'Land to the East of Caldicot/North of Portskewett' for a residential-led mixed-use development as designated under Policy HA2. It is reiterated that our Client (MCC Estates) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

Although the representations provide support for the Deposit Plan as a whole, some detailed matters are raised / objected to in relation to specific elements of the proposed policy wording and supporting Indicative Masterplan relating to Site HA2.

Strategic Policy S1 – Growth Strategy
It is acknowledged that the level of growth proposed within the Deposit Plan (i.e. provision for 6,210 homes to meet a housing requirement of 5,400 homes) is in general conformity with Future Wales's overall strategy, and that as Monmouthshire is not located within a 'National Growth Area' as identified

in Future Wales, it is difficult to justify higher growth levels without potentially compromising Welsh Government objectives for the wider South East Wales region. Notwithstanding the Welsh Government's position, we would comment that it is disappointing that the higher levels of growth found to be appropriate at earlier stages of the RLDP preparation process, are not able to be progressed, but appreciate the requirement to accord with national growth objectives.

Strategic Policy SP2 - Spatial Distribution of Development

We wish to support the Deposit Plan's overarching strategy in relation to the spatial distribution of development across Monmouthshire over the plan period. It is considered that the settlement hierarchy identified in Strategic Policy S2, which seeks to focus new development in the primary settlements of Abergavenny, Chepstow, Monmouth, and Caldicot (with a lower level of growth in sustainable lower tier settlements), is entirely appropriate and will allow for the delivery of sustainable and resilient communities.

Policy HA2 (Land to the East of Caldicot/North of Portskewett)

Overall Support for Allocation

It is acknowledged within the Deposit Plan that in light of the County's widespread landscape and agricultural land quality, it is necessary to identify allocations that are the best connected, most sustainable, best able to deliver placemaking and are least harmful (which has required balanced planning considerations with a preference for promoting the most sustainable sites). The detailed supporting information prepared in relation to the Land to the East of Caldicot site to date, including the significant masterplanning work which has been undertaken in liaison with both the Design Commission for Wales and the Local Authority and their statutory consultees, has demonstrated that a sustainable, high-quality residential-led mixed use scheme which responds sensitively to both local character and landscape setting can be delivered on the site. It is therefore considered that the allocation of 'Land East of Caldicot/North of Portskewett' (Site HA2) represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The inclusion of Site HA2 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

In addition, the identified delivery timescales and quantum of units for the site are agreed with and considered to be entirely suitable and appropriate. As stated, our client is committed to the delivery of the allocation, in accordance with the phasing trajectory outlined at Appendix 9 of the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales.

With regards to the representations submitted to date, it has been demonstrated that the site is inherently suitable for residential development, as acknowledged by virtue of the site's inclusion as a housing-led mixed-use allocation within the Deposit Plan. However, to provide further assurance in regards to site deliverability, it is the case that our Client is looking to commence preparation of a Planning Application for the scheme accordingly, so as to ensure that site can be brought forward for development in line with the timescales set out for the allocation. A formal planning application will be submitted to Monmouthshire County Council to secure permission for the site and enable its development at the earliest opportunity. Further discussions are being held with the Local Authority in this regard.

Policy HA2 & Policy EA1m - Detailed Wording - Objections

As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of the Land East of Caldicot site as an allocation, some detailed matters are objected to in relation to specific elements of the proposed policy wording (and supporting Indicative Masterplan relating to Site HA2).

It is the case that part of Site HA2 is earmarked for employment use i.e. the allocation includes a minimum of 1ha B1 Use Class employment land. An indicative location for the 1 hectare of employment land is shown on the Indicative Masterplan included in the Deposit Plan at page 119. The positioning of the employment land as identified on the Indicative Masterplan is not considered to present the most appropriate location for such use from a visual impact, density, and placemaking perspective. The positioning of the employment land (although acknowledged as indicative only at this stage) is therefore objected to. The fundamental requirement for the provision of employment land within Site HA2 is acknowledged, however the detail will need to be refined through the masterplanning process. It is requested that the wording of Policy EA1m and Policy HA2 is amended to refer to 'approximately' 1 hectare of employment land, rather than a 'minimum' of 1 hectare (and its exact positioning on Site HA2 is to discussed further as part of the ongoing masterplanning exercise in liaison with the Council).

With regard to the masterplan, although it is acknowledged that the version included within the Deposit Plan is referred to as 'Indicative', it is the case that further/ongoing discussions are underway between the Council and the design team, and our Client looks forward to progressing these discussions over coming weeks. The policy wording does make reference to this process ("A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application") – however, it is requested that the status of the masterplan as included within the RLDP is clarified with further text to confirm that the status of the 'Indicative Masterplan' as included at Page 119 will be superseded further to the masterplanning process.

A number of detailed elements regarding the policy wording of Policy HA2 are raised below, and it is requested that the amendments highlighted in red are incorporated into the wording contained within the adopted Plan.

> *Policy HA2 (Land to the East of Caldicot/North of Portskewett)*
> *In addition to the Placemaking Principles identified in Policy S8, the site must comply with the following criteria below:*
>
> *Sustainable Communities*
>
> *a) Provision of a mixed-use development containing the following key uses:*
> - *Approximately 770 homes including 50% affordable homes.*
> - *Primary School.*
> - *Strategic public open space, including community playing fields, allotments, community orchard and green infrastructure provision.*
> - *A neighbourhood centre including appropriate community facilities, the uses and scale of which to be agreed by MCC.*
> - ~~*A minimum of*~~ *Approximately 1ha B1 Use Class employment land.*
>
> *b) Crick Road must be incorporated into the site as an active street frontage where appropriate providing cohesion and a gateway for the development as a whole.*

c) *The design and masterplanning of the site should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.*

d) *The completion of non-residential elements must be delivered in line with an agreed phasing programme*

Sustainable Travel and Highways

o) *Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:*

- *An agreement must be entered into with the Council to facilitate the construction of multiple development accesses along Crick Road and any necessary access points along the B4245 to the north of the site;*
- *A minimum of a 2-metre footway for pedestrians over the site's frontages linking to existing footways;*
- ~~*Revision of speed limits along Crick Road to 20mph, the location of which to be agreed with MCC*~~.
- *Provision of a public transport link to be provided along Crick Road and consideration to be given to provision throughout the site, details of which to be agreed with MCC, including any necessary financial contributions to improve nearby infrastructure where identified as appropriate.*

Flood Risk and Sustainable Drainage Systems

p) *No built development will be permitted (other than works associated with sustainable drainage) within the part of the site located in floodplain.*

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application (which will supersede the status of the Indicative Masterplan).

Conclusion

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to the site, the inclusion of 'Land to the East of Caldicot/North of Portskewett' (Site HA2) as a strategic housing allocation with the Replacement Plan fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness.

Further to ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering the allocation which has been evidenced as being entirely deliverable and viable

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions in relation to Policy EA1m and Policy HA2 specifically. Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Yours faithfully,

[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Monmouthshire County Council (MCC)- Estates	Asbri Planning
Address:		[redacted]

Telephone No:		[redacted]
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
	Support:	x

Is your representation in support or objection?	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full details.

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full details.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full detail of representation (which both supports and objects to Policy HA2).

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	X
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full detail of representation (which both supports and objects to Policy HA2).

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	X
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full detail of representation (which both supports and objects to Policy EA1m).

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

N/A

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to enclosed Cover Letter for full details of representation to Deposit Plan on behalf of MCC Estates.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	X
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate ☐	Fails Test 3: Will the Plan deliver ☐	

(is the Plan appropriate for the area in light of the evidence)?	(is it likely to be effective)?

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

N/A

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1467

Hallam Land Ltd (Boyer Planning)

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Hallam Land (HL)	[redacted]
Address:	C/O Agent	
Telephone No:		
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

This representation will relate and support Policy HA6 - Land at Rockfield Road, Monmouth.

Hallam Land (HL) agree that key issues and drivers, vision and objective identified in the Replacement LDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the plan period as set out within legislation and national policy and guidance, whilst also clearly identifying the relevant evidence base used to formulate the emerging plan and how this has evolved since the Preferred Strategy (PS).

HL support the recognition that Monmouthshire demonstrates capacity for sustainable growth based on accessibility, availability of amenities and employment provision in the context of its existing population bases which is reflected within the Integrated Sustainability Appraisal and supporting technical evidence base. We also support the recognition of Monmouthshire as a hub for development, in particular for housing in accordance with the findings of the Local Housing Market Assessment Refresh.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

In principle HL supports MCC's growth aspirations as set out within Strategic Policy S1 (Growth Strategy). This policy states that in order to achieve Monmouthshire's goal of building sustainable communities a total of 6,210 homes will be required over the plan period between 2018-2033 to meet a housing requirement of 5,400 homes.

Land at Rockfield Road, Monmouth is identified as a proposed site allocation (Policy HA6) and therefore plays a crucial role in helping MCC deliver the requisite level of housing over the proposed plan period. HL are wholly supportive of the site's status and remain committed to bringing forward the proposed 60 no. homes in a timely manner to meet the needs of the local community, alongside the extant outline planning permission for 70 homes (DC/2017/0053D) and current Reserved Matters (DM/2020/00189) immediately adjoining.

Upon further review HL note the 6,210 homes identified within Strategic Policy S1 incorporates a 15% flexible allowance. HL appreciates Monmouthshire is not technically recognised within a National Growth Area as defined by Future Wales 2040, however given its strategic location in South East Wales and the fact it forms part of the Cardiff Capital Region, the area unquestionably warrants a suitable level of growth over the next 9 years up to 2033.

In light of the above its important to recognise the fact the proposed 15% threshold exceeds the Welsh Government's expectations as set down within the Development Plan Manual (DPM) (Edition 3 - March 2020). On that basis HL believe the projected level of growth identified by Strategic Policy SP1, as a minimum, is reflective of MCC's ambitions as an authority whilst remaining proportionate to the wider regional agenda. HL therefore supports the RLDP Growth Strategy in which Land at Rockfield Road, Monmouth is a key component to help MCC reach its growth aspirations over the plan period.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 seeks to focus new development on the primary settlements of Abergavenny (including Llanfoist), Monmouth, Chepstow and Caldicot including the Severnside area. The Sustainable Settlement Appraisal (December 2022), which forms the RLDP evidence base, highlights the prominent role the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth and describes "*the relative self-containment of these settlements compared to other settlements within the County justifies their classification as Primary Settlements which can be maintained and strengthened through future sustainable development.*"

HL support the recognition of Monmouth as a Primary Settlement and agree that it is an appropriate location for future growth and development. HL support that following the Preferred Strategy the Deposit Plan now seeks to provide a distribution of 15% (923 dwellings) of residential growth within Monmouth, up from the previous 0% distribution.

This approach clearly aligns with the objectives of national planning policy and shall ensure future housing in prioritised in locations which benefit from good connectivity to local services, facilities and transport infrastructure.

As detailed in MCC's Sustainable Settlement Appraisal, Monmouth and by virtue of which Rockfield Road accords with the principles above and seeks to address existing challenges identified within the RLDP. Most notably that includes facilitating the delivery of full market and affordable housing in areas of greatest need to respond to demand and assist in rebalancing local demographic trends to create more sustainable communities.

HL endorses the proposed strategy to direct growth to Monmouth as a Primary Settlement and supports the identification of key site allocations within this locality, such as Land at Rockfield Road, which are able to be relied upon to contribute to meeting MCC's housing needs.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).* *If you are objecting, please state how you would like the Plan to be changed.*		

Whilst HL have no specific comments in relation to the requirements of Policy OC1- New built development in the Open Countryside, there is support in regard to the Settlement Boundary Review which facilitates the above policy.

The Settlement Boundary Review Paper (October 2024) which accompanies the RLDP provides the background and justification for alterations to existing settlement boundaries within the Deposit Plan. Given its position as a Primary Settlement, HL supports the amendments being sought in respect of the existing settlement boundary associated with Monmouth. Most notably that includes reference 20 which intends to amend the boundary in the north-eastern corner of the town to facilitate the delivery of Residential Allocation HA6 – Land at Rockfield Road.

As identified it is proposed to adjust the '*boundary to include Residential Allocation HA4. Amend Settlement Boundary to include the site with planning permission as logical rounding off of settlement. Additional Small/Round off sites. Area to north is well defined by existing hedgerow*'.

HL consider that the change, to facilitate both the allocation and the extant consent, represents a logical extension to the defined urban area of Monmouth and will enable residential development to come forward in an area of greatest need.

Boyer are aware of HL's comments in relation to Policy GW1 – Green Wedge Designations as submitted in separate representations. Boyer provide no further comments for HL over those already provided.

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

HL broadly agree with the wording and rationale of Strategic Policy S3 (Sustainable Placemaking & High Quality Design) and Policy PM1 (Creating Well-Designed Places). Upon further review we understand the overarching principles of which are reiterated within Strategic Policy S8 (Site Allocation Placemaking Principles) along with the proposed site allocation for Land at Rockfield Road (Policy HA6) itself, which HL are confident in delivering in line with MCC's expectations.

The Proposed Masterplan demonstrates that spatially the site is more than capable of accommodating the proposed allocation of 60no. homes, whilst being read as a comprehensive development alongside Reserved Matters (DM/2020/00189) immediately

adjoining. The site will facilitate provision for public open space, green infrastructure, pedestrians footpaths and cycleways, SuDS/attenuation basins. Collectively these features are illustrated within the information provided as part of HL's latest candidate site submission which have been deemed acceptable by the authority.

- HL have no comments on Policy PM2– Environmental Amenity
- HL have no comments on Policy PM3 – Advertisements
- HL have no comments on Policy HE1 – Conservation Areas
- HL have no comments on Policy HE2 – Design of Shop Fronts in Conservation Areas
- HL have no comments on Policy HE3 – Roman Town of Caerwent

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	Support/Comment
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S4 – Climate Change, sets out a range of measures and criteria for developments to address the cause of and adapt to the impacts of climate change. In principle, HL is eager to help contribute towards MCC's Climate and Decarbonisation Strategy and Action Plan, which sets out broad objectives and actions to deliver a net reduction in carbon emissions to net zero by 2030 and address the water issues in the County.

The level of HL's sustainability is demonstrated through the use of sustainable modes of transport, sustainability within the design of buildings, or indeed the actual proportions of Green & Blue Infrastructure. This is demonstrated in the indicative candidate site submissions.

In terms of specifics within Strategic Policy S4, HL support the prioritisation of fabric first as per criteria (ii), and also notes that criteria (iv) requests developments to utilise sustainable construction techniques and local supplies through the adoption of the circular economy principles where possible.

HL fully supports emerging policies seeking to tackle climate change with proactive sustainable measures. However, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The proposed policy, however, should be flexible to allow developers to utilise the most appropriate technology available at

that time, whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.

Whilst HL recognise the proposed ambition of Policy NZ1, it is noted that Future Housing Standards (FHS) is due to be implemented in 2025 aiming to eliminate dwellings' reliance on fossil fuels, instead using low carbon energy sources, such as heat pumps and other renewables. HL will clearly comply with these regulations and national requirements, and question the need to currently step beyond the FHS.

Furthermore, HL highlight how applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of Planning Policy Wales, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. HL consider that the scope of Policy NZ1 needs to be both amended to align it with national guidance, whilst also reflecting FHS.

- HL have no comments on Policy CC2 – Renewable Energy Allocation
- HL have no comments on Policy CC3 – Renewable Energy Generation

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S5 - Green Infrastructure, Landscape and Nature Recovery, requires development proposals to adopt a strategic and proactive placemaking via maintaining, protecting and enhancing the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, access and heritage assets.

As demonstrated within the information submitted as part of the Candidate Site process the proposed scheme has been informed by the site's setting and looks to actively respond to the area's natural characteristics. Most notably this includes the fact that green infrastructure has generally been prioritised in the site thereby representing a logical extension to the

existing urban area of Monmouth, in conjunction with outline planning permission for 70 homes (DC/2017/0053D) and current Reserved Matters (DM/2020/00189).

Again, HL agree in principle with Policy GI1 – Green Infrastructure and in particular that a GI Statement will be proportionate to the scale, nature and complexity of the development proposed. HL do question if the policy is required altogether as it a repetition of national planning policy – Planning Policy Wales (12th Ed 2024).

Boyer are aware of HL's comments in relation to Policy LC3 – Bannau Brycheiniog National Park as submitted in separate representations. Boyer provide no further comments for HL over those already provided.

- HL have no comments on Policy GI2 – Trees, Woodland and Hedgerows
- HL have no comments on Policy LC1 – Landscape Character
- HL have no comments on Policy LC2 – Blaenavon Industrial Landscape World Heritage Site
- HL have no comments on Policy LC4 - Wye Valley National Landscape (AONB)
- HL have no comments on Policy LC5 – Dark Skies and Lighting
- HL have no comments on Policy NR1 – Nature Recovery and Geodiversity
- HL have no comments on Policy NR2 – Severn Estuary Recreational Pressure
- HL have no comments on Policy NR3 – Protection of Water Sources and the Water Environment
- HL have no comments on Policy PROW1 – Public Rights of Way

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Comment
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S6 states where existing infrastructure is inadequate to serve the proposed development, new or improved infrastructure and facilities must be provided as part of the proposed development to mitigate any likely adverse impacts. HL query whether this is required as a separate policy given the need for physical, community and green/blue

infrastructure will be assessed on individual site-by-site basis and secured via legal agreements in the form of a Section 106 within the planning application process.

Furthermore, where specific infrastructure works are necessary to facilitate the delivery of allocated sites such as HA6- Land at Rockfield Road, these details are specified within the policies which correspond with those individual sites.

- HL have no comments on Policy IN1– Telecommunication, broadband and other digital infrastructure

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	Support/Comments
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S7 (Affordable Housing) establishes MCC's target for affordable housing over the emerging plan period (2018-2033) as 1,595 – 2,000 homes. This will be achieved in a range of ways including a requirement for all new site allocations to deliver 50% affordable housing on-site which is similarly referenced within the wording for proposed site allocation ref. HA6 – Land at Rockfield Road.

In response to above, HL acknowledge the County's need to accelerate the delivery of affordable housing in response to local need and are committed to working collaboratively with the Council to help meet their affordable housing requirements.

However, in unique situations such as Policy HA6 – Land at Rockfield Road, where the proposed allocation forms, in effect, a 2nd phase to an outline planning permission for 70 homes (DC/2017/0053D) and current Reserved Matters (DM/2020/00189), then it would be appropriate to have regard to what is to be delivered. HL would suggest that this is approached specifically in relation to Policy S8 and HA6, but is an important point to make.

HL support the identification of Monmouth as a Primary Settlement within Policy H1 – Residential Development in Primary and Secondary Settlements. HL agree that Monmouth accords with National policy contained in PPW12 provides a firm steer that new development should be directed to existing urban areas where there is greatest potential for reducing the need to travel due to the co-location of houses, jobs, shops, services and public transport facilities MCC support in principle the affordable housing provision.

HL agree with the requirement of Policy H8 – Housing Mix that developments should provide a range and mix of house types, tenure and size. However, concern is raised in relation to the supporting text at 12.10.5 which suggests that the Authority are engineering the housing mix, rather than allowing the market/developers knowledge to have influence. In particular concern is raised as *'Priority will be given to the provision of small to medium size homes of 3 bedrooms or fewer. Proposals that predominately consist of large detached market properties of 4 bedrooms or more will not be supported'*.

HL also raise concerns in regard to having to the timing of agreement of a supporting statement providing the proposed housing mix, as this will have site viability impacts.

Moreover, as with Policy S7 above, HL's allocated site at HA6 is effectively a 2nd phase development and due consideration is needed to the house mix brought forward in phase 1. HL agree that this a unique situations, however there has to be some flexibility in this instance.

- HL have no comments on Policy H1 – Residential Development in Primary and Secondary Settlements
- HL have no comments on Policy H3 – Residential Development in Minor Rural Settlements
- HL have no comments on Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use
- HL have no comments on Policy H5 – Replacement Dwellings in the Open Countryside
- HL have no comments on Policy H6 – Extension of Rural Dwellings
- HL have no comments on Policy H7 – Specialist Housing
- HL have no comments on Policy H9– Affordable Housing Exception Sites
- HL have no comments on Strategic Policy S9 – Gypsy and Travellers
- HL have no comments on Policy GT1 – Gypsy, Traveller and Showpeople Sites

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

HL fully supports the principle of Policy HA6 – Land at Rockfield Road. As mentioned above the site plays a pivotal role in helping to deliver MCC's Spatial & Growth Strategies which intend to prioritise future development in the most sustainable locations throughout the region. Furthermore, given its position the allocation represents a logical extension to the defined urban area of Monmouth, which as a primary settlement is expected to accommodate approximately 15% of Monmouthshire's housing provision over the plan period. HL commends the approach MCC have adopted in terms of aligning future growth with existing infrastructure which verifies the fact the emerging RLDP accords with the objectives of Future Wales 2040 and PPW12.

Whilst HL wholly support the principle of allocation Policy HA6, some comments are provided in terms of the specific wording of the policy.

In particular at supporting paragraph 14.8.1 states that '*The northern boundary of the site comprises of a mature hedgerow with fields beyond. Retention of a green buffer on the edge of the site is required to minimise any potential landscape impact on the wider surroundings'*. HL consider that there is some ambiguity in the extent of the buffer, and also landscape is part of the sider development considerations and needs to be provided in the context of delivering 60 new dwellings. In no way are HLP suggesting that there would no green infrastructure, rather it needs to be seen in the context of the adjoining development site.

In the policy, HL have a minor suggestion that Criteria e relating to financial contributions would be a repetition of Policy S6, but also would be something that would need to be considered in more detail and is probably covered by criteria d regarding access to the development and off-site highway improvements.

As noted, HL consider these minor points but worth mentioning. In no way does this dimmish the support HL have for Policy HA6.

As for Policy S8, HL support the policy in principle, though again highlight some further suggestions. The suggestions relate back to Question 9 and the provision of affordable housing, as well as the housing mix. Again HL outline that Policy HA6 is unique in its proposal

as a phase 2 development and that due consideration is required between the 1st and 2nd phase for affordable mix as well as housing mix.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- HL have no comments on Strategic Policy S10 – Employment Sites Provision
- HL have no comments on Policy E1 – Protection of Existing Employment Land
- HL have no comments on Policy E2 – Non-Allocated Employment Sites
- HL have no comments on Strategic Policy S11 – Rural Economy
- HL have no comments on Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions
- HL have no comments on Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use
- HL have no comments on Policy RE3 – Agricultural Diversification
- HL have no comments on Policy RE4 – New Agricultural and Forestry Buildings
- HL have no comments on Policy RE5 – Intensive Livestock / Free Range Poultry Units
- HL have no comments on Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. • HL have no comments on Policy EA1 – Employment Allocations • HL have no comments on Policy EA2 – Protected Employment Sites		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. • HL have no comments on Strategic Policy S12 – Visitor Economy • HL have no comments on Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside • HL have no comments on Policy T2 – Protection of existing tourism facilities		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

HL supports the objectives associated with Strategic Policy 13 (Sustainable Transport) which sets a requirement for all development proposals to accord with the Sustainable Transport Hierarchy set out within PPW12 and Llwybr Newydd: Wales' Transport Strategy 2021. The basis of which has been informed by national planning guidance and looks to place greater emphasis on development being located and designed in a way which reduces the need for people to travel and the existing reliance on private vehicles.

HML do however suggest at criteria c) that 'where possible' is added to the requirement – '*Ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure, where possible'.*

- HL have no comments on Policy ST1- Sustainable Transport Proposals
- HL have no comments on Policy ST2 – Highway Hierarchy
- HL have no comments on Policy- ST3 Freight
- HL have no comments on Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas
- HL have no comments on Policy ST5- Transport Schemes
- HL have no comments on Policy ST6 – Protection of Redundant Routes

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. • HL have no comments on Strategic Policy S14- Town, Local and Neighbourhood Centres • HL have no comments on Policy RC1 – Central Shopping and Commercial Areas • HL have no comments on Policy RC2 – Primary Shopping Frontages • HL have no comments on Policy RC3 – Local Centres and Neighbourhood Centres/Shops HL have no comments on Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). *If you are objecting, please state how you would like the Plan to be changed.* • HL have no comments on Strategic Policy S15 – Community and Recreation Facilities • HL have no comments on Policy CI1 – Retention of Existing Community Facilities • HL have no comments on Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas		

- HL have no comments on Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing
- HL have no comments on Policy CI4 – Areas of Amenity Importance

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- HL have no comments on Strategic Policy S16 – Sustainable Minerals Management to Safeguarding
- HL have no comments on Policy M1 – Local Building and Walling Stone.
- HL have no comments on Policy M3 – Mineral Site Buffer Zones
- HL have no comments on Strategic Policy S17 – Sustainable Waste Management
- HL have no comments on Policy W1 – Waste Management Facilities
- HL have no comments on Policy W2 – Agricultural Land – Disposal of Inert Waste
- HL have no comments on Policy W3 – Identified Potential Waste Management Sites

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

HL are wholly supportive of Land at Rockfield Road's progression as a proposed allocation within the Deposit Plan. The site (Ref. HA6) has a pivotal role in helping to deliver MCC's Growth Strategy which seeks to prioritise future development in the most sustainable locations throughout Monmouthshire.

Given its geographic position the site represents a logical extension to the defined urban area of Monmouth (and outline planning permission for 70 homes (DC/2017/0053D) and current Reserved Matters (DM/2020/00189), which in turn is recognised as a primary settlement and is well served by existing supporting infrastructure. These principles fully accord Future Wales 2040, PPW12 and the Development Plans Manuel which further reinforces the acceptability of future development in terms of promoting a more sustainable pattern of development over the proposed plan period.

As demonstrated by the technical information provided to date, Land at Rockfield Road remains a suitable, deliverable and viable allocation for residential development to facilitate the delivery of much needed affordable and full market housing. HL are committed to ensuring the site is brought forward in line with the current housing trajectory in order to continue forward meeting MCC housing requirement.

In light of the above HL supports the proposed Deposit Plan in which Land at Rockfield Road is a key component to help MCC reach its growth aspirations and demonstrate the emerging plan has been soundly prepared against all three tests of soundness defined by national policy.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	Yes
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? • HL have no comments Part 5
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? • HL have no comments Part 5

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1480

Edenstone Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Edenstone Homes	Boyer Planning
Address:		[redacted]
Telephone No:		

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Edenstone Homes support MCC's aspirations to promote demographically balanced, sustainable and resilient communities across Monmouthshire. To achieve this vision a key objective shall be prioritising growth in sustainable locations which are inherently well connected to local services and employment opportunities. Given the sites location within the primary settlement of Abergavenny, Land at Penlanlas Farm fully aligns which such principles and will facilitate the delivery of much needed affordable and market housing in an area of greatest demand.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle Edenstone Homes supports MCC's growth aspirations as set out within Strategic Policy S1 (Growth Strategy). This policy states that in order to achieve Monmouthshire's goal

of building sustainable communities a total of 6,210 homes will be required over the plan period between 2018-2033 to meet a housing requirement of 5,400 homes.

Land at Penlanlas Farm is identified as a proposed site allocation and therefore plays a crucial role in helping MCC deliver the requisite level of housing over the proposed plan period. As the proposed developer Edenstone Homes are wholly supportive of the site's status and remain committed to bringing forward the proposed 100no. homes in a timely manner to meet the needs of the local community.

Furthermore, as the site is inherently well served by existing infrastructure it inevitably provides an opportunity to facilitate the delivery of much needed affordable and full market housing early on during the plan period. In doing so this will ensure MCC are able to achieve a consistent supply of homes over the emerging plan period which accords with PPW12. These principles are underpinned by evidence in the form of the accompanying housing trajectory which further reinforces the fact that the continued inclusion of Land at Penlanlas Farm will enable MCC to demonstrate the RLDP is deliverable and has been soundly prepared.

Upon further review we note the 6,210 homes identified within Strategic Policy S1 incorporates a 15% flexible allowance. Whilst Edenstone appreciates Monmouthshire is not technically recognised within a National Growrth Area as defined by Future Wales 2040. Given its strategic location in South East Wales and the fact it forms part of the Cardiff Capital Region, the area unquestionably warrants a suitable level of growth over the next 9 years up to 2033.

Although Edenstone support, in principle, the increase from the 2023 Preferred Growth Strategy (5,940 homes which included a 10% flexibility allowance to meet a housing requirement of 5,400 homes). It is important to recognise the fact this figure is a considerable reduction from the previous 2021 Preferred Strategy amount of 8,366 homes for the plan period 2018-2033, of which 3,658 homes were proposed to be allocated through new sites.

In terms of the latter Policy S1 now proposes for 1,320 – 2,130 new homes to come forward as allocated sites. Whilst Penlanlas Farm remains central to the delivery of such figures, overall this level of provision represents a notable decrease the that previously identified by the 2021 Preferred Strategy. Whilst we understand this has been partially offset by MCC's landbank figure of 4,080 homes. According to the Council's evidence base this means that approximately 65.8% of MCC's housing requirement over the plan period is set to be accounted for by existing commitments.

Although we appreciate this position is partly a result of delays experienced over the plan-making process caused by Covid-19, phosphates, as well as the intervention from Welsh Government. In order to provide greater flexibility over the proposed plan period and in the interest of maximising opportunities to attract inward investment it is equally as important to ensure the emerging RLDP is forward facing.

In light of the above, Edenstone believe there is sufficient evidence to warrant achieving a 20% flexible allowance and in doing so rolling forward the emerging plan period from 2018-2033 to 2021-2036. These amendments would better reflect Monmouthshire's position within the Cardiff Capital Region and ensure the emerging RLDP incorporates a level of growth capable of meeting local housing need. In turn this bolster MCC's ability to demonstrate the RLDP has been soundly prepared whilst ensuring the proposed housing trajectory is sufficiently adaptable to account for any unforeseen changes over the plan period in the interests of deliverability.

On that basis we believe the projected level of growth identified by Strategic Policy SP1 should be considered a minimum starting point and there are sufficient grounds to warrant increasing the proposed flexible allowance from 15% to 20%. This approach would align with MCC's ambitions as an authority whilst remaining proportionate to the wider regional agenda. Edenstone Homes therefore supports, in principle, the RLDP Growth Strategy in which Land at Penlanlas Farm is a key component to help MCC reach its growth aspirations over the plan period.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 seeks to focus new development on the primary settlements of Abergavenny (including Llanfoist), Monmouth, Chepstow and Caldicot including the Severnside area. The Sustainable Settlement Appraisal (December 2022), which forms the RLDP evidence base, highlights the prominent role the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth and describes "*the relative self-containment of these settlements compared to other settlements within the County justifies their classification as Primary Settlements which can be maintained and strengthened through future sustainable development*."

Edenstone Homes support the recognition of Abergavenny as a Primary Settlement and agrees that given the existing level of infrastructure in place it represents one of the most sustainable locations for future development in Monmouthshire. This is reflected in the fact

of MCC's overall housing requirement around 1,362 homes shall be accommodated within Abergavenny which is equivalent to 22% of the distributed residential growth for the RLDP.

As a proposed site allocation Land at Penlanlas Farm is central to delivering MCC Spatial Strategy and in doing so will promote a more sustainable pattern of development. This approach clearly aligns with the objectives of national planning policy and shall ensure future housing in prioritised in locations which benefit from good connectivity to local services, facilities and transport infrastructure.

As detailed in MCC's Sustainable Settlement Appraisal, Abergavenny and by virtue of which Penlanlas Farm accords with the principles above and seeks to address existing challenges identified within the RLDP. Most notably that includes facilitating the delivery of full market and affordable housing in areas of greatest need to respond to demand and assist in rebalancing local demographic trends to create more sustainable communities.

Edenstone Homes endorses the proposed strategy to direct growth to Abergavenny as a Primary Settlement and supports the identification of key site allocations within this locality, such as Land at Penlanlas Farm, which are able to be relied upon to contribute to meeting MCC's housing needs.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

The Settlement Boundary Review Paper (October 2024) which accompanies the RLDP provides the background and justification for alterations to existing settlement boundaries within the Deposit Plan. Given its position as a Primary Settlement, Edenstone Homes supports the amendments being sought in respect of the existing settlement boundary associated with Abergavenny. Most notably that includes reference 147 which intends to amend the boundary in the north-western corner of the town to facilitate the delivery of Residential Allocation HA5 – Land at Penlanlas Farm.

As the developer Edenstone Homes remain fully committed to development opportunities associated with Land at Penlanlas Farm. The site represents a logical extension to the defined urban area of Abergavenny and will enable residential development to come forward in an area of greatest need. From a procedural perspective the site also aligns with MCC's Growrth Strategy and Spatial Strategy which collectively go to the heart of the RLDP in terms of promoting a sustainable pattern of development.

In addition to the above the site's location on the edge of Abergavenny means it is well served by existing infrastructure and naturally screened by vegetation, particularly along the eastern and northern boundaries. The latter will be further enhanced through a comprehensive planting scheme which provides an opportunity to create a new defensible boundary further north in order to prevent more sensitive areas from encroachment as a result of speculative applications for piecemeal development. The continued inclusion of Land at Penlanlas Farm within the RLPD is therefore crucial in assisting MCC strategically manage the urban form of Abergavenny whilst ensuring development respond to the needs of the community in line with PPW12.

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Edenstone Homes broadly agree with the wording and rationale of Strategic Policy S3 (Sustainable Placemaking & High Quality Design) and Policy PM1 (Creating Well-Designed Places). Upon further review we understand the overarching principles of which are reiterated within Strategic Policy S8 (Site Allocation Placemaking Principles) along with the proposed site allocation for Land at Penlanlas Farm (Policy HA5) itself, which Edenstone are confident in delivering in line with MCC's expectations.

The Proposed Masterplan demonstrates that spatially the site is more than capable of accommodating the proposed allocation of 100no. homes. Whilst providing ample provision for public open space, green infrastructure, pedestrians footpaths and cycleways, SuDS/attenuation basins. Collectively these features are illustrated within the information

provided as part of Edenstone Homes' latest candidate site submission which have been deemed acceptable by the authority.

Land at Penlanlas Farm therefore meets each of the criteria as contained in the emerging policies specified above, and will ensure high-quality placemaking is incorporated at the heart of the scheme which accords with Future Wales, PPW12 and MCC's aspirations.

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S4 (Climate Change) sets out a range of measures for developments to address the cause of, and adapt to the impacts of climate change. In principle, Edenstone Homes supports this directive and intends to bring forward development associated with Land at Penlanlas Farm in a manner which contribute towards MCC's Climate and Decarbonisation Strategy and Action Plan. These reports sets out broad objectives and actions to deliver a net reduction in carbon emissions to net zero by 2030 and address the water issues in the County.

As a company, Edenstone are committed to ensuring sustainability is recognised as a key themes through each and every scheme delivered. This is exhibited through the use of sustainable materials within the design of buildings, prioritising active modes of transport within the proposed layout and indeed the actual proportions of Green & Blue Infrastructure.

Key factors such as biodiversity, carbon reduction, energy generation, and sustainability, are important and influential considerations to Edenstone, who are recognised as an award winning house builder and members of the Green Dragon Environmental Standards Group which certifies their environmental practices and the businesses' compliance with legislation in respect of environmental protection.
Edenstone Homes do not dispute the Council's climate change emergency declaration and agree that there is a need for new development to contribute to significant reductions in CO2 emissions. However careful consideration is needed in regard to viability to ensure the

proposed site allocations such as Penlanlas Farm remain deliverable in order to help MCC meet its housing requirement over the emerging plan period.

With regards to Policy NZ1, Edenstone acknowledge and support the overarching ambition to enhance energy efficiency and sustainability standards in new residential developments. Addressing climate change and promoting net-zero carbon development are critical goals. However, we have several concerns regarding the practical implementation and implications of the policy as currently drafted. These concerns are outlined below:

Conflict with National Policy

The policy appears to conflict with paragraph 5.8.5 of Planning Policy Wales, which states that higher sustainable building standards should only be applied to strategic sites. Paragraph 5.8.5 emphasises that planning authorities should assess strategic sites to identify opportunities for requiring higher standards, such as zero carbon. These higher standards should be supported by robust evidence and must take into account the economic viability of schemes. Applying the standards outlined in Policy NZ1 to all residential developments, including non-strategic housing allocations, goes beyond the national policy framework and risks imposing onerous requirements on smaller sites, potentially undermining housing delivery.

Feasibility and Viability

While we recognise the importance of setting high energy efficiency standards, the specified requirements, including a space heating demand (SHD) of less than 25 kWh/m^2/yr and the generation of 40 kWh/m^2fp/yr of renewable energy, raise feasibility and financial viability issues. For example, energy modelling carried out using advanced methodologies such as Passive House Planning Package (PHPP) often yields SHD values significantly higher than the policy target. This was demonstrated in assessments of several of Edenstone's house types (e.g., Wye: 42–45 kWh/m^2/yr, Dartford: 65 kWh/m^2/yr, Tamar: 59–60 kWh/m^2/yr), even for homes designed to achieve EPC B+/A ratings.

Moreover, while achieving the target SHD via SAP may be feasible with additional costs, the policy appears to favour PHPP or similar modern methodologies, which could further increase costs and complexity. These factors may affect housing affordability and the financial viability of projects, particularly for small and medium-sized enterprises (SMEs).

Consistency and Complexity Across Local Authorities

A significant concern is the lack of consistency in energy standards across local authorities, which creates challenges for developers. Developing bespoke house types and specifications to meet differing local policies is neither practical nor financially viable. The industry would benefit from a standardised, national approach to energy performance standards, such as those proposed under Building Regulations and the Future Homes Standard. Local variation complicates feasibility modelling and risks discouraging development.

Practical Challenges in Implementation

We are also concerned about the practical challenges local authorities face in implementing and enforcing these standards. Instances from other areas, such as Cheltenham, suggest that while ambitious energy targets are set, they are often compromised during the planning process due to viability concerns or a lack of technical expertise to assess compliance. This creates inconsistencies and may undermine public confidence in the standards.

Renewable Energy Generation Requirements

The emphasis on on-site renewable energy generation is commendable, but the requirement to generate 40 kWh/m^2fp/yr or meet the annual regulated electricity demand could be overly rigid in some contexts. Achieving these targets may not always be feasible on sites with constraints such as limited roof space or shading. Furthermore, while improving building efficiency reduces the PV requirement to achieve net-zero regulated energy, adding PV to a slightly less efficient home often represents a more cost-effective path to net zero. Greater flexibility within the policy would enable site-specific, practical solutions without compromising overarching goals.

Public Perception and Communication

From a public perception standpoint, there is a risk that compromises on energy standards, even where justified on technical or viability grounds, may not be well received. It is crucial that the policy sets clear and achievable standards to avoid the need for perceived compromises, which could affect the public's perception of developers' commitments to sustainability.

Performance Gap and Compliance Costs

We support the principle of closing the performance gap through as-built performance surveys. However, this requirement introduces additional costs and administrative burdens, which could disproportionately impact SMEs. We urge careful consideration of these costs to avoid discouraging development, especially in areas with tight margins.

A Call for a Nationally Consistent Approach

While we support the policy's intent, we believe that a more consistent national approach to energy performance standards, via Building Regulations or the Future Homes Standard, would be preferable. This would provide clarity and consistency for developers across regions and ensure a level playing field, supporting the industry's ability to deliver both sustainable and affordable housing.

Conclusion

While we commend the ambition of Policy NZ1, its application to all housing allocations is inconsistent with paragraph 5.8.5 of Planning Policy Wales, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. We urge Monmouthshire County Council to reconsider the scope of Policy NZ1 and to align it with national guidance to maximise its effectiveness while minimising unintended consequences.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

In principle, Edenstone Homes support Strategic Policy S5 (Green Infrastructure) which requires development proposals to take both a strategic and proactive approach to placemaking. This will be achieved using a step wise approach supported by technical evidence such as Green Infrastructure Assessments to inform proposals at an early stage of the design process and secure the long-term delivery of multi-functional green spaces.

As demonstrated within the Green Infrastructure Strategy submitted as part of the Candidate Site process the proposed scheme has been informed by the site's setting and looks to actively respond to the area's natural characteristics. Most notably this includes the fact that built form/ residential development has generally been prioritised in the eastern section of the site thereby representing a logical extension to the existing urban area of Abergavenny.

On the other hand greater levels of public open space will be accommodated in the western portion to create a versatility area for residents to enjoy whilst simultaneously reducing the sites visual prominence within the wider surrounding landscape. This includes establishing suitable green buffers along the site's western boundary to naturally screen future development and therefore ensure there are no adverse impact on the wider surrounding landscape including views from the Breacon Beacons National Park further west.

In addition to the above a key theme throughout the scheme at Penlanlas Farm has been the desire to retain all existing trees, hedgerows and other vegetation, wherever possible. Collectively these features work together to support local species which shall be further enhanced through a comprehensive supplementary planting scheme. From a strategic perspective this approach will ensure the site remains in keeping with the wider landscape framework whilst contributing to MCC's objectives in terms of responding to the challenges associated with climate change, achieving a net benefit for biodiversity and creating a more resilient ecosystem across Monmouthshire.

In light of the above it is evident Land at Penlanlas Farm fully accords with the requirements of Strategic Policy S5 and will assist MCC in demonstrating that the proposed site allocation

adheres to the Welsh Government's expectations in adopting a step-wise approach as set down by Chapter 6 of PPW12.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Whilst we appreciate Strategic Policy S6 intends to ensure sufficient infrastructure is in place early on during the construction period to facilitate the delivery of future development sites. Edenstone query whether this is required as a separate policy given the need for physical, community and green/blue infrastructure will be assessed on individual site-by-site basis and secured via legal agreements in the form of a Section 106 within the planning application process.

Furthermore, where specific infrastructure works are necessary to facilitate the delivery of allocated sites such as HA5 - Land at Penlanlas Farm, these details are specified within the policies which correspond with those individual sites.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S7 (Affordable Housing) establishes MCC's target for affordable housing over the emerging plan period (2018-2033) as 1,595 – 2,000 homes. This will be achieved in a range of ways including a requirement for all new site allocations to deliver 50% affordable housing on-site which is similarly referenced within the wording for proposed site allocation ref. HA5 – Land at Penlanlas Farm.

In response to above, Edenstone Homes acknowledge the County's need to accelerate the delivery of affordable housing in response to local need and are committed to working collaboratively with the Council to help meet their affordable housing requirements. In previous representations Edenstone highlighted that the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments in accordance with Paragraph 4.2.31 of PPW which states, "*when setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable*".

Edenstone have submitted viability information throughout the RLDP process in relation to Land at Penlanlas Farm which clearly evidences the fact the site remains deliverable and shall make a meaningful contribution towards MCC's affordable housing requirement in accordance with Strategic Policy S7.

In principle Edenstone agree with Policy H8 (Housing Mix) which sets an expectation for future residential development to provide a range and mix of house types, tenure and size. However, for the purposes of deliverability it is important the RLDP acknowledged the need to provide sufficient flexibility in that respect to ensure proposed site allocations are able to respond to future market conditions.

For completeness we believe it would be prudent for such information to be included within Policy H8 or supporting text to explain appropriate contingency measures are in place to enable proposed site allocations such as Penlanlas Farm to come forward over the plan period. From Edenstone Homes' perspective the merits of which would mean providing sufficient certainty to demonstrate that the plan shall deliver within the allocated timeframe and thereby satisfies Test 3 of the Council's own Test of Soundness as defined by Section 64(2) of the 2004 Act and the Development Plans Manual.

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Edenstone Homes fully supports Land at Penlanlas Farm's progression as a proposed allocation which is identified as Policy HA5 within the Deposit Plan. As mentioned above the site plays a pivotal role in helping to deliver MCC's Spatial & Growth Strategies which intend to prioritise future development in the most sustainable locations throughout the region. Furthermore, given its position Land at Penlanlas Farm represents a logical extension to the defined urban area of Abergavenny, which as a primary settlement is expected to accommodate approximately 22% of Monmouthshire's housing provision over the plan period. Edenstone commends the approach MCC have adopted in terms of aligning future growth with existing infrastructure which verifies the fact the emerging RLDP accords with the objectives of Future Wales 2040 and PPW12.

By virtue of its location, Penlanlas Farm benefits from good connectivity to a range of local services and other supporting infrastructure. Most notably that includes the fact the site is situated within less than 25 minutes walking distance Abergavenny town centre, with other key facilities, including schools and health care providers in closer proximity. As shown within the Concept Masterplan whilst vehicular access will be achieved directly off Old Hereford Road the proposed scheme has been designed to ensure active travel routes are prioritised throughout the centre of the site. This approach corresponds with Welsh Government's Sustainable Transport Hierarchy and provides an opportunity to encourage residents to utilise more active forms of transport as opposed to private vehicles. This coupled with the fact Abergavenny Railway Station remains around 30 minutes' walk away from Penlanlas Farm reinforces Edenstone commitment to reduce carbon emission on site both during the construction and operational phases of development in line with MCC's environmental targets.

As explained within the Updated Green Infrastructure Strategy prepared by EDP the proposed layout for Penlanlas Farm has been informed by the site's physical characteristics and wider setting. Most notably this includes the fact that development will be prioritised in the eastern section of the site in order to assimilate the existing urban grain in this particular part of Abergavenny. On the other hand a concerted effort has been made to accommodate greater levels of public open space, an informal play area and a community orchard in the western portion. This arrangement intends to reduce the sites visual prominence within the wider surrounding landscape in accordance with the requirements of both Strategic Policy S8 and Policy HA5.

As a company Edenstone actively look to retain existing trees, hedgerows and associated vegetation on site, wherever possible. Like elsewhere this is certainly the case for Penlanlas Farm where the proposed scheme has been designed around a natural framework of field

boundaries. These have been incorporated into the fabric of the proposed layout and set to be further enhanced through supplementary planting with particular emphasis attributed to those situated along the site's western boundary. The latter will ensure development is naturally well screened and therefore ensure there are no adverse impact on the wider surrounding landscape including views from the Breacon Beacons National Park further west.

Policy S8 specifies that development must manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. We understand the information submitted to date provides MCC sufficient comfort that, where necessary, suitable mitigation is delivered on site which will include a series of natural attenuation basis and other SuDS features. Collectively these principles shall provide suitable mitigation in order to achieve a better in drainage terms and help improve the areas resilience to future flood risk events.

As demonstrated above, from a procedural standpoint the continued inclusion of Penlanlas Farm as a proposed site allocation is crucial to ensuring development is prioritised in the most sustainable locations and come forward in areas of greatest need. These principles accord with national policy and will help contribute to achieving a sound and deliverable RLDP.

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Strategic Policy S10 – Employment Sites Provision
- Edenstone Homes have no comments on Policy E1 – Protection of Existing Employment Land
- Edenstone Homes have no comments on Policy E2 – Non-Allocated Employment Sites
- Edenstone Homes have no comments on Strategic Policy S11 – Rural Economy
- Edenstone Homes have no comments on Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions

- Edenstone Homes have no comments on Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use
- Edenstone Homes have no comments on Policy RE3 – Agricultural Diversification
- Edenstone Homes have no comments on Policy RE4 – New Agricultural and Forestry Buildings
- Edenstone Homes have no comments on Policy RE5 – Intensive Livestock / Free Range Poultry Units
- Edenstone Homes have no comments on Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Policy EA1 – Employment Allocations
- Edenstone Homes have no comments on Policy EA2 – Protected Employment Sites

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Strategic Policy S12 – Visitor Economy

- Edenstone Homes have no comments on Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside
- Edenstone Homes have no comments on Policy T2 – Protection of existing tourism facilities

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)	
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Edenstone Homes supports the objectives associated with Strategic Policy 13 (Sustainable Transport) which sets a requirement for all development proposals to accord with the Sustainable Transport Hierarchy set out within PPW12 and Llwybr Newydd: Wales' Transport Strategy 2021. The basis of which has been informed by national planning guidance and looks to place greater emphasis on development being located and designed in a way which reduces the need for people to travel and the existing reliance on private vehicles.

As demonstrated within the Transport Assessment previously prepared by Lime Transport whilst the site will be served by a dedicated vehicle access off Old Hereford Road. The proposed junction and overall layout of the scheme have been designed to ensure active travel routes are given sufficient priority from an operational perspective and thus incorporated through the heart of the site. Most notably this includes enhancing existing footpaths and delivering dedicated pedestrian and cycle routes. These features have been prioritised in areas which benefit from a sense of natural surveillance and will be fitted with suitable lighting equipment. Collectively these features will create a safer and more attractive environment for future residents to use thereby incentivising more active forms of transport and in doing so reducing the dependency on private vehicles.

Whilst Edenstone recognises the value of maximising opportunities for active travel throughout all aspects of the proposed scheme. For success over the lifetime of the development it is important the proposed routes focus on connecting the site with key services and facilities located within the surrounding area of Abergavenny. These principles are clearly illustrated within the accompanying Concept Masterplan which reinforces the fact Land at Penlanlas Farm is inherently well connected to a range of local facilities including

schools, convenience stores, health care and modes of public transport. In turn the latter provides direct access to locations throughout Monmouthshire and slightly further afield thereby promoting a more sustainable pattern of development.

This approach reflects Edenstone's commitment to bringing forward Land at Penlanlas Farm in a manner which complies with both Welsh Governments and MCC's aspirations to ensure sustainable transport is recognised as a key placemaking principles for all future development.

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Strategic Policy S14- Town, Local and Neighbourhood Centres
- Edenstone Homes have no comments on Policy RC1 – Central Shopping and Commercial Areas
- Edenstone Homes have no comments on Policy RC2 – Primary Shopping Frontages
- Edenstone Homes have no comments on Policy RC3 – Local Centres and Neighbourhood Centres/Shops
- Edenstone Homes have no comments on Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Strategic Policy S15 – Community and Recreation Facilities
- Edenstone Homes have no comments on Policy CI1 – Retention of Existing Community Facilities
- Edenstone Homes have no comments on Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas
- Edenstone Homes have no comments on Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing
- Edenstone Homes have no comments on Policy CI4 – Areas of Amenity Importance

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Edenstone Homes have no comments on Strategic Policy S16 – Sustainable Minerals Management to Safeguarding
- Edenstone Homes have no comments on Policy M1 – Local Building and Walling Stone.
- Edenstone Homes have no comments on Policy M3 – Mineral Site Buffer Zones
- Edenstone Homes have no comments on Strategic Policy S17 – Sustainable Waste Management
- Edenstone Homes have no comments on Policy W1 – Waste Management Facilities
- Edenstone Homes have no comments on Policy W2 – Agricultural Land – Disposal of Inert Waste
- Edenstone Homes have no comments on Policy W3 – Identified Potential Waste Management Sites

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	✓
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

In conclusion Edenstone Homes are wholly supportive of Land at Penlanlas Farm's progression as a proposed allocation within the Deposit Plan. The site (Ref. HA5) has a pivotal in helping to deliver MCC's Growth Strategy which seeks to prioritise future development in the most sustainable locations throughout Monmouthshire.

Given its geographic position Penlanlas Farm represents a logical extension to the defined urban area of Abergavenny, which in turn is recognised as a primary settlement and is well served by existing supporting infrastructure. These principles fully accord Future Wales 2040, PPW12 and the Development Plans Manual (Edition 3) which further reinforces the acceptability of future development in terms of promoting a more sustainable pattern of development over the proposed plan period.

As demonstrated by the technical information provided to date, Land at Penlanlas Farm remains a suitable, deliverable and viable allocation for residential development to facilitate the delivery of much needed affordable and full market housing. As the proposed developer Edenstone are committed to ensuring the site is brought forward in line with the current housing trajectory in order to continue meeting the needs of local communities.

In light of the above Edenstone Homes supports the proposed Deposit Plan in which Land at Penlanlas Farm is a key component to help MCC reach its growth aspirations and demonstrate the emerging plan has been soundly prepared against all three tests of soundness defined by national policy.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	✓

	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	✓
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	✓

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

- EDENSTONE HOMES have no comments on Part 5

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

- EDENSTONE HOMES have no comments on Part 5

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1493

Vistry Homes Limited

RLDP Deposit Response on behalf of Vistry Homes re: Chepstow

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

The Deposit RLDP acknowledges that Monmouthshire has the highest average house prices in Wales, meaning a large proportion of people cannot afford to buy a home. However, it does not acknowledge that a key contributing factor to this issue, is a failure to plan for and deliver sufficient housing to meet the needs of the County. As set out in the Council's latest Annual Monitoring Report 2022, housing delivery records covering the 10-year plan period 2011 - 2021 show that the adopted Local Development Plan had delivered a shortfall of 1,500 homes (33.3%) when compared to the 10-year Plan requirement of 4,500 dwellings, which contributes to housing affordability issues. Vistry are concerned that unless the role of past under delivery of housing in worsening affordability is acknowledged, the Deposit Plan will not address the issue.

The RLDP Vision set out in the Deposit Plan states that:

"By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all,"

The Deposit Plan sets out a series of objectives to achieve the vision. Objective 10 Housing states:

"To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents."

The RLDP vision and associated housing objective do not acknowledge the identifiable need for market housing or the important role the delivery of market housing plays in addressing affordability issues.

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Strategic Policy S1 – Growth Strategy sets out that the Plan will make provision for 6,210 homes to meet a housing requirement of 5,400 homes, incorporating a 15% 'flexibility allowance'. The proposed level of growth represents a significant reduction from the evidence based level of growth identified at an earlier stage in the plan making process. The Preferred Strategy consultation in June 2021 made provision for 8,366 homes, incorporating a 10% flexibility allowance. The reduced growth levels proposed in the Deposit RLDP is a response to the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, made on the basis that it would undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south east region. Therefore the reduction in growth levels is not a response to the evidence or the key issues facing Monmouthshire, in particular the issues of housing affordability and an ageing demographic. This is underlined by the findings of the Integrated Sustainability Appraisal (ISA) assessment of reasonable alternatives which identifies 2021 Preferred Strategy growth levels performing better than Deposit Plan growth levels.

Regarding the Plan's general conformity with Future Wales 2040, national policy does not set a housing requirement for Wales or the regions, nor does it specifically preclude the level of growth presented in the 2021 Preferred Strategy. No evidence has been presented to demonstrate that higher levels of growth in Monmouthshire will undermine the National Growth Area. On the contrary there is a clear case to be made for increasing housing delivery across the board in Wales. Data from Stat Wales shows a steady decline in housing building activity with average output falling by 45% from over 9,200 in the 1990s to 5,110 dwellings in the first four years of the 2020s. This is underlined by the Competition and Marketing Authority report (February 2024) into housebuilding across the UK, which concluded that in Wales "*too few houses are being built, especially in the areas in which they are most needed, which is having a negative effect on affordability.*"

The RLDP is being prepared to cover the period between 2018-2033. The RLDP plan period has not been adjusted despite significant delays in the plan preparation process. When preparation commenced in 2018, the original Delivery Agreement anticipated adoption in December 2021, it has now been moved back to May 2026, a delay of almost 5 years. As a result, assuming no further delays, when the plan is adopted it will be more than half way through the plan period. This will be problematic for the test of soundness that the proposals are deliverable within the timeframe of the plan.

The plan period overlaps with that of the adopted 9,866 homes LDP (2011-2021) by 3 years. The Deposit Plan and associated Housing Background Paper do not provide a clear explanation of the relationship between the housing requirement of the adopted LDP and the RLDP. As set out in the Council's latest Annual Monitoring Report 2022, housing delivery records covering the plan period show that there has been a shortfall of 1,500 homes (33.3%) against the Plan requirement of 4,500 dwellings. Despite this the Deposit Plan relies on houses that have been delivered since 2018/19 as a significant component of its housing supply (2,220 homes) without acknowledging the historic shortfall against the housing requirement of the adopted LDP. In the interests of clarity and to ensure housing completions are not being double counted, the plan period should begin no earlier than 2021. The undersupply of 1,500 homes against the housing requirement of the adopted LDP should be brought forward and added to the requirement of the RLDP as set out in the Preferred Strategy 2021, which would require the provision of 9,866 new homes. This is necessary to ensure the plan is appropriate and deliverable.

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Vistry supports the overarching principle that growth should be focused on the most sustainable settlements in line with the settlement hierarchy shown in Policy S2. Vistry supports the broad distribution of development that directs the majority of development to the Primary Settlements. However, the distribution of development amongst these Primary Settlements does not reflect the findings of the Sustainable Settlement Appraisal. Based on the findings of the Sustainable Settlement Appraisal, Chepstow is ranked as the second most sustainable settlement in the County behind Abergavenny. However, only 13% of the indicative development is directed to this Primary Settlement compared to 35% at Caldicott. Vistry consider that the amount of development proposed at Chepstow and Monmouth does not reflect the sustainability of the settlements or the availability of suitable sites.

In line with our comments on Policy S1, Vistry is concerned that completions from 2018 account for a substantial component of the housing supply. The Housing Background Paper has not adequately explored delivery against the housing requirements of the adopted LDP. Vistry consider that the plan period should begin no earlier than 2021 with only completions from that date counted

towards the housing supply. Any undersupply against the housing requirement of the adopted LDP should be brought forward and addressed by the RLDP.

The spatial strategy is disproportionately reliant on two strategic sites, located at Abergavenny and Caldicott. Together they account for 60% of the proposed allocations and 20% of the overall housing provision. As noted in our response to Policy S1, the adopted LDP registered a shortfall of 1,500 homes against its housing requirement. This shortfall is largely attributable to the lead in period of the strategic housing sites. The reliance of the spatial strategy on two large strategic sites risks a similar shortfall occurring during the timeframe of the RLDP. It also makes the RLDP particularly vulnerable to any delays in the delivery of these sites. As we will discuss further in relation the individual allocations, Vistry consider the housing trajectory at Appendix 9 to be overly optimistic with regards to these large strategic sites. As such, it is considered that the spatial strategy will not be delivered within the timeframe of the plan.

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

Under Policy GW1 Green Wedges have been designated in various locations including the land between Chepstow, Pwllmeyric and Mathern. Vistry are promoting Land at St Lawrence Lane (CS0112) for residential development, as set out in the promotion document and supporting technical documents submitted to the Call for Sites. The site lies within the Green Wedge as designated by Policy GW1. However, the development proposals are designed in such a way that a smaller Green Wedge could be maintained to ensure no coalescence of these settlements, whilst delivering well-designed, additional housing in a sustainable location. A revised Green Wedge boundary could be formed by existing and proposed landscape features to create a strong green boundary in perpetuity, that protects important views. The development could also create a positive new, landscaped edge to Chepstow, along with improving the character of the A48 on the approach to Chepstow through enhanced boundary features and green infrastructure, in addition to creating sustainable connections between the settlements.

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

Vistry support the provision of appropriate infrastructure to facilitate and serve housing and economic development. However,

it is important that infrastructure requirements are proportionate to development and do not impact negatively on development viability to the extent that the proposals in the plan are not delivered within the timeframe of the plan. To this end, it is important that the impact on development viability is robustly assessed at the plan-making stage. The Preliminary Viability Report October 2024 states at para 5.38:

"for individual candidate sites (Appendix B), site-specific allowances have been made for s106 obligations in the amounts shown at Appendix B. In some cases these have been "rounded" by the site promoter in their FVA; but none of the allowances is considered to be an under-estimate."

Appendix B sets out per dwelling S106 costs that vary significantly from site to site. No evidence is provided to justify these cost inputs and no explanation is provided on what they cover. The Infrastructure Delivery Plan Background Paper October 2024 provides a schedule of infrastructure requirements for each site with estimated costs where they are known. It is concerning that for the majority of the requirements the estimated costs are labelled TBC, this in itself casts serious doubts over the robustness of the viability assessment. Notwithstanding, analysis of the Background Paper suggests that the allowances in the Viability Report are under-estimated. For example Land to the East of Abergavenny (CS0213) a development of 500 homes is given an allowance of £3,735, which appears to be low for the scale of development. The Background Paper gives a public transport financial contribution of £1,250,000, which alone equates to £2,500 per dwelling. On top of this financial contributions may be required for improvements to Abergavenny Station (cost tbc), education and school transport costs (cost tbc), a commuted sum for recreation and open space adoption (cost tbc) with additional contributions if insufficient provision is not made on site. Although not referenced in the Background Paper, based on Policy S1 contributions might also be sought for community and cultural facilities, Welsh language facilities, waste management facilities and health infrastructure. It is concerning that the Background Paper does not give consideration to the full list of requirements outlined in Policy S6, in particular health infrastructure. Overall, Vistry consider that there is insufficient evidence and assessment of the impact of infrastructure requirements on the development viability. Consequently, there will be an over reliance on viability testing at the application stage which will in turn lead to delays and undermine the delivery of the planned levels of growth and associated infrastructure.

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

Policy S7 sets out an affordable homes of 1,595 – 2000 homes. Delivery of this target is reliant on all new site allocations and sites of 20 homes or over providing 50% affordable homes on site. Based on Vistry's direct and recent experience developing homes in the County, we consider this target to be undeliverable, which is fundamental to the soundness of the entire plan as it means that the plan will not deliver and will not address local issues of affordability and ageing demographic.

One only needs to look at the record of the strategic sites in the adopted LDP to see that 50% affordable housing will not be deliverable. For example Deri Farm (SAH1) a development of 250 homes, which delivered just 49 affordable homes (20%). As set out in the AMR delivery was slow due to viability issues. Crick Road (SAH2) a development of 269 homes, which delivered just 68 affordable homes (25%). Fairfield Maybe (SAH3) a development of 450 homes that will deliver just 18 affordable homes (4%). Wonastow Road (SAH4) the first phase of development delivered 340 homes of which 102 were affordable (43%). Rockfield Farm a development of 266 homes with 67 affordable homes (25%). Vinegar Hill (SAH6) a development of 155 homes of which 39 are affordable (25%). Former Paper Mill (SAH7) a development of 192 homes of which 20 are affordable (10%). On average just 21% of the homes on the above sites have been affordable homes.

It is difficult to believe that site allocations in the RLDP will provide 50% affordable housing when the strategic sites in the adopted LDP were not able to meet a lower requirement of 35%. Vistry are concerned that the viability assessment has not been robustly evidenced and is reliant on overly optimistic assumptions made by developers, influenced by the Councils messaging that sites will not be allocated unless they can demonstrate delivery of 50% affordable housing. As such, the Plan is neither appropriate nor effective as it does not set an appropriate affordable housing target, which will undermine housing delivery. It is Vistry's opinion that the overall level of housing growth should be increased to allow overall affordable housing need to be met via a lower affordable housing requirement as a percentage of allocated sites.

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Vistry supports the identification of Land at Mounton Road, Chepstow for development of 146 homes. Vistry are promoting the adjacent site, Land at St Lawrence Lane (CS0112), for residential development as set out in the promotion document and supporting technical documents submitted to the Call for Sites. As noted in our response to Policy S2, Vistry consider that the amount of development proposed at Chepstow does not reflect the sustainability of the settlement or the availability of suitable sites. Land at St Lawrence Lane is available, suitable and deliverable for development and should be included as a residential site allocation to form a comprehensive extension to the settlement, alongside Land at Mounton Road.

Together, the two sites could deliver around 400 homes, providing a significant boost to affordable housing delivery, and a range of community benefits, including improved connectivity to the town centre, including an upgraded pedestrian/ cycling route and controlled crossing, encouraging walking and cycling to facilities over car use, as well as a significant new area of public open space including recreational and play facilities as well as offering gains to habitats and biodiversity.

As per comments made in relation to Policy S2, Vistry considers the spatial strategy to be disproportionately reliant on two large strategic sites, Land to the east of Abergavenny (HA1) and Land to the east of Caldicot (HA2), which is likely to result in under delivery of housing. The trajectory assumes Caldicot East will begin delivering completions in 2027/28, with Land east of Abergavenny delivering first completions in 2028/29. For both sites it is assumed that time between submission of planning application to determination will be just 12 months and commencement on site just 6 months from planning consent. In Vistry's opinion, which is based on extensive experience, these timescales are over optimistic and entirely unrealistic. For comparison, the well regarded analysis of delivery timescales by Lichfields, Start to Finish, indicates that sites of between 500-999 homes take on average five years from first submission of a planning application through to first dwelling completion. At a local level, analysis of the strategic sites within the adopted LDP indicates an average period of time from the submission of the first planning application to first completion of four years. In addition to unrealistic delivery timescales, Vistry considers the delivery rate of 125 homes per annum for Land to the east of Caldicott to be unrealistic.

These two sites account for a significant proportion of housing requirement and therefore it is imperative that the housing trajectory is realistic and deliverable. Delivery against the housing

trajectory is fundamental to the soundness of the plan. Therefore the housing trajectory should not be based on unrealistic assumptions. Vistry consider that increasing the number of sites allocated would make the plan more robust and less susceptible to being derailed by delays in the delivery of one site.

Do you consider that the Plan is sound?
No

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)

Fails Test 3: Will the Plan deliver (is it likely to be effective)?
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

As set out in our response to Policy S1, the planned levels of housing growth are not appropriate for the area in light of the evidence and will not address key issues of housing affordability and an ageing demographic. Vistry believe the growth levels set out in the Deposit Plan will lead to a continuation of the trend nationally and locally of building too few houses thereby worsening the issues of housing affordability and an ageing demographic. As such, the plan is not appropriate for addressing local issues, as the Councils own evidence demonstrates. Notwithstanding the Welsh Government objection, reduced growth levels are not required to ensure consistency with national policy. The plan should revert to the levels of growth previously proposed in the 2021 Preferred Strategy.

As set out in our response to Policy S1, the plan period is not appropriate nor effective. It is not appropriate as it overlaps with the adopted LDP and does not address the shortfall against the adopted housing requirement with housing completions in the overlapping period being in effect double counted. It is not effective as delays to the plan preparation period mean that adoption will take place beyond the half way point of the plan period, leaving insufficient time to deliver strategic sites. The plan period should be adjusted so that at the very least it does not overlap with the adopted LDP and under delivery against the adopted LDP should be added to the housing requirement for the RLDP.

As set out in our response to Policy S2 and the housing allocations, the Plan is not appropriate or effective as the distribution of development does not reflect the sustainability of Chepstow and is overly reliant on two strategic sites that have unrealistic delivery assumptions within the housing trajectory. The number of housing allocations should be increased to reduce the plans vulnerability to any delays in the delivery of strategic sites, and Land at St Lawrence Lane Chepstow should be allocated to provide adequate housing growth at Chepstow.

As set out in our responses to Policy IN1 and S7, the Plan will not deliver because it is not underpinned by a robust viability assessment. Based on Vistry's direct and recent experience developing homes in the County, we consider the target of 50% affordable housing for allocated sites to be undeliverable, which is fundamental to the soundness of the entire plan as it means that the plan will not deliver and will not address local issues of affordability and ageing demographic.

1502

Hallam Land Ltd

Our Ref: 17.236
Date: 16 December 2024

Planning & Development Consultants
Ymgynghorwyr Cynllunio a Datblygu

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS
[redacted]

Planning Policy Services
Monmouthshire County Council
County Hall
Rhadyr
Usk
NP15 1GA

Dear Sir or Madam,

Monmouthshire Replacement Local Development Plan (2018-2033)
Representations to the Deposit Plan (October 2024)

Further to the publication of the Monmouthshire Replacement Local Development Plan (LDP) Deposit Plan in October 2024, representations to the Deposit Plan are submitted by Asbri Planning Ltd on behalf of Hallam Land Ltd.

These representations are provided further to the following submissions on behalf of Hallam over the course of the Replacement LDP preparation process to date:

- LDP Review Report, November 2017 (representations submitted February 2018)
- Stage 1 Candidate Sites (submission November 2018)
- Growth & Spatial Options Consultation (June 2019) (representations submitted August 2019)
- Growth & Spatial Options Consultation (December 2020) (representations submitted January 2021)
- Preferred Strategy, June 2021 (representations submitted August 2021)
- Stage 2 Candidate Sites (submission August 2021)
- Preferred Strategy December 2022 (submitted February 2023)

Hallam is promoting Land at Chapel Farm, Abergavenny (Candidate Site Ref. CS0128) for residential development. These representations focus on the proposed designation of the Chapel Farm Candidate Site (and adjacent land) as a green wedge under Deposit Plan Policy GW1 (a), or reference AG8.

In the 'Green Wedge Assessment Final Report March 2024' prepared by LUC, which is an evidence base document for the Replacement LDP, paragraph 1.3 states that "*MCC has identified the need to consider the potential for green wedge designations adjacent to Abergavenny, although only in locations between the town and the statutory designation Bannau Brycheiniog National Park*", stating that this is in response to "*text in Planning Policy Wales*". This text is quoted in paragraph 1.8 of the Green Wedge Assessment and refers to text within paragraph 3.68 of PPW which states that green wedges "*may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area*".

It is acknowledged that PPW paragraph 3.68 states that green wedges "***may** be used to provide a buffer between the settlement edge and statutory designations….*" **[our emphasis].** However, paragraph 3.64 of PPW also states that "*Proposals for both Green Belts and green wedges **must be** soundly based and **should only be** employed where there is a **demonstrable need** to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust*" **[our emphasis].**

Paragraph 3.64 is mentioned specifically in the 'South East Wales Green Wedge Definition Criteria Method Statement March 2024' prepared by LUC, and it mentioned in the Green Wedge Assessment, but not in the context of paragraph 1.8 of the Green Wedge Assessment which is *why* green wedges have been considered. Paragraph 1.10 of the Green Wedge Assessment states that "*the identification of a 'demonstrable need' for*

protection of the urban form that PPW identifies as a prerequisite for green wedge designation, was met when the existing green wedges were defined and is considered by MCC to still exist." and that *"For Abergavenny, the only location in which new green wedge definition is being considered, MCC have identified sufficient development pressure to warrant further analysis."*

However, at the time the previous green wedges were identified (during the preparation of the adopted LDP, which was adopted in February 2014) the policy regime was very different. TAN1 was still in force therefore there was a very real prospect of development occurring outside settlement boundaries. The PPWs in place during the preparation of the current LDP were PPW4, 5 and 6, all of which had essentially the same tests as PPW12 regarding the suitability of green wedges and whether they are the most appropriate tool to provide the necessary protection, and this is acknowledged in the South East Wales Green Wedge Definition Criteria Method Statement.

The Notification requirements for local planning authorities changed in 2020 so that major residential development (i.e. over 10 dwellings or over 0.5 hectares) that does not accord with the development plan needs to be referred to the Welsh Government whereas in 2014 that threshold was 150 dwellings or 6 hectares. The current policy regime is therefore much tighter in this regard.

Consequently, the council has failed to demonstrate that a green wedge in this location *should only be employed where there is a demonstrable need* as other policies, during the time period of the LDP, will provide sufficiently robust policy mechanisms to control development in AG8.

Notwithstanding the above, the designation of land north of Abergavenny as green wedge (AG8, 9 and 10) to protect the setting of the town from Bannau Brycheiniog National Park is illogical given the proximity of existing development to the existing national park boundary. Existing development between Chapel Lane to the west and Pen y Pound to the east extends up to Chain Road to the north, which shares the boundary with the national park.

The same applies to the existing development further to the east/north east, to the north of Underhill Crescent, which is approx. 165m from the national park boundary, as well as land further to the east around the northern end of Llwynu Lane where it meets Old Hereford Road, and land to the west of Llwynu Lane, which is circa 180-220m from the national park boundary.

At present, the closest point of development at Pentre Road in the vicinity of Windsor Road/ Haven Way/Cresta Road/Meadow Lane (i.e. Candidate Site CS0128 and AG8) is circa 360m to 420m.

In addition to the above, Housing Allocation HA5 Land at Penlanlas will deliver approx. 100 homes in a 6.17ha site that at its closest point will now be approx. 30m from the national park boundary. This north western tip of HA5 is identified in the Green Wedge Assessment as being an area of Moderate-High potential for a green wedge (the same as AG8) and it lies within AG10. However, not only is this parcel of AG10 not designated as green wedge, it is allocated for housing development in HA5.

Whilst it is acknowledged that development in HA5 may not occur right up to the northern tip of the site and indeed the draft policy states that there will be lower density and a buffer to the north/north west of the site, substantial residential development on that site will still be significantly closer than any development on CS0128. This demonstrates an inconsistent application of the Council's own methodology.

Further, the split between AG9 and AG10 is an arbitrary line that does not follow any existing physical features or boundaries and is therefore contrary to PPW paragraph 3.70 and the Green Wedge Method Statement, another example of inconsistent application of the green wedge guidance.

The closest proposed built form in the masterplan for CS0128 at Land at Chapel Farm comprised some isolated dwellings, approximately 50m from the national park boundary. At the western end of the proposed masterplan for CS0128 the closest dwellings, which are again proposed in a loose knit arrangement, sit approximately 120m from the national park boundary.

The bulk of the development on the proposed Chapel Farm masterplan however is located on the southern portion of the site, and extends up to a hedgerow which runs roughly east west across the site, in line with the northern boundary of the curtilage of Skye House – this hedgerow is approx. 170m – 290m from the national park boundary. This is significantly more than a number of the existing distances between the national park boundary and existing built form, but particularly so in the context of proposed allocation HA5 Land at Penlanlas, even with the proposed lower density development and buffer to the north/north west of HA5.

As such, the exclusion of the southern portion of CS0128 from the green wedge would still leave a band of green wedge south of Pentre Lane that is a) wider than many bands of green wedge further to the east, and b) substantial in its own right, notwithstanding the examples to the east. Further, the southern boundary of a reduced green wedge in this area would follow an existing, logical boundary in the form of a hedgerow, which follows PPW guidance on drawing green wedge boundaries, and is a much stronger delineation of a green wedge boundary than the wholly arbitrary split between AG9 and AG10.

Conclusion

Consequently, it is not considered that the designation of the entire area of land between Pentre Road and Pentre Lane is sound as:

- No demonstrable need has been demonstrated
- Other policy mechanisms that exist are sufficiently robust to protect the site from 'inappropriate development'
- The designation of the green wedge is inconsistent with other parts of the northern built form in Abergavenny
- The split of AG9 and AG10 is arbitrary and doesn't follow PPW guidance or the Council's own evidence base
- Development on the southern portion of CS0128 in particular would have far less of an impact on the national park than HA5, notwithstanding the buffer zone and lower density development, given the proximity of the HA5 allocation to the national park boundary. This is compounded by the fact that HA5 is smaller than CS0128 (6.17ha compared with approximately 7.9ha for CS0128) and the northern element of HA5 comes to a point whereas the northern boundary of CS0128 is flatter, thereby providing a more robust buffer between proposed built form and the national park than can be achieved in HA5
- The designation of the green wedges along the northern boundary has been applied inconsistently and not in accordance with PPW or the Council's own evidence base

As such, the proposed designation of AG8, AG9 and AG10 fail all three Tests of Soundness for the following reasons:

- Test of Soundness 1
    - the designation does not accord with PPW as it does not comply with PPW guidance on green wedge designations
- Test of Soundness 2
    - the designation is not based on robust and credible evidence as it contradicts with the Council's own Green Wedge Method Statement evidence base
    - the rationale behind the designation has not been demonstrated
    - the split of AG9 and AG10 and the allocation of HA5 is not logical or reasonable, whereas a split through AG8 would follow a logical and reasonable boundary, which would result in a logical and reasonable allocation of CS0128
    - the AG8, AG9 and AG10 designations and the allocation of HA5 are not coherent and consistent as described above and as they don't align with the Council's own Green Wedge Method Statement evidence base

    - the AG8, AG9 and AG10 designations and the allocation of HA5 are not clear and focussed as described above and as they don't align with the Council's own Green Wedge Method Statement evidence base
- Test of Soundness 3
    - the plan will not be effective given the inconsistent application of the Council's own evidence base between AG8 and AG9/AG10, and by extension the inconsistent designation of HA5 and not CS0128

We trust that these representations are appropriately made but please do not hesitate to contact me should you have any questions.

Yours sincerely,



Enc. Hallam Land Ltd

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Hallam Land Ltd	Asbri Planning Ltd
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. n/a		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
	Support:	

Is your representation in support or objection?	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

See previous representations to the following RLDP consultation documents:

- Growth & Spatial Options Consultation (June 2019) (representations submitted August 2019)
- Growth & Spatial Options Consultation (December 2020) (representations submitted January 2021)
- Preferred Strategy, June 2021 (representations submitted August 2021)
- Stage 2 Candidate Sites (submission August 2021)
- Preferred Strategy December 2022 (submitted February 2023)

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

See previous representations to the following RLDP consultation documents:

- Growth & Spatial Options Consultation (June 2019) (representations submitted August 2019)
- Growth & Spatial Options Consultation (December 2020) (representations submitted January 2021)
- Preferred Strategy, June 2021 (representations submitted August 2021)
- Stage 2 Candidate Sites (submission August 2021)
- Preferred Strategy December 2022 (submitted February 2023)

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

See covering letter accompanying this representation form

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please see covering letter

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

13.	Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

n/a

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

See covering letter

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x

Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?	x	Fails Test 3: Will the Plan deliver (is it likely to be effective)?	x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

See covering letter

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine

the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1503

Redrow Homes (South Wales) Limited

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	[redacted]	[redacted]
Address:	[redacted]	[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Objective 10 (Housing)

Objective 10 (Housing) states:

"To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents."

This objective is overwhelmingly focussed on affordable housing delivery. Whilst there is clearly a need for increased affordable housing provision this does not mean that the private market should be discounted altogether. Increased open market housing would enhance affordable housing delivery by ensuring that the private sector delivers considerable numbers of affordable homes through S106 agreements. Indeed, an appropriate mix of open market and affordable housing will enable Monmouthshire to meet its core purpose of building sustainable and resilient communities for all. This is emphasised by paragraph 4.2.1 of Planning Policy Wales which states that *"new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs, and contribute to the development of sustainable and cohesive communities."*

As such, Objective 10 should be amended so that it acknowledges the vital contribution that open market housing plays in overall housing delivery and affordable housing delivery. This amendment will ensure that Objective 10 meets the first test of soundness (Does the plan fit?).

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S1 – Growth Strategy

Strategic Policy S1 states:

"In order to meet Monmouthshire's core purpose of building sustainable and resilient communities for all, between 2018 and 2033 the Plan will make provision for:

- *6,210* homes to meet a housing requirement of 5,400 homes.*
- *A minimum of 38ha of employment land (Use Classes B1, B2, B8).*

The focus of this growth will be on the County's most sustainable settlements, as outlined in the sustainable settlement hierarchy set out in Policy S2.

**This figure includes and indicative 15% flexibility allowance."*

It is noted that the flexibility allowance has increased from 10% in the first Preferred Strategy to 15% in the Deposit Plan and is in conformity with the growth aspirations for Monmouthshire put forward by the Welsh Government. However as set out below, it is considered that the identified housing requirement including 15% flexibility allowance set out in Policy S1 should be the absolute minimum that the RLDP commits to deliver.

As set out in the Local Housing Market Assessment (LHMA) Refresh 2022-2037, which forms part of the RLDP evidence base, as of January 2024 there were 3,704 households registered on Monmouthshire Council's common housing register, of which 2,064 have a recognised need. The number of households registered accounts for 9.0% of the total households in Monmouthshire (which was recorded as 40,922 in the 2021 Census).

It is noted that in the LHMA Refresh, the recorded completions from 2018/19 to 2023/24 are 2,220 units. Excluding the flexibility allowance, this leaves 3,180 dwellings to be delivered in the remainder of the Plan period to 2033. However, as of January 2024, the number of households on the common housing register exceeds this residual requirement by 116.5%. As the common housing register does not account for households who can afford to buy or rent on the open market, it is evident that the housing requirement is not sufficient to support the housing needs of Monmouthshire going forward. Even with the 15% flexibility allowance, the common housing register accounts for 92.8% of the residual requirement for the Plan period, without considering those who can afford to buy or rent in the open market sector.

As such, it is evident that the 15% flexibility allowance on Monmouthshire's housing requirement should be included in Policy S1 as an absolute minimum with a view to achieving and exceeding the minimum requirement which itself should be viewed as a floor

to development rather than a ceiling. The inclusion of the 15% flexibility allowance as a minimum will ensure that Strategic Policy S1 achieves the third test of soundness (Will the plan deliver?).

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 - Spatial Distribution of Development, Settlement Hierarchy

The categorisation of Monmouth as a Tier 1 Primary Settlement in Strategic Policy S2 is endorsed, with the town boasting a good level of retail, education, health, cultural, sporting and public transport as evidenced in the Sustainable Settlement Appraisal.

The tier-table in Strategic Policy S2 allocates an indicative number of homes for Monmouth of 923 (including the 15% flexibility allowance) which accounts for 15% of the distribution of the proposed homes across Monmouthshire during the RLDP period. The 923 dwelling allocation for Monmouth should be considered to be an absolute minimum to ensure that the minimum housing needs of this top tier settlement can be achieved during the RLDP period. It is noted that a significant proportion of the allocations for Monmouth are from roll over allocations that failed to deliver during the current plan period and that the new allocation at Dixton Road is required to ensure the integrity of the housing land supply in Monmouth.

The inclusion of the 923 dwelling allocation for Monmouth as an absolute minimum will ensure that Strategic Policy S2 meets the third test of soundness (Will the plan deliver?).

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	Yes
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. **Policy NZ1 – Monmouthshire Net Zero Carbon Homes** Policy NZ1 states: *"All new build residential development will be required to demonstrate compliance with the standards outlined below through the submission of an appropriately detailed, RICS-aligned operational energy assessment with any planning application resulting in the creation of 1 or more dwellings. Development proposals for new homes must demonstrate the following:* • *Space heating demand less than 25 kWh/m²/yr;*		

• *On-site renewable energy generation to deliver the greater of: - matching the annual regulated electricity demand of the development; or - generating at least 40 kWh/m²fp/yr.*

• *EPC A or equivalent in accordance with the current version of the National Calculation Methodology for assessing the energy performance of dwellings;*

• *New homes must not connect to the gas grid and all heating and hot water needs should be met by low carbon heating systems. No fossil fuel systems are to be used on-site;*

• *ULEV charging infrastructure must be provided to every dwelling.*

All developments must submit an as built performance survey following construction and prior to occupation of the home/s to demonstrate that they have been built to the applicable standards and minimise the 'performance gap.'

It is observed that the wording of Policy NZ1 requires "all new build residential developments" to demonstrate policy compliance. However, it is considered that it would not be possible to provide all of the information required to demonstrate compliance with Policy NZ1 at the outline planning application stage and that the information requirements for Policy NZ1 can only be expected to be provided at detailed (reserved matters) stage.

With regards to the requirement to demonstrate a space heating demand of less than 25 kWh/m^2/yr, it is considered that further information needs to be provided to developers on how the LPA intends to measure space heating demand as without detailed guidance it is not possible to say whether this target is achievable or not. There needs to be clarity on where the measurement point begins (for example, if the guidance were to require developers to take the heating demand before the efficiency of an air source heat pump is factored into the heating load, then the efficiency of the heating pump could not be included in the calculation of demand).

In relation to the requirement for all new build residential developments to be rated EPC A or equivalent, we note that new build homes typically achieve an EPC rating of B as there are considerable cost implications associated with achieving EPC A that have to be considered in the context of all of the other demands that impact on development viability. It is therefore suggested that the EPC A requirement in Policy NZ1 be amended to EPC B to ensure that Policy NZ1 can deliver the homes Monmouthshire needs (i.e. the amendment is required to ensure Policy NZ1 meets the third test of soundness (Will the Plan deliver?)).

With regards to the requirement for ULEV charging infrastructure on every dwelling, it is considered that this could be removed from Policy NZ1 as this will be included in legislation following the upcoming amendments to Building Regulations as indicated in recent Welsh Government consultation. The removal of this requirement from the RLDP will ensure that there is no overlap with Building Regulations ensuring that Policy NZ1 achieves the third test of soundness (Is the Plan deliverable?).

In relation to the submission of built performance survey, whilst in principle the initiative to reduce the gap between design and 'as built' performance is supported, there are concerns that an initiative to give preferential branding or certification to homes that *were* tested may negatively impact the marketing of homes that are not tested. As with the measurement of space heating demand above, further guidance is required on what the LPA is expecting.

Finally, there must be some flexibility introduced for the requirements of Policy NZ1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy NZ1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes Monmouthshire needs could be compromised.

As such, Policy NZ1 should be amended as suggested above to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Yes
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S6 – Infrastructure

Policy S6 states:

"…In the event that viability considerations indicate that not all the identified contributions can be reasonably required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of residential developments, priority will

be given to the affordable housing requirement set out in Policy S7 unless there is an overwhelming need for the contribution, in whole or in part, to be allocated for other necessary purpose/s."

The consideration of viability that is given in Policy S6 is endorsed and is consistent with PPW 4.2.21 which states:

"Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits which are reasonably related in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site's delivery."

It is therefore considered that Policy S6 meets the tests of soundness.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy H8 – Housing Mix

Policy H8 requires development proposals of 10 or more new homes to be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included within the RLDP.

The LDP seeks a high proportion of affordable homes as well as ambitious policies for net zero carbon homes. If these policies are going to be met it is essential that the mix of dwellings on the open market element is of a sufficient value to make the Council's policy aspirations deliverable. The Council needs to ensure that it does not undermine site viability by being overly prescriptive on dwelling mix and as such, it is considered that Policy H8 be deleted from the RLDP.

Policy S7 - Affordable Housing

Policy S7 requires on-site provision of 50% affordable homes on all new site allocations and sites of 20 homes and over within existing settlement boundaries. Whilst it is understood

that it is a core RLDP objective to deliver much needed affordable homes in Monmouthshire, Policy S7 must allow for viability to be considered.

To not do so could jeopardise the delivery of entire allocations which could result in a reduction in the delivery of market and affordable housing across the primary settlements in Monmouthshire. The non-delivery of even a few residential allocations would result in Monmouthshire not meeting its housing needs for the Plan period and would diminish the overall output of affordable housing.

It is noted that the Council has ambitious policies for both affordable housing and net zero homes. In working towards delivery of these it will be necessary to carefully consider site viability and there must be some flexibility in both Policy S7 and H* to ensure that necessary new homes are built.

The blanket approach to the 50% affordable housing requirement across site allocations fails to take into account the unique technical complexities of each individual allocation that are required to be overcome before sites can be delivered. This is in direct contrast to PPW paragraph 4.2.32 which states that:

"When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable." (Lichfields emphasis)

To ensure that Policy S7 complies with national policy and does not risk the delivery of market and affordable housing on allocated and large sites, the Policy should be amended as follows:

"The affordable homes target for the Plan period of 2018 – 2033 is 1,595 – 2,000 homes. This will be delivered in accordance with the following framework:

i) New site allocations – On-site provision of 50% affordable homes (subject to viability) on all new site allocations.

ii) Sites of 20 homes and over – On-site provision of 50% affordable housing (subject to viability) applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iii) Sites of 5 to 19 homes – On-site provision of 40% affordable housing (subject to viability) applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iv) Sites of 1 to 4 homes – Financial contributions towards the provision of affordable housing (subject to viability) in the local planning authority area will be required in accordance with details set out in the Affordable Housing Supplementary Planning Guidance.

v) Conversions and sub-divisions – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in Affordable Housing Supplementary Planning Guidance.

In determining how many affordable homes should be provided on a development site, the figure resulting from applying the proportion required to the total number of dwellings will be rounded to the nearest whole number, where half rounds up.

All proposals must meet national policy guidance in relation to the most efficient use of land and should not be subdivided or phased in an attempt to avoid on-site provision of affordable homes.

This Strategic Policy applies to all residential planning applications. Exceptions will not be made for sites that previously had planning permission and have been resubmitted."

Without the above amendments and consideration of viability, it is considered that Policy S7 fails to achieve each of the three tests of soundness.

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy HA4 - Land at Leasbrook, Monmouth

The allocation of Land at Leasbrook for residential development is endorsed. The allocation assists in delivering the RLDP vision, in particular supporting people living in sustainable resilient communities with better access to local services and facilities, open space and employment opportunities. As explained in our representations to Policies S1 and S2, the Land at Leasbrook allocation is essential to ensuring that the housing needs of Monmouth (and also, the housing needs of Monmouthshire) are met during the RLDP period.

However, it is noted that the scheme has evolved and so the indicative masterplan shown on page 132 of the Deposit RLDP needs to be revised so that the open space in the far north is moved south as this will form part of the SUDS function. As set out in Policy HA4, the Masterplan is being prepared and will be agreed with the LPA prior to the determination of any planning application.

As drafted, Policy HA4 requires *"provision of a public transport link through the site if necessary, details of which to be agreed with the Council, including any necessary financial contributions to improve public transport services and nearby infrastructure."*

[redacted] note that given the proximity of the Site to the bus stop on Dixton Road a public transport route within the Site is supported "if necessary" as stated in Policy HA4.

The above revisions to Policy HA4 are required to ensure that the policy meets the third test of soundness (Will the plan deliver?).

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	Yes
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy EA1 – Employment Allocations

The employment allocations EA1b and EA1c in Monmouth are endorsed. As set out in Monmouthshire County Council's Employment Land review (November 2022), Monmouth had very few vacant office and industrial properties on the market in 2022. Allocations EA1b and EA1c are therefore vital to ensuring that residents have access to employment opportunities in Monmouth.

Employment allocation EA1b (Poultry Units, Rockfield Road) is allocated for B1 uses and EA1c (Land North of Wonastow Road) is allocated for B1, B2 and B8 uses. Employment allocation EA1c is the only employment allocation in Monmouth in the RLDP for industrial uses and, given the identified lack of availability of this type of employment space in

Monmouth identified in the employment land review, it is essential that this employment allocation is included in the final version of the RLDP.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

**16. Do you have any comments on the community infrastructure and open space polices?
(Policies S15, CI1, CI2, CI3 &CI4)**

Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas

Policy CI2 states that *"new development proposals will be assessed against the Council's standards for formal outdoor open space, informal outdoor space, allotments and community growing as set out below:"*

Formal open space	*Open Space Typology*	*Quantity Guideline (hectares per 1,000 population)*
	Playing pitches	*1.2ha*
	All outdoor sports	*1.6ha*
	Equipped/designated play areas	*0.25ha*
	Other outdoor provision	*0.3ha*
	Sub total	*3.35ha*
Informal open space	*Parks and gardens*	*0.8ha*
	Amenity green space	*0.6ha*
	Natural and semi-natural space	*2.0ha*

	Sub total	*3.4ha*
Allotments & community growing	*Allotments & community growing*	*0.3ha*

The requirements for open space provision set out in Policy CI2 total 7.05ha per 1,000 population, which is considerably above the Field in Trust Standard of 5.35ha per 1,000 population. Furthermore, Policy CI2 does not allow consideration of existing open space provision. The Monmouthshire RLDP Open Space Study (October 2024) sets out how the settlements in Monmouthshire perform against the Field in Trust Standards. In the case of Monmouth, the Study identifies that there is a significant over provision of Playing Pitches, other Outdoor Provision, Amenity Greenspace and Natural and Semi-Natural open space in Monmouth. Policy CI2 also does not make allowance for development viability in the provision of open space which risks the deliverability of development and therefore fails to meet the third test of soundness (Will the plan deliver?). In the context of a 50% affordable housing policy requirement and a policy requirement for zero carbon homes (amongst others), it is essential that an allowance for viability, as well as consideration of the existing open space provision in settlements, is provided in Policy CI2.

The proposed amendments to Policy CI2 are therefore as follows:

"Subject to identified need, ~~N~~new development proposals will be assessed against the Field in Trust's~~the Council's~~ standards for formal outdoor space, informal outdoor space, allotments and community growing, as set out below:"

Formal open space	*Open Space Typology*	*Quantity Guideline (hectares per 1,000 population)*
	~~*Playing pitches*~~	~~*1.2ha*~~
	All outdoor sports	*1.6ha (including 1.2ha of sport pitches)*
	Equipped/designated play areas	*0.25ha*
	Other outdoor provision	*0.3ha*
	Sub total	*2.15ha*
Informal open space	*Parks and gardens*	*0.8ha*
	Amenity green space	*0.6ha*
	Natural and semi-natural space	*1.8ha*

	Sub total	*3.2ha*
~~*Allotments & community growing*~~	~~*Allotments & community growing*~~	~~*0.3ha*~~

(proposed amendments underlined and with strike through)

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	Yes
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. **Appendix 9 – Housing Trajectory** The housing trajectory at Appendix 9, which sets out the timing and phasing of the Deposit RLDP allocations is endorsed for Land at Leasbrook. [redacted] are in the process of preparing a planning application for the Land at Leasbrook site which will ensure that the delivery of the site can be progressed quickly once the RDLP is adopted.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): Whilst the broad principles of the Deposit RLDP are sounds, we consider that there are a number of amendments required to ensure that the Plan meets the third test of soundness and is deliverable. Please refer to the representations provided to individual policies/objectives above for the changes that need to be made to make the Plan sound.		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	Yes

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

Archived: 13 March 2025 10:00:29
From: [redacted]
Mail received time: Mon, 16 Dec 2024 21:09:07
Sent: Mon, 16 Dec 2024 21:05:02
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Representations on behalf of Redrow Homes: Monmouthshire Deposit RLDP - Dewstow
Importance: Normal
Sensitivity: None
Attachments:
24.12.16 Dewstow RLDP Deposit Representation-Form.pdf;

Dear Sir / Madam,

On behalf of our client Redrow Homes (South Wales) Ltd ("Redrow Homes"), please find attached representations to the Monmouthshire Deposit RLDP consultation in relation to the Dewstow residential land proposal.

We would be grateful if you could please confirm safe receipt of the attached.

Kind regards

[redacted]

[redacted]

Redrow Homes Limited

[redacted]

The contents of this email are subject to Redrow 's disclaimer.
Click here to read our disclaimer or here to read our Privacy Notice.

Dow nload the Redrow App today:

Office Use Only
Represent or Number…
……
……
……
…

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Redrow Homes (South Wales) Limited	Lichfields
Address:	[redacted]	
Telephone No:		[redacted]

Email:		

Office Use Only
Represent or Number…
……
……
……
……

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Objective 10 (Housing)

Objective 10 (Housing) states:

"To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents."

This objective is overwhelmingly focussed on affordable housing delivery. Whilst there is clearly a need for increased affordable housing provision this does not mean that the private market should be discounted altogether. Increased open market housing would enhance affordable housing delivery by ensuring that the private sector delivers considerable numbers of affordable homes through S106 agreements. Indeed, an appropriate mix of open market and affordable housing will enable Monmouthshire to meet its core purpose of building sustainable and resilient communities for all. This is emphasised by paragraph 4.2.1 of Planning Policy Wales which states that *"new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs, and contribute to the development of sustainable and cohesive communities."*

As such, Objective 10 should be amended so that it acknowledges the vital contribution that open market housing plays in overall housing delivery and affordable housing delivery. This amendment will ensure that Objective 10 meets the first test of soundness (Does the plan fit?).

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	yes

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S1 – Growth Strategy

Strategic Policy S1 states:

"In order to meet Monmouthshire's core purpose of building sustainable and resilient communities for all, between 2018 and 2033 the Plan will make provision for:

- *6,210* homes to meet a housing requirement of 5,400 homes.*
- *A minimum of 38ha of employment land (Use Classes B1, B2, B8).*

The focus of this growth will be on the County's most sustainable settlements, as outlined in the sustainable settlement hierarchy set out in Policy S2.

**This figure includes and indicative 15% flexibility allowance."*

It is noted that the flexibility allowance has increased from 10% in the first Preferred Strategy to 15% in the Deposit Plan and is in conformity with the growth aspirations for Monmouthshire put forward by the Welsh Government. However as set out below, it is considered that the identified housing requirement including 15% flexibility allowance set out in Policy S1 should be the absolute minimum that the RLDP commits to deliver.

As set out in the Local Housing Market Assessment (LHMA) Refresh 2022-2037, which forms part of the RLDP evidence base, as of January 2024 there were 3,704 households registered on Monmouthshire Council's common housing register, of which 2,064 have a recognised need. The number of households registered accounts for 9.0% of the total households in Monmouthshire (which was recorded as 40,922 in the 2021 Census).

It is noted that in the LHMA Refresh, the recorded completions from 2018/19 to 2023/24 are 2,220 units. Excluding the flexibility allowance, this leaves 3,180 dwellings to be delivered in the remainder of the Plan period to 2033. However, as of January 2024, the number of households on the common housing register exceeds this residual requirement by 116.5%. As the common housing register does not account for households who can afford to buy or rent on the open market, it is evident that the housing requirement is not sufficient to support the housing needs of Monmouthshire going forward. Even with the 15% flexibility allowance, the common housing register accounts for 92.8% of the residual requirement for the Plan period, without considering those who can afford to buy or rent in the open market sector.

As such, it is evident that the 15% flexibility allowance on Monmouthshire's housing requirement should be included in Policy S1 as an absolute minimum with a view to achieving and exceeding the minimum requirement which itself should be viewed as a floor to development rather than a ceiling. The inclusion of the 15% flexibility allowance as a minimum will ensure that Strategic Policy S1 achieves the third test of soundness (Will the plan deliver?).

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 - Spatial Distribution of Development, Settlement Hierarchy

The categorisation of Caldicot as a Tier 1 Primary Settlement in Strategic Policy S2 is endorsed, with the town boasting a good level of retail, education, health, cultural, sporting and public transport as evidenced in the Sustainable Settlement Appraisal. For the purposes of the Settlement hierarchy the Severnside area is treated as a single settlement, within this policy however it should be acknowledged that Caldicot is clearly the most sustainable location within the Severnside area and should therefore be the focus of new allocations.

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy NZ1 – Monmouthshire Net Zero Carbon Homes

Policy NZ1 states:

"All new build residential development will be required to demonstrate compliance with the standards outlined below through the submission of an appropriately detailed, RICS-aligned operational energy assessment with any planning application resulting in the creation of 1 or more dwellings. Development proposals for new homes must demonstrate the following:

- *Space heating demand less than 25 kWh/m²/yr;*
- *On-site renewable energy generation to deliver the greater of: - matching the annual regulated electricity demand of the development; or - generating at least 40 kWh/m²fp/yr.*
- *EPC A or equivalent in accordance with the current version of the National Calculation Methodology for assessing the energy performance of dwellings;*
- *New homes must not connect to the gas grid and all heating and hot water needs should be met by low carbon heating systems. No fossil fuel systems are to be used on-site;*
- *ULEV charging infrastructure must be provided to every dwelling.*

All developments must submit an as built performance survey following construction and prior to occupation of the home/s to demonstrate that they have been built to the applicable standards and minimise the 'performance gap.'

It is observed that the wording of Policy NZ1 requires "all new build residential developments" to demonstrate policy compliance. However, it is considered that it would not be possible to provide all of the information required to demonstrate compliance with Policy NZ1 at the outline planning application stage and that the information requirements for Policy NZ1 can only be expected to be provided at detailed (reserved matters) stage.

With regards to the requirement to demonstrate a space heating demand of less than 25 kWh/m^2/yr, it is considered that further information needs to be provided to developers on how the LPA intends to measure space heating demand as without detailed guidance it is

not possible to say whether this target is achievable or not. There needs to be clarity on where the measurement point begins (for example, if the guidance were to require developers to take the heating demand before the efficiency of an air source heat pump is factored into the heating load, then the efficiency of the heating pump could not be included in the calculation of demand).

In relation to the requirement for all new build residential developments to be rated EPC A or equivalent, we note that new build homes typically achieve an EPC rating of B as there are considerable cost implications associated with achieving EPC A that have to be considered in the context of all of the other demands that impact on development viability. It is therefore suggested that the EPC A requirement in Policy NZ1 be amended to EPC B to ensure that Policy NZ1 can deliver the homes Monmouthshire needs (i.e. the amendment is required to ensure Policy NZ1 meets the third test of soundness (Will the Plan deliver?)).

With regards to the requirement for ULEV charging infrastructure on every dwelling, it is considered that this could be removed from Policy NZ1 as this will be included in legislation following the upcoming amendments to Building Regulations as indicated in recent Welsh Government consultation. The removal of this requirement from the RLDP will ensure that there is no overlap with Building Regulations ensuring that Policy NZ1 achieves the third test of soundness (Is the Plan deliverable?).

In relation to the submission of built performance survey, whilst in principle the initiative to reduce the gap between design and 'as built' performance, there are concerns that an initiative to give preferential branding or certification to homes that *were* tested may negatively impact the marketing of homes that are not tested. As with the measurement of space heating demand above, guidance is required on what the LPA is expecting.

Finally, there must be some flexibility introduced for the requirements of Policy NZ1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy NZ1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes Monmouthshire needs could be compromised.

As such, Policy NZ1 should be amended as suggested above to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Yes
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S6 – Infrastructure

Policy S6 states:

"…In the event that viability considerations indicate that not all the identified contributions can be reasonably required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of residential developments, priority will be given to the affordable housing requirement set out in Policy S7 unless there is an overwhelming need for the contribution, in whole or in part, to be allocated for other necessary purpose/s."

The consideration of viability that is given in Policy S6 is endorsed and is consistent with PPW 4.2.21 which states:

"Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits which are reasonably

related in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site's delivery."

It is therefore considered that Policy S6 meets the tests of soundness.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy H8 – Housing Mix

Policy H8 requires development proposals of 10 or more new homes to be accompanied by a statement setting out how the mix of market housing will assist in achieving balanced communities, including the site allocations included within the RLDP.

The LDP seeks a high proportion of affordable homes as well as ambitious policies for net zero carbon homes. If these policies are going to be met it is essential that the mix of dwellings on the open market element is of a sufficient value to make the Council's policy aspirations deliverable. The Council needs to ensure that it does not undermine site viability by being overly prescriptive on dwelling mix and as such, it is considered that Policy H8 be deleted from the RLDP.

Policy S7 - Affordable Housing

Policy S7 requires on-site provision of 50% affordable homes on all new site allocations and sites of 20 homes and over within existing settlement boundaries. Whilst it is understood that it is a core RLDP objective to deliver much needed affordable homes in Monmouthshire, Policy S7 must allow for viability to be considered.

To not do so could jeopardise the delivery of entire allocations which could result in a reduction in the delivery of market and affordable housing across the primary settlements in Monmouthshire. The non-delivery of even a few residential allocations would result in

Monmouthshire not meeting its housing needs for the Plan period and would diminish the overall output of affordable housing.

It is noted that the Council has ambitious policies for both affordable housing and net zero homes. In working towards delivery of these it will be necessary to carefully consider site viability and there must be some flexibility in both Policy S7 and H8 to ensure that necessary new homes are built.

The blanket approach to the 50% affordable housing requirement across site allocations fails to take into account the unique technical complexities of each individual allocation that are required to be overcome before sites can be delivered. This is in direct contrast to PPW paragraph 4.2.32 which states that:

"When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable." (Lichfields emphasis)

To ensure that Policy S7 complies with national policy and does not risk the delivery of market and affordable housing on allocated and large sites, the Policy should be amended as follows:

"The affordable homes target for the Plan period of 2018 – 2033 is 1,595 – 2,000 homes. This will be delivered in accordance with the following framework:

i) New site allocations – On-site provision of 50% affordable homes (subject to viability) on all new site allocations.

ii) Sites of 20 homes and over – On-site provision of 50% affordable housing (subject to viability) applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iii) Sites of 5 to 19 homes – On-site provision of 40% affordable housing (subject to viability) applies to development proposals on sites within existing settlement boundaries as identified in Tiers 1-3 of Strategic Policy S2.

iv) Sites of 1 to 4 homes – Financial contributions towards the provision of affordable housing (subject to viability) in the local planning authority area will be required in accordance with details set out in the Affordable Housing Supplementary Planning Guidance.

v) Conversions and sub-divisions – Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details set out in Affordable Housing Supplementary Planning Guidance.

In determining how many affordable homes should be provided on a development site, the figure resulting from applying the proportion required to the total number of dwellings will be rounded to the nearest whole number, where half rounds up.

All proposals must meet national policy guidance in relation to the most efficient use of land and should not be subdivided or phased in an attempt to avoid on-site provision of affordable homes.

This Strategic Policy applies to all residential planning applications. Exceptions will not be made for sites that previously had planning permission and have been resubmitted."

Without the above amendments and consideration of viability, it is considered that Policy S7 fails to achieve each of the three tests of soundness.

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy HA2- Land to the east of Caldicot / North of Portskewett

The tier-table in Strategic Policy S2 allocates an indicative number of homes for Caldicot of 2,190 across the Severnside area (including the 15% flexibility allowance) which accounts for 35% of the distribution of the proposed homes across Monmouthshire during the RLDP period. The 2,190 dwellings in Severnside includes the allocation of 810 dwellings for Caldicot with the balance of 1,380 from existing commitments across the rest of Severnside. Whilst 35% of the LDP's dwelling supply is identified as being in Severnside only 13% is in Caldicot, a settlement with the full range of services. Of the new 810 dwellings allocated in Caldicot, 770 (95%) are on a single site - Land East of Caldicot. The over concentration of new allocations in this one site risks the ability of the Severnside settlement to deliver the new homes required in this part of the County.

Redrow Homes consider that the housing needs of the Severnside area would be better met if there was an additional major housing allocation made at Caldicot. This would reduce the overreliance on Land East of Caldicot and ensure that essential new housing will be delivered should that draft allocation not come forward or not come forward quickly. A second major allocation would provide much needed flexibility to the RLDP.

Land has been proposed for allocation in the RLDP east of Caldicot for 770 homes on land owned (at least in part) within the public sector and currently includes existing uses. It is unclear how quickly this proposal could come forward and whether there are any deliverability issues. Redrow propose that the residential land proposal HA2 is not the most sustainable location in and around Caldicot and that the site put forward by Redrow Homes is better located and can deliver a similar number of new homes with similar supporting social and physical infrastructure. The Dewstow land is also readily available, in the hands of a developer and could be brought forward early in the plan period.

Proposed allocation HA2 is segregated from Caldicot by an extensive area of parkland which is also flood plain. The location is divorced from Caldicot and all the facilities therein as both vehicular traffic and pedestrians will need to venture down the B4245 which although now has a footpath it is a long and isolated route not conducive to walking. An alternative walking route exists via the country park but that is often inaccessible due to frequent flooding.

The proposed new development proposal at HA2 takes residential far away from the existing built-up area and the local community facilities, shops, and significantly the railway station. Redrows proposed development at Dewstow however is adjacent to the existing town and well connected despite the presence of the M48. The M48 may be perceived as a barrier but does not feel like that on the ground. The road is in a cutting and thus unobtrusive. It is no more of a barrier than the A465 adjacent to Abergavenny where the HA1 allocation is proposed in this same RLDP. HA2 is unarguably more spatially segregated from Caldicot due to the flood zone and the space that flood zone requires separating the new development from the existing. There is no such physical segregation between Redrows Dewstow site and Caldicot.

Both proposals are of a similar scale and can provide similar new community infrastructure. Dewstow is however better placed to utilise existing community infrastructure due to its proximity to existing facilities in Caldicot. Shops and primary schools are close by and easily accessible by foot and the Dewstow site is significantly closer to the Caldicot railway station than HA2; in line with PPW.

Redrow proposes that the Dewstow land is a more sustainable location than the proposed allocation and can provide a development of similar size and including similar social, community and green infrastructure.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	Yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Land has been allocated for employment at Oak Grove Farm in Caldicot. This allocation EA1e is for 6 ha of B1, B2 and B8. This allocation is on the northern fringe of the residential allocation HA2. It is considered that this allocation for employment uses is too small as proposed especially with the site being so divorced from the existing cluster of businesses on employment land south of HA2. Redrow propose that the employment land for Caldicot could be better located on land comprising the southern area of the proposed residential allocation – Land to east of Caldicot. This land has a better relationship to the existing employment facilities. In addition, there is potential for an increased area of land for employment uses in this area where the business park is already thriving, and its expansion could be favourable.

The lost residential land at HA4 could be replaced on the Redrows Dewstow land to the north of the Caldicot.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	yes

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas

Policy CI2 states that *"new development proposals will be assessed against the Council's standards for formal outdoor open space, informal outdoor space, allotments and community growing as set out below:"*

Formal open space	*Open Space Typology*	*Quantity Guideline (hectares per 1,000 population)*
	Playing pitches	*1.2ha*
	All outdoor sports	*1.6ha*
	Equipped/designated play areas	*0.25ha*
	Other outdoor provision	*0.3ha*
	Sub total	*3.35ha*
Informal open space	*Parks and gardens*	*0.8ha*
	Amenity green space	*0.6ha*
	Natural and semi-natural space	*2.0ha*
	Sub total	*3.4ha*
Allotments & community growing	*Allotments & community growing*	*0.3ha*

The requirements for open space provision set out in Policy CI2 total 7.05ha per 1,000 population, which is considerably above the Field in Trust Standard of 5.35ha per 1,000 population. Furthermore, Policy CI2 does not allow consideration of existing open space provision. The Monmouthshire RLDP Open Space Study (October 2024) sets out how the settlements in Monmouthshire perform against the Field in Trust Standards. In the case of Caldicot the Study identifies that there is a surplus of Playing Pitches, other Outdoor Provision, Amenity Greenspace. Policy CI2 also does not make allowance for development viability in the provision of open space which risks the deliverability of development and therefore fails to meet the third test of soundness (Will the plan deliver?). In the context of

a 50% affordable housing policy requirement and a policy requirement for zero carbon homes (amongst others), it is essential that an allowance for viability, as well as consideration of the existing open space provision in settlements, is provided in Policy CI2.

The proposed amendments to Policy CI2 are therefore as follows:

"Subject to identified need, ~~N~~new development proposals will be assessed against the Field in Trust's~~the Council's~~ standards for formal outdoor space, informal outdoor space, allotments and community growing, as set out below:"

Formal open space	*Open Space Typology*	*Quantity Guideline (hectares per 1,000 population)*
	~~*Playing pitches*~~	~~*1.2ha*~~
	All outdoor sports	*1.6ha (including 1.2ha of sport pitches)*
	Equipped/designated play areas	*0.25ha*
	Other outdoor provision	*0.3ha*
	Sub total	*2.15ha*
Informal open space	*Parks and gardens*	*0.8ha*
	Amenity green space	*0.6ha*
	Natural and semi-natural space	*1.8ha*
	Sub total	*3.2ha*
~~*Allotments & community growing*~~	~~*Allotments & community growing*~~	~~*0.3ha*~~

(proposed amendments underlined and with strike through)

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	yes
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Redrow Homes (South Wales) Ltd have been promoting the land at Dewstow for some time and can advise that the land is under contract and readily available for development. If the land becomes allocated then a planning application for the site can be swiftly prepared and submitted which will ensure that the delivery of the site can be progressed quickly once the RDLP is adopted.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	X
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		Fails Test 3: Will the Plan deliver (is it likely to be effective)? X

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

Whilst the broad principles of the Deposit RLDP are sounds, we consider that there are a number of amendments required to ensure that the Plan meets the third test of soundness and is deliverable. Please refer to the representations provided to individual policies/objectives above for the changes that need to be made to make the Plan sound.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	Yes

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Replacement Local Development Plan
2018-2033

monmouthshire
sir fynwy

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1519

Barratt David Wilson Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Barratt David Wilson Homes	Savills
Address:		[redacted]
Telephone No:		
Email:		

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	X
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Barratt David Wilson Homes (BDWH) provided comments as part of both consultations on the Preferred Strategy in connection to the RLDP's Growth Strategy and the representation to the January 2023 Preferred Strategy is included as Appendix A to these completed forms. Those comments centred on the fact that Growth Option 1 (which was effectively the continuation of the growth strategy presented in the 2021 version of the Preferred Strategy) should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (September 2022). Whilst it is recognised that Welsh Government raised a non-conformity objection to the Use of Growth Option 1, instead requiring the selection of Growth Option 2. BDWH's position continues to be that it is unsound to select a growth option that performs less well in the analysis contained within the Growth and Spatial Options Paper September 2022 than other growth options that were considered but dismissed.		

BDWH's comments at that stage also suggested that, if Growth Option 2 were to be used (this being the option presented in the 2023 version of the Preferred Strategy and carried forward in the Deposit RLDP) then it needs to be uplifted to reflect:

- The increased level of net inflow from nearby English authorities in recent years, rather than making an assumption of an average inflow from these authorities over a far longer period of time; and
- The divergence between the 2018-based household projections and the 2021 Census actual number of households. If this were to be extrapolated over the RLDP plan period, this could represent a significant under estimation of growth in households.

This is a sound and evidence-based approach and one which the Development Plans Manual allows for.

BDWH also commented that the flexibility allowance should be increased from the 10% figure presented at Preferred Strategy stage and, in that sense, it is positive to see that the Deposit proposes that this is increased to 15%. The use of flexibility allowances in excess of 10% has recently been established in the cases of both the Bridgend RLDP (which incorporates a 14% flexibility allowance) and Merthyr Tydfil (which incorporates a 25% flexibility allowance) whilst the Neath Port Talbot Preferred Strategy incorporates a 20% flexibility allwoance. That said, BDWH continue to have concerns that even this figure is inadequate based on the under delivery over the adopted LDP plan period where the 2022 Annual Monitoring Report's recognised that only 66% of homes planned for had been delivered. The Development Plans Manual allows for the use of a bespoke flexibility allowance if properly evidenced and BDWH suggest that the shortfall in housing delivery over the ALDP plan period provides that justification for the incorporation of a higher flexibility allowance. Whilst it is recognised that a flexibility allowance of 34% is probably unrealistic, a flexibility allowance of 20% that sits between the Bridgend and Merthyr Tydfil examples seems appropriate.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

As with Policy S1, BDWH commented on Policy S2 in responses to both consultations on the Preferred Strategy. These comments centred on:

- The appropriateness of directing a significant proportion of the Secondary Settlement growth towards Penperlleni given the record of delivering homes within the settlement and the constrained nature of the other Secondary Settlements;
- The need for the RLDP to re-balance so that a greater proportion of homes are directed towards the Secondary Settlements rather than the Rural Settlements; and
- The assumptions made with regards to some of the allowances, the assumed delivery rates of the proposed strategic sites, and the assumptions around existing commitments.

On the first point, the Deposit RLDP does direct a degree of growth to Penperlleni and this is similar to that of Raglan and Usk. BDWH continue to suggest that a greater proportion of new homes should be directed to Penperlleni than either Raglan or Usk given its lack of constraint and the proven history of delivery of allocated sites.

With regards to the second point, where the Preferred Strategy previously sought to direct 380 homes to the Secondary Settlements and 504 homes to the Rural Settlements, the Deposit RLDP further increases this imbalance by seeking to direct 350 homes to the Secondary Settlements and 556 homes to the Rural Settlements.

BDWH question the fundamental soundness of a spatial approach which looks to direct a greater number of homes towards the third and fourth tiers of the settlement hierarchy than the second tier of the settlement hierarchy. Given that the spatial strategy is in turn informed by the Sustainable Settlement Appraisal (December 2022) which effectively ranks all settlements based on their sustainability, the effect is that the RLDP is directing a higher proportion of new homes to quantifiably less sustainable locations.

Whilst it may be the case that an element of housing need is to be directed towards the Rural Settlements, BDWH suggest that the spatial strategy needs to be adjusted to direct a greater proportion of new homes towards the Secondary Settlements.

On the third point, BDWH continue to have concerns with the various components that are assumed to make up the housing supply as currently shown in Table 2 of the Deposit RLDP (and expanded upon in the Housing Background Paper). Again, the representations at Preferred Strategy stage remain entirely relevant but the key points are as follows:

- The amount of homes forecast to come forward through small sites and windfall sites will not be as great as forecast in the Housing Background Paper. This is because the assumptions in the Urban Capacity Study are unrealistic, as is the use of a continuation of historic delivery rates;
- The identified strategic sites in Abergavenny and Caldicot will not deliver at the rate forecast. BDWH comment further on this in connection to Question 10; and
- The assumptions made with regards to existing commitments is unrealistic and fails to make appropriate allowance for non-delivery.

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?		

(Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

10. Do you have any comments on the residential site allocations?

(Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy HA1 - Land to the East of Abergavenny and Policy HA2 - Land to the East of Caldicot/North of Portskewett

BDWH have commented as part of the 2023 Preferred Strategy around the assumed delivery rates of the Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett strategic sites.

There are two core bits of evidence that can be used to provide a forecast of the likely yield that a site will deliver in a plan period. One is the 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver' paper prepared by Lichfields (Appendix B) which looks at a large sample of sites across England and Wales whilst the other is the experience of the timescales associated with the delivery and delivery rates of strategic site allocations in the adopted LDP.

Together, both suggest that the timescales associated with the delivery of larger strategic sites of this scale is often greater than anticipated. This is due to the time associated with securing planning permission, the time required to deliver both the onsite and offsite infrastructure that is required before a single property is delivered (this is certainly the case given the scale and location of both sites as well as the upfront infrastructure requirements identified in the Infrastructure Delivery Plan at Appendix 8 of the Deposit RLDP), and the number of homes that are delivered annually after first completion.

From analysing the Lichfield's Paper and experience of delivery from the ALDP, the below table provides a more realistic expectation as to how many homes would be delivered over the RLDP plan period.

Site	First Completion	Annul Delivery	Total in Plan Period
Land to the East of Abergavenny	2028/2029	70	330
Land to the East of Caldicot/North of Portskewett	2030/2031	100	375

In reality, the timescales for the delivery of the first homes on these sites are likely to be greater and the delivery rates lower when compared to the findings of the Lichfields Report or the past experience from the adopted LDP because:

- The strategic sites identified in the RLDP are that much larger than in the adopted LDP such that they are of limited utility as examples;
- Whilst presumably agreements are already in place between landowners, both sites are under fragmented rather than single ownerships meaning the decision making process around planning and disposal is likely to elongated; and
- Neither site is being promoted by housebuilders. The Abergavenny East site is being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes whilst Caldicot East is being promoted by a land promoter (rather than a developer) and the local authority.

BDWH's position is that the number of homes assumed to be delivered across these two sites in the RLDP plan period is too great and that the spatial strategy needs to be amended to reflect this with the reduction in the number of homes assumed to come forward from these site met elsewhere.

Policy HA12- Land West of Trem yr Ysgol, Penperlleni

BDWH are concerned with the way that the site that they are promoting (CS0279 Land West of Usk Road, Penperlleni) has been considered as part of the candidate site assessment process and therefore in turn suggest that the intention to allocate the Land West of Trem yr Ysgol, Penperlleni site under Policy HA12 may be unsound because of this. This is commented on further in response to Question 18.

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

BDWH are concerned with the way that the site that they are promoting (CS0279 Land West of Usk Road, Penperlleni) has been considered as part of the candidate site assessment process, with the site being unduly dismissed. The implications of this could be that:

- The proposed allocation of the Land West of Trem yr Ysgol, Penperlleni site under Policy HA12 is unsound as an inadequate assessment of the CS0279 Land West of Usk Road, Penperlleni site (as an alternative of the same scale) has been undertaken; and
- The CS0279 Land West of Usk Road, Penperlleni site would not be considered as a reserve or substitute site if allocations were needed to be made.

From our review, all candidate sites have been assessed through the Candidate Sites High-Level Assessment (as amended) July 2023, the Initial Consultation Report: Preferred Strategy and Candidate Sites Register October 2024, and the Candidate Site Assessment Report 2024. CS0279 Land West of Usk Road, Penperlleni passed the July 2023 assessment but failed the October 2024 assessment for the following reason:

> *'(the) Site is not progressing to the Deposit Plan as there are significant landscape concerns in relation to developing west of the A4042 which would significantly change Penperlleni's settlement pattern and valued landscape. There are also concerns regarding connectivity to facilities in the settlement due to the location on the opposite side of the A4042. Overall, there are considered to be more suitable alternative sites in the area and, therefore, the site will not be allocated in the RLDP.'*

BDWH submitted a comprehensive package of documentation as part of the Stage 2 Call for Sites in Summer 2021. This included a package of technical and environmental documents that covered matters relating to connectivity, landscape, and settlement pattern. The core conclusions from these assessments are repeated below:

Landscape

With regards to landscaping matters, a Landscape and Visual Appraisal was submitted by RPS and is included as Appendix C. Initially the Landscape and Visual Appraisal recognises that the development of an edge of settlement site such as this will inevitably have a permanent and almost certainly negative landscape impact to some degree. In terms of the landscape effect, the development is considered to have a "moderate adverse" effect, reflecting that the site itself only forms a modest part of the wider Landscape character area and is the portion that is closest to the built edge of Penperlleni. This is the same for the other

candidate sites within Penperlleni which, due to the lack of previously developed land within the town, are all located on the settlement's fringe.

To assess the visual impact of the development, the visibility of the site has been considered from seven representative viewpoints. Due to the site being adjacent to built development within Penperlleni, views to the proposed development from more distant views from the surrounding landscape would be seen as a small addition to the existing residential development. Where there is an adverse effect from certain viewpoints, this is "moderate" at worst (and is more frequently "minor" or "negligible") and is reduced further as planting shown in the Opportunities and Concept Plan along the site's boundaries matures over time.

The Appraisal recommends a series of mitigation measures which are incorporated into the Opportunities and Concept Plan. These include the creation of buffers and retention and strengthening of planting along the site's western, northern, and southern boundaries, the creation of a green corridor through the site, the provision of areas of public open space, and a landscaped gateway entering the site.

Transport and Connectivity

Submitted as part of the Stage 2 Call for Sites was a Transport Appraisal prepared by Lime Transport (included at Appendix D) which contains an evaluation of the impact of the additional vehicle movements associated with the development on the local highways network and the suitability of the proposed access.

The Transport Appraisal confirms that there has been extensive discussion with Welsh Government with regards to securing access from the A4042. This has confirmed the principle of securing an access from the A4042 and has informed the engineering arrangement presented in the Transport Statement which achieves the required visibility splays and forward visibility.

The Transport Appraisal indicates a requirement for the provision of an informal crossing with dropped kerbs and tactile paving across Usk Road to connect the site to the services within Penperlleni. The justification for the use of an informal crossing is set out in more detail in the Transport Appraisal but centres on the existing traffic flows, the low vehicle speed, and the long visibility splays in both directions. The proposed pedestrian crossing will also encourage future residents of the proposed development to walk to local facilities and public transport services and integrate the development with the existing settlement.

Settlement Form

Development of the CS0279 Land West of Usk Road, Penperlleni would be on the western side of the A4042. This is undisputable but, from a landscape perspective, has been confirmed as acceptable in the Landscape and Visual Appraisal undertaken by RPS. There are already a number of properties on the western side of the A4042 which the development would relate to whilst the proposed pedestrian connection ensures a perception of connection.

At Preferred Strategy stage, BDWH also made the point that, by its very nature, any new development on the edge of a settlement extends a settlement's shape in one direction or another. In the case of the Land West of Usk site, this extension is visually well related to Penperlleni and very close to the services within the village's core whilst the Land West of

Trem yr Ysgol site results in ribbon development, further extending Penperlleni southwards along the A4042.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	X
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?	X	
Fails Test 3: Will the Plan deliver (is it likely to be effective)?	X	

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

BDWH's position is that, at present, the Deposit RLDP is not sound. There are a number of factors that lead to this conclusion, centring around the Growth Strategy selected, the spatial strategy selected and balance between the proportion of growth directed to new settlements, the assumed delivery rates of two of the proposed strategic sites, and the candidate site assessment process that has been undertaken in Penperlleni.

With regards to the final point (and BDWH's response to Question 18), there is a concern that an unsound approach has been taken which proposes to allocate one site in Penperlleni without due and balanced assessment of the site that BDWH is promoting to the west of Usk Road as an alternative. As set out above, BDWH's position is that the Land West of Usk site has been incorrectly dismissed as part of the candidate site assessment process and that it represents the most appropriate option for development within the settlement.

It is recognised that, if BDWH's comments in response to Questions 2, 3, and 10 are not incorporated, the RLDP is only likely to make allocations for circa 40 homes in Penperlleni. Whilst the latest Opportunities and Concept Plan (ref. 0711-1001-V2) submitted as part of the 2023 Preferred Strategy consultation showed the site delivering 85 homes, the developable area of the site can be adjusted to circa 40 homes by focussing built development closer to the A4042 and Park Y Brain Lane. The other advantage of such an

approach is that it allows for a lower density development and the lowering of density closer to the development's edge, as the further strengthening of the site's landscaped boundaries.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

INSIGHT
MARCH 2024

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION



LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk



Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). As we approach a general election, and with no end to the housing crisis, the boosting of housing delivery to achieve 300,000 homes per annum through a new generation of Local Plans (prepared under the Levelling Up and Regeneration Act) faces renewed focus. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites, which – with our enlarged sample – now considers real-world implementation across 179 sites of over 500 dwellings.

We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.
2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and increased mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a price consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 - 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.

Key figures

297 sites assessed, with a combined yield of 387k+ dwellings; 179 of the sites delivering 500+ dwellings

9 solely apartment schemes in urban areas assessed, with a combined yield of 5,300+ units

6.7 median years from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings

100-188 dpa average annual build-out rate range for schemes of 2,000+ dwellings[1]

44-83 dpa average annual build-out rate range for scheme of 500-999 dwellings[2]

34% quicker[3] to deliver greenfield sites of 500 or more units than their brownfield counterparts

69 dpa average completion per outlet on sites with one outlet, dropping to 62 dpa for two outlets, and 55 dpa for three outlets

3x longer planning to delivery periods for brownfield apartment schemes of 500-999 units compared to their conventional housing counterparts

[1] Range is from the lower quartile to upper quartile figures

[2] As above

[3] This is based on the median metric

01
Introduction

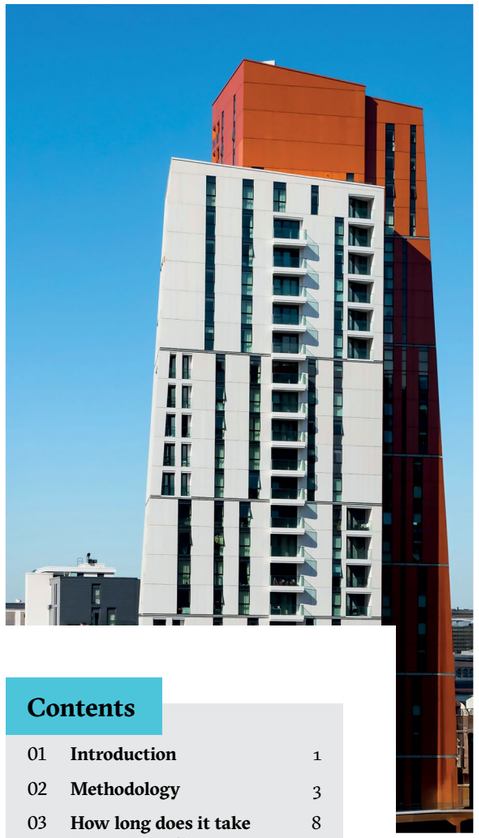
This is the third edition of Lichfields' award winning[4] research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data[5] where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform[6] including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out[7]. As of 2024, the business models of housebuilders and land promoters - and allegations of perceived 'land banking' – have received fresh examination by the Competition and Markets Authority (CMA) which published its Market Study in February 2024[8]. The CMA found that land banking is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



© Benjamin Cheng via Unsplash

Contents

01	**Introduction**	1
02	**Methodology**	3
03	**How long does it take to get started?**	8
04	**How quickly do sites build out?**	12
05	**What factors can influence build-out rates?**	15
06	**Delivery of brownfield, urban apartment schemes**	21
07	**Conclusions**	25

[4] The first edition was the winner of the 2017 RTPI Planning Consultancy Research Award

[5] Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

[6] Leading in due course to the August 2020 Planning White Paper: Planning for the Future

[7] Published October 2018

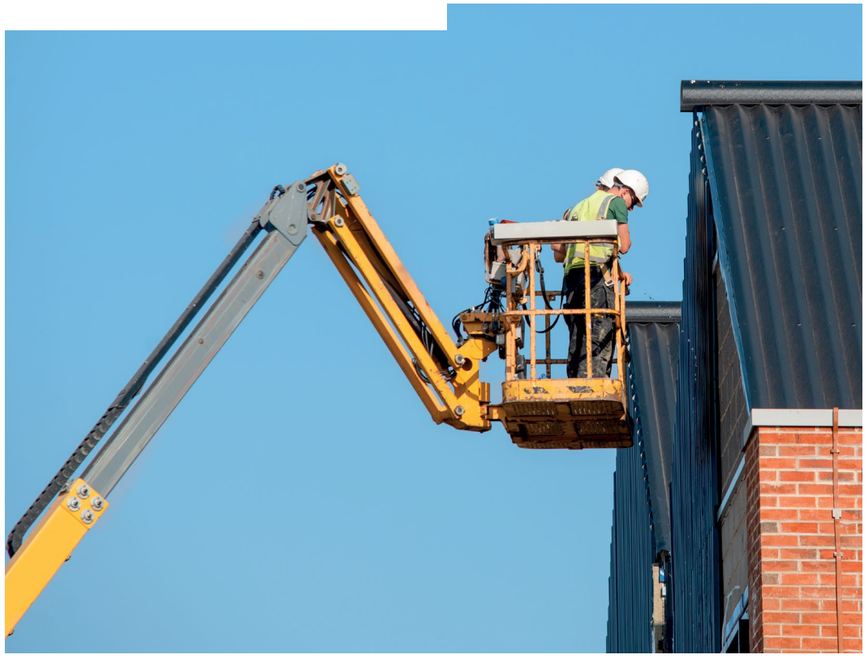
[8] https://assets.publishing.service.gov.uk/media/65d8baed6efa8300ldddcc5cd/Housebuilding_market_study_final_report.pdf

The Levelling Up and Regeneration Act ('LURA')[9] introduced new measures aimed at build-out via the use of Commencement Notices (s111), Progress Reports (s114) and Completion Notices (s112). Regulations to determine the practicalities of these measures are awaited[10] but their design and application will benefit from a sound evidence-based grasp of how strategic housing schemes are implemented.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories. This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. Recent policy shifts – increasing the focus on boosting housing supply on previously-developed sites[11] – mean it will become more important to understand the distinctive delivery profile of such schemes.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



[9] https://www.legislation.gov.uk/ukpga/2023/55/enacted

[10] The provisions require secondary legislation which, at the time of writing, has not been published and for which there is no timetable. There is also no guarantee the provisions will ever come into force. Albeit the provisions for making these regulations will come in to force on 31st March and the intentions were set out at the time the Bill was published in the supporting Further Information paper.

[11] Including the December 2023 changes to the NPPF, which clarify that the 35% uplift to the Standard Method in the 20 largest urban centres is expected to be delivered in those areas rather than in surrounding areas. In February 2024, the Secretary of State published the review into the London Plan and issued a consultation on 'Strengthening planning policy for brownfield development': https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development

INSIGHT
START TO FINISH

02
Methodology

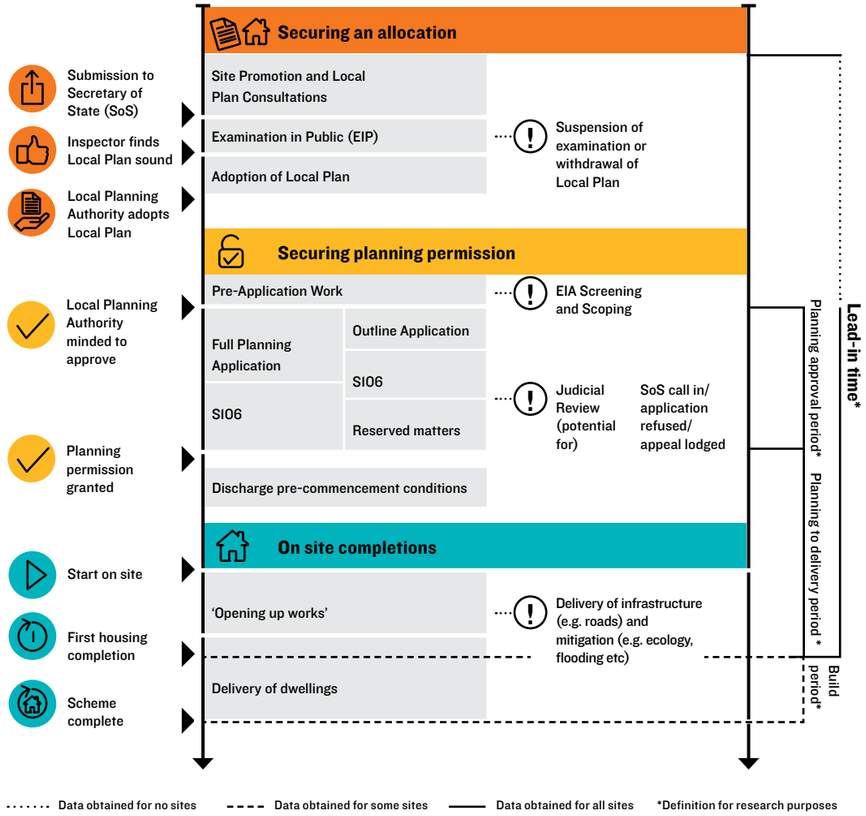
This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

Definitions

For all sites, we look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.I: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.

Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.



Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.

The sources on which we have relied to secure delivery data on all sites in this research include:

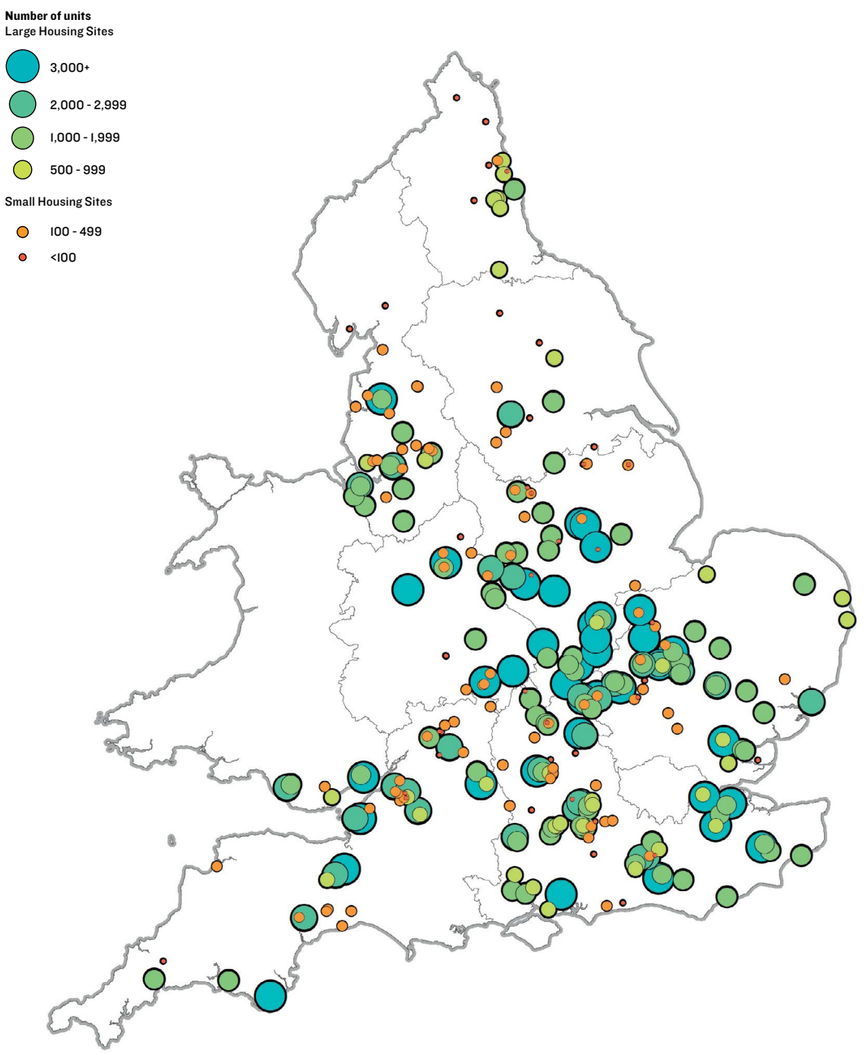
1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs[12];
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.



[12] Monitoring documents, five-year land supply reports, housing trajectories (some in land availably assessments), housing development reports and newsletters

INSIGHT
START TO FINISH

Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

03
How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

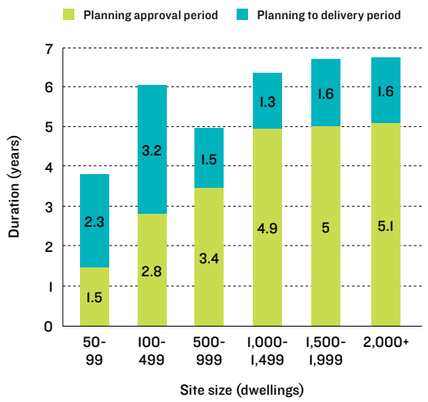
The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/ hybrid application). Our data shows that the average median planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis into the length of time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

Table 3.1 Lower quartile, median and upper quartile planning approval period (years) by site size

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.1
Median	1.5	2.8	3.4	4.9	5.0	5.1
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

The CMA go on to say in footnote 111 that *"in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years"*. This is more closely aligned to our findings on securing planning permission on a large site.

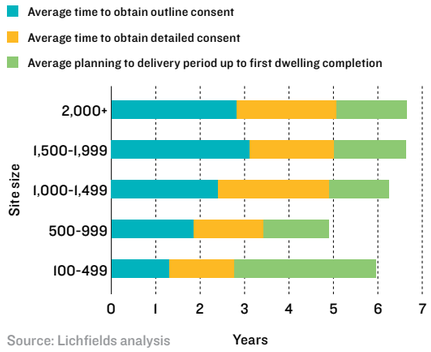
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the NPPF[13] which raised the bar on the definition of 'deliverable' for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the 'clear evidence' required to demonstrate deliverability of sites that do not benefit from a detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 - 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will on average deliver limited amounts of housing within the next five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site[14]. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

[13] February 2019

[14] CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

INSIGHT
START TO FINISH

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 - 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

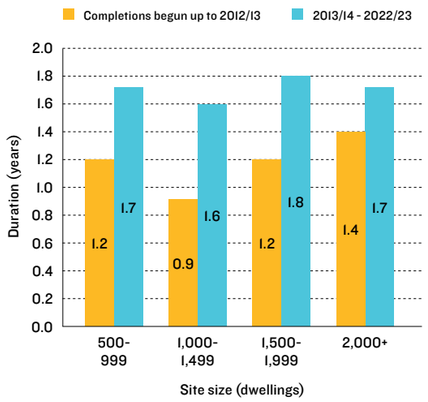
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research[15] provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 – 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF, the planning to delivery period has extended up to 1.6 - 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year period. Interestingly, sites of 100 - 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 - 7 years, despite significant variation in site size.

After this period, an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4).



[15] Lichfields, 2021 Tracking Progress

INSIGHT
START TO FINISH

04
How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries. Whilst the pressure on LPAs to maintain a five (or four[16]) year housing land supply may be decreasing[17], the LURA contains measures that will increase scrutiny of build-out rates at the planning application stage, with the potential (at least in theory) for Completion Notices that nullify permissions when sites fall behind from their agreed delivery pace. A good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520-620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet[18], the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement[19])	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

[16] See NPPF paragraph 226

[17] See NPPF paragraph 76

[18] Ebbsfleet has delivered a series of high annual build-out rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

[19] The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

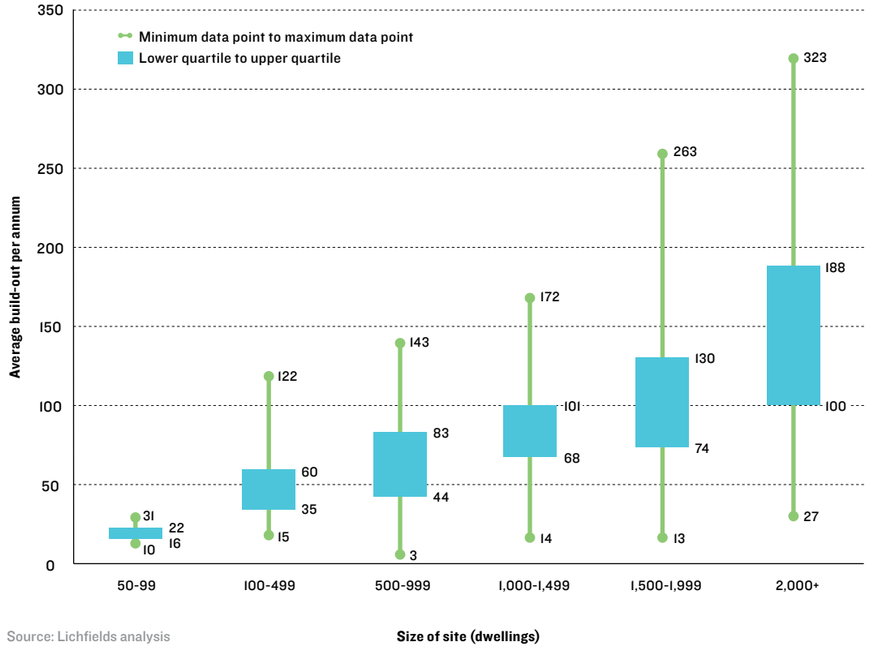
In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

100-188 dpa

average annual build-out rate on 2,000+ dwelling scheme

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

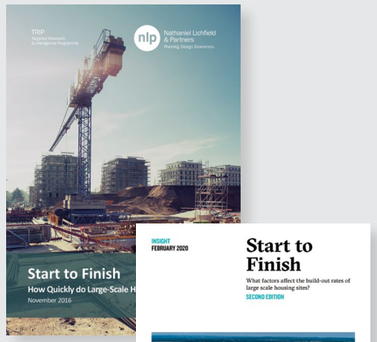


Table 4.2 Average build-out rates by size of site (dwellings) comparred with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

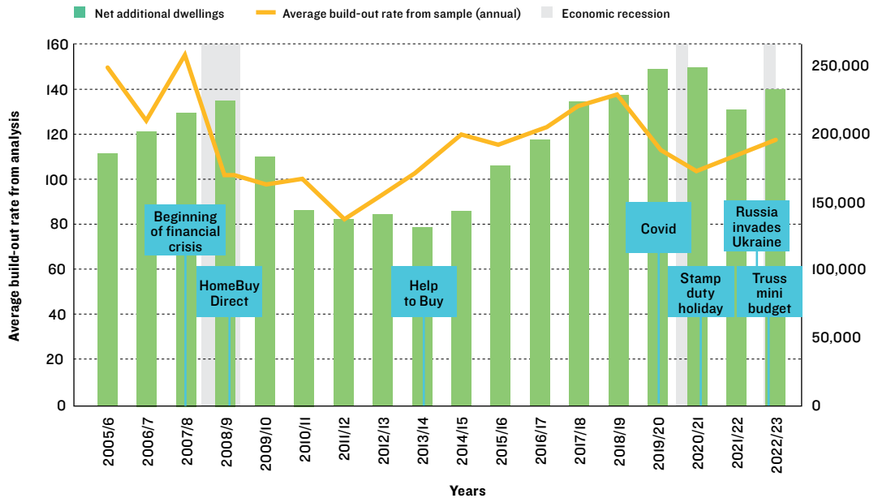
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period[20]. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.I: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table 104

[20] https://www.gov.uk/government/statistics/help-to-buy-equityloan-scheme-data-to-30-september-2021/help-to-buy-equity-loanscheme-data-to-30-september-2021#aboutthe-help-to-buy-equityloan-scheme

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) *"over half the impact from two years of interest rate increases is still to be felt"*. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF 'A New Normal for Housebuilding' forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025[21].

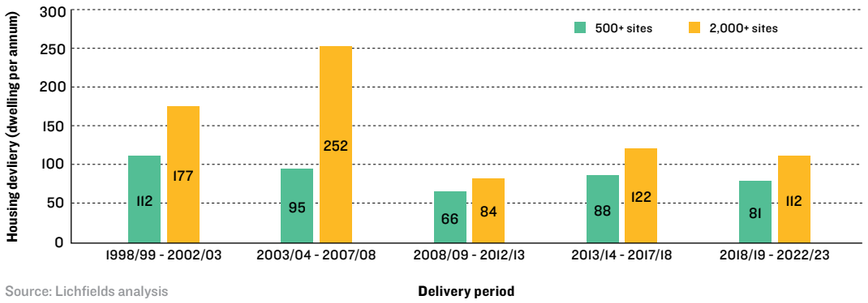
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

[21] https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024

Site specific factors

Do homes get delivered faster in high pressure areas?

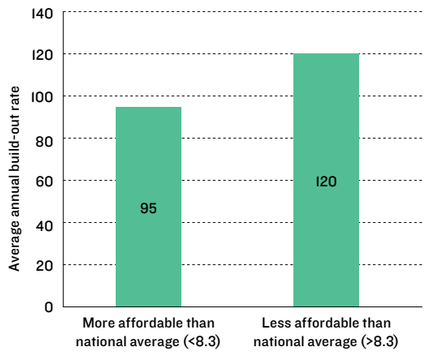
The rate at which homes can be sold (the 'absorption rate') determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government's standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas[22].

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved[23].



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordbaility ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

[22] This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were 'more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were 'less affordable than the national average (>8.72) at 126 dpa

[23] Using ONS long term affordability data https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022#:~:text=In%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings

34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Housing mix and variety

The Letwin Review[24] posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build-out. It concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10- 19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

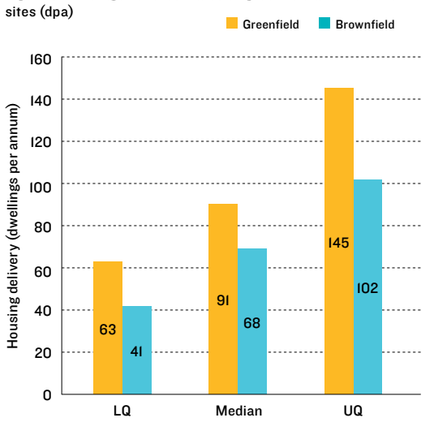
Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

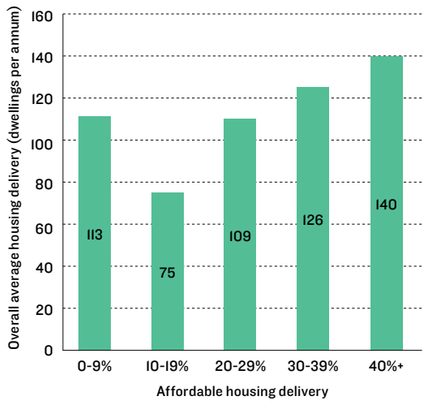
Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



Source: Lichfields analysis

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	**73**	**353**	**409**	**22**	**35**	**178**

Source: Lichfields analysis

[24] https://www.gov.uk/government/publications/independent-review-ofbuild-out-final-report

[25] https://www.gov.uk/government/publications/independent-review-of-build-out-final-report

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis

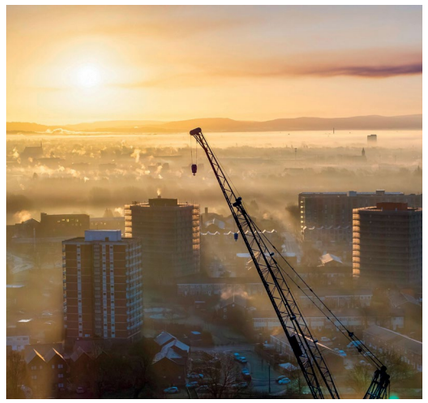
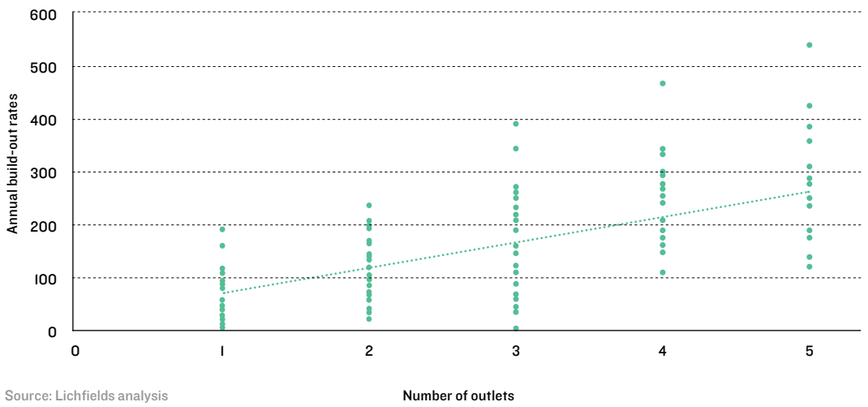


Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

06
Delivery of brownfield, urban apartment schemes

Government policy is seeking to increase the emphasis on brownfield residential development, and higher density, apartment schemes are likely to be a consequence. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

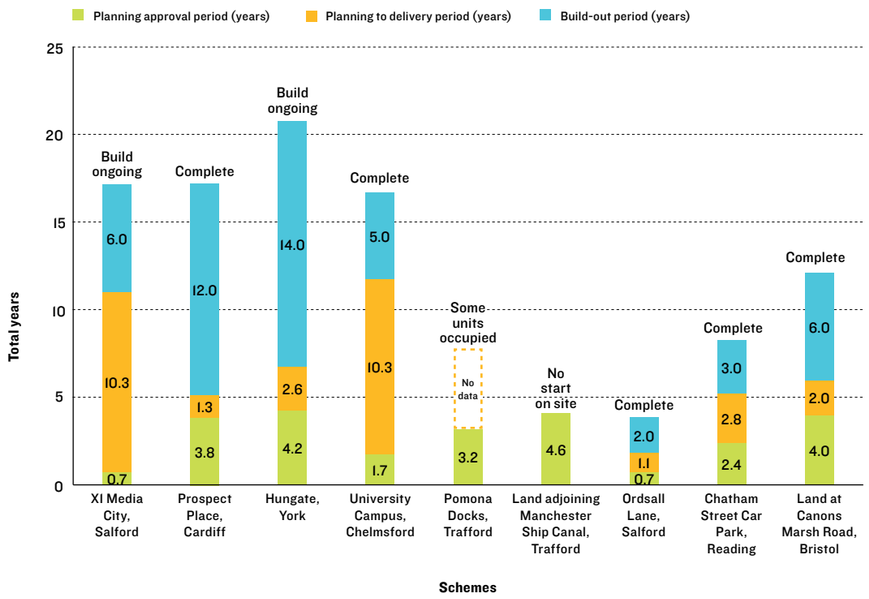
1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
   - **X1 Media City**: This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012. A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.
   - **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	XI Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE		**3.5**	**4.3**		
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE		**2.9**	**2.0**		

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the 'all or nothing' requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

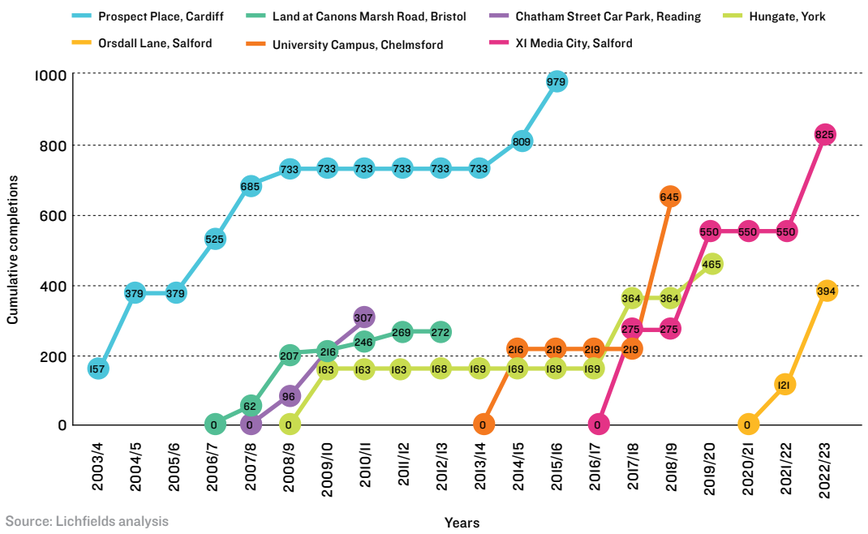
From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes available for sale and occupation. Furthermore, while some significant 'peak' annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
XI Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)



Source: Lichfields analysis

07 Conclusions

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the CMA's work. We present some statistical averages to assist the debate, but the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and it is these – alongside the characteristics of individual sites – that needs to be considered carefully by local authorities relying on these projects to deliver planned housing.

The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build out illustrates the risk of relying on a singular estimate.

Key findings

1. **Only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application**

   When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period from the date that the first application is validated. The lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period.

   The planning to delivery period is circa 1.3 – 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.



INSIGHT
START TO FINISH

2. Average annual build-out rates on large scale sites are lower than previous editions of this research

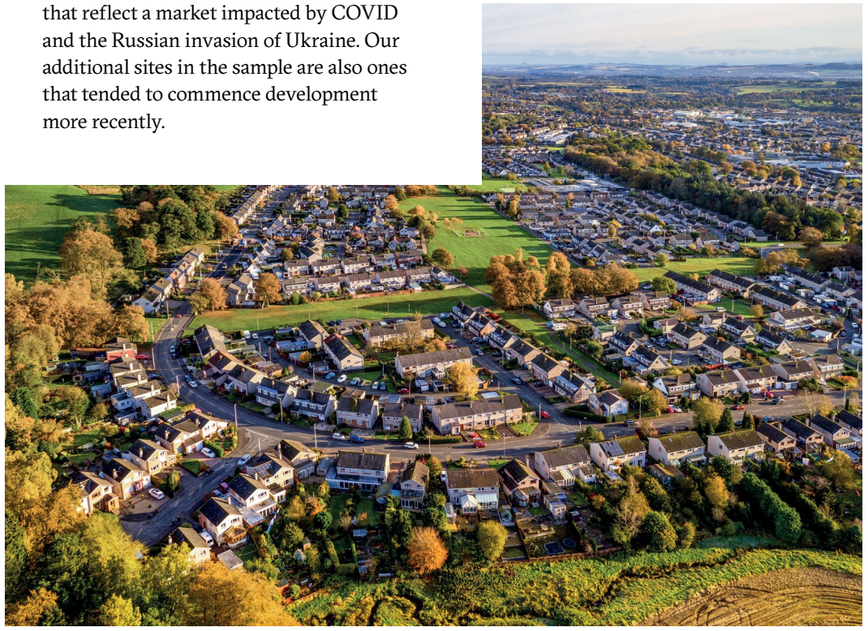
The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 151 dpa. For sites of under 1,000 homes, the median build-out rate is also lower. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.

3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows, a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked, and mortgage affordability will improve in 2025.



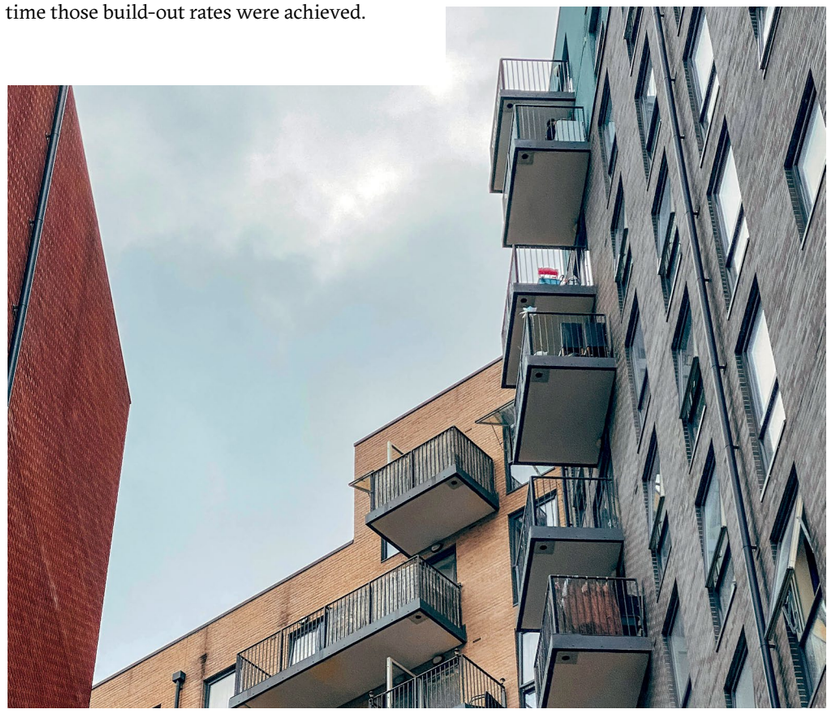
4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.

5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering 10-19% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.



© Super Straho via Unsplash

6. **Large-scale apartment schemes on brownfield land are less predictable forms of supply**

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the GFC.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

"While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year."

The CMA's recommendation on seeking to speed up the pace of new housebuilding should be viewed in the context of this research which, when compared with the first and second editions, shows that reported average build-out rates are slightly lower, albeit only slightly.

As we approach a general election, and with the housing crisis unresolved, the challenge of boosting housing delivery is being discussed with renewed vigour.

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed. Other factors – including funding for affordable housing and to unblock barriers to site delivery – are also needed.

In the current environment, a sufficient pipeline of sites with planning status in each location (itself dependent on a functioning planning system), with a suitably varied range of housing types and tenures, and the forecast recovery of the housing market from its recent downturn are all necessary to secure a recovery in the supply of new homes.

Appendices

Contents

Appendix 1: Definitions and notes
Appendix 2: Large sites table
Appendix 3: Small sites tables
Appendix 4: Solely apartment scheme details

INSIGHT
START TO FINISH

Appendix 1:
Definitions and notes

The ‘lead-in’

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time also includes the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The ‘planning approval period’

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwelling/s on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed ‘consent’ was considered reasonable and proportionate milestone for ‘planning’ in the context of this research. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted ‘planning to delivery period’.

The ‘planning to delivery period’

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the ‘first housing completion’

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The ‘annual build-out rate’

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Appendix 2: **Large sites tables**

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Ebbsfleet	Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312	613	553	347	533	619											
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	239	223	460	299
Houlton (Rugby Radio Station)	Rugby	6,200	2019/20	11	197	210																						
Land at Chilmington Green (South Ashford GC)	Ashford	5,750	2019/20	75	74																							
Sherford	South Hams	5,500	2016/17	7	130	142	151	113	108	183																		
Hanwood Park (East Kettering SUE)	North Northamptonshire	5,500	2016/17	29	124	132	179	103	230																			
North West Preston (MD2)	Preston	5,300	2015/16	57	250	297	411	307	266	372	359																	
Priors Hall	North Northamptonshire	5,200	2011/12	56	21	59	87	170	155	269	238	171	145	112														
Former Alconbury Airfield, Huntingdon	Huntingdonshire	5,000	2021/22	208	208																							
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	29	57	0	0	10													
Monkton Heathfield	Somerset West and Taunton	4,500	2012/13	22	76	220	191	222	145	84	49	89	67															
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47	95	344	177	218	251										
Thorpebury (North East Leicester SUE)	Charnwood	4,500	2021/22	32																								
Whitehouse - Western Expansion Area	Milton Keynes	4,320	2015/16	21	124	270	297	341	151	141	134																	
Valley Park (Land to the west of Great Western Park)	Vale of White Horse	4,254	N/A																									
Broughton Gate & Brooklands (Eastern Expansion Area)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138	144	305	239	242	187	309	254	158											
Glan Llyn (Former Llanwern Steelworks)	Newport	4,000	2011/12	10	35	112	76	127	75	124	154	67	55	190	171													
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86	57	53	153															
Stanton Cross	North Northamptonshire	3,650	2018/19	57	158	132	111																					
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262	200	195	164	211	236																	
Chatham Docks/ Waters	Medway	3,600	2021/22	199	193																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Overstone Leys (Northampton North SUE)	Daventry	3,500	2017/18	21	47	58	68	163	197																			
Northstowe Phase 2	South Cambridgeshire	3,500	2020/21	2	41																							
Long Marston Airfield	Stratford-upon-Avon	3,500	2021/22	77																								
South East Coalville (Land north and south of Grange Road)	North West Leicestershire	3,500	2018/19	4	63	124	272	207																				
Great Western Park	South Oxfordshire	3,364	2011/12	110	204	232	392	368	389	431	471	430	205															
Grantham North West Quadrant (Poplar Farm & Rectory Farm)	South Kesteven	3,350	2013/14	13	102	108	25	74	193	108	43	8																
Cambourne (original new settlement)	South Cambridgeshire	3,300	1999/00	42	180.5	180.5	213	337	620	151	378	268	219	191	161	206	154	151	128	239	201	96	126	87	32	61	93	
Lawley Village	Telford and Wrekin	3,300	2013/14	176	251	211	190	210	367	57	10																	
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	2010/11	22	164	273	321	562	378	350	265	340	191	107	136	158												
Land Around Fernwood	Newark and Sherwood	3,200	2019/20	3	53	87	141																					
Middlebeck (Land South of Newark)	Newark and Sherwood	3,150	2018/19	57	90	117	152	87																				
Oakley Vale	North Northamptonshire	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	127	103	51	40	9	78	68	59	88	87				
Land North of Beaconside/Stafford	Stafford	3,100	2018/19	10	33	30	27	111																				
Burgess Hill Northern Arc	Mid Sussex	3,040	N/A																									
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31	27		
North West Cambridge	Cambridge	3,000	2016/17	73	353	409	22	35	0																			
West of Waterlooville	Havant	3,000	2009/10	38	71	30	82	112	135	196	241	193	194	181	91	109	93											
Lighthorne Heath, Kingston Grange	Stratford-upon-Avon	3,000	2019/20	13	34	219																						
Towcester Vale SUE (JCS Policy T3)	West Northamptonshire	3,000	2017/18	42	192	135	145	174	236																			
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																			
Glebe Farm	Milton Keynes	2,900	2019/20	63	177	422	214																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Wintringham Park, St. Neots	Huntingdonshire	2,800	2020/21	50	81	166																						
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	90	19	0	4	0	0												
Mowbray, North of Horsham	Horsham	2,750	N/A																									
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419	344	361	348	291															
Winterstoke Village, Western-super-Mare	North Somerset	2,550	2014/15	132	185	242	161	178	42	56																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	238	387	424	122	254	262	194	234																
Branston Locks	East Staffordshire	2,500	2018/19	3	33	84	138																					
Great Wilsey Park, Haverhill	West Suffolk	2,500	2022/23	90																								
Kilnwood Vale	Horsham	2,500	2013/14	75	76	131	51	53	196	74	199																	
City Fields	Wakefield	2,500	2017/18	59	92	125	200	298	336																			
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118	71	28	0	54																
East Anton (Land East Icknield Way)	Test Valley	2,484	2009/10	184	257	103	181	135	229	146	184	162	239	279	242													
Kingsbrook (Aylesbury Garden Town)	Buckinghamshire	2,450	2016/17	92	219	181	204	184	235	201																		
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154	232	273	165	296													
Cambourne West	South Cambridgeshire	2,350	2021/22	93																								
The Steadings (Chesterton Strategic Site)	Cotswold	2,350	2022/23	2																								
Broadlands	Bridgend	2,309	1999/00	288	331	307	193	204	156	64	104	91	28	81	50	147	11											
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45	52	52	0	0														
Arborfield Garrison	Wokingham	2,225	2016/17	57	114	116	268	348	336																			
Fairfields (Western Expansion Area)	Milton Keynes	2,220	2015/16	114	165	267	288	163	105	112	77																	
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168	174	125	167	118	8												
Great Kneighton (Clay Farm)	Cambridge	2,188	2012/13	16	271	393	149	467	539	109	93	99	52															
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30												
Money Hill - Land north of Ashby de la Zouch	North West Leicestershire	2,050	2017/18	42	28	27	24	11	30																			
Land to the north east of Didcot	South Oxfordshire	2,030	N/A																									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90	13	53	121	49																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
North Felixstowe Garden Neighbourhood	East Suffolk	2,000	2021/22	10	65																							
Comeytrowe / Trull	Somerset West and Taunton	2,000	2021/22	4																								
Graven Hill	Cherwell	1,900	2016/17	1	28	122	44	176																				
North East of Didcot	South Oxfordshire	1,880	2019/20	27	82																							
Elvetham Heath (Fleet)	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6																
Colethrop Farm (Hunts Grove)	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22	112	127	209	122													
Great Denham	Bedford	1,750	2009/10	92	150	159	71	122	146	123	211	162	191	63	39	25	9											
Horwich Loco Works	Bolton	1,710	2018/19	3	33	45	30																					
Land at Berry Hill, Mansfield	Mansfield	1,700	2018/19	36	131	172	157	80																				
Tadpole Garden Village	Swindon	1,695	2014/15	27	161	400	215	448	328																			
Plymstock Quarry	Plymouth	1,684	2013/14	2	100	110	57	71	73	73	41	23	56															
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96				
Red Lodge	West Suffolk	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111											
Melton Road, Edwalton	Rushcliffe	1,667	2016/17	40	126	271	144	140																				
Newton Leys	Milton Keynes	1,650	2014/15	223	140	154	88	134	148	103	102	76																
South West Bicester (Phase 1 Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196	205	110	95															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8	110	76	16	87	0	161													
Chesterwell, North Colchester Urban Extension	Colchester	1,600	2015/16	150	150	150	150	150	56	59	90																	
Harworth Colliery - Simpson Park	Bassetlaw	1,600	2014/15	7	28	45	36	2	62	43	63	42																
Parc Derwen	Bridgend	1,577	2010/11	8	103	134	201	199	197	157	186	157	94	19	51													
Chesterfield Waterside, Brimington Road, Chesterfield	Chesterfield	1,550	2014/15	19	0	0	0	0	0	46	32	62																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86												
Horley North West Sector	Reigate and Banstead	1,510	2017/16	256	264	204	113	244	188																			
Jennet's Park, Peacock Lane	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28	16	65	47	0	0									
Northstowe Phase 1	South Cambridgeshire	1,500	2016/17	13	140	278	243	256	178																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Sutton New Hall Farm	Cheshire West and Chester	1,500	2016/17	41	90	13	53	121	49																			
Burleyfields (part of the West of Stafford Strategic Development Location)	Stafford	1,500	2020/21	49	98	175																						
Hartland Park	Hart	1,500	2020/21	46	64	66																						
West Carclaze Eco-community	Cornwall	1,500	2021/22	11	60																							
Handley Chase - Sleaford South Quadrant	North Kesteven	1,450	2018/19	2	6	29	17	134*																				
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85	49	3														
Rochester Riverside	Medway	1,400	2019/20	126	117	88	127																					
Park Prewett Hospital, Aldermaston Road, Basingstoke	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16						
Northern Gateway (Airfields and former Corus site)	Flintshire	1,325	2020/21	112	135	36																						
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90	163	29	71									
Kings Moat Garden Village	Cheshire West and Chester	1,300	2019/20	5	83	138																						
Bolnore Village	Mid Sussex	1,279	2000/01	10	66	61	244	159	168	52	99	15	0	0	0	53	68	68	86	61	51	18						
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24																	
Blue Boar Lane	Broadland	1,233	2015/16	75	165	253	243	180	160	110	47																	
Picket Twenty	Test Valley	1,219	2011/12	147	178	180	176	164	145	175	96	155	169	124	38													
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101	61	78	47	1									
Staynor Hall	Selby	1,200	2005/06	1	69	170	28	45	57	53	42	111	90	84	65	46	31	22	15	25	13							
Trumpington Meadows	Cambridge	1,200	2011/12	2	137	141	67	105	89	123	148	72	128	48														
North Ely (Orchards Green)	East Cambridgeshire	1,200	2018/19	49	50	70	80																					
Winnington Urban Village	Cheshire West and Chester	1,200	2013/14	86	159	144	176	62	142	65	70	17																
Heyford Park (Former RAF Upper Heyford)	Cherwell	1,183	2014/15	46	166	106	103	97	58	76																		
Oxley Park (East & West)	Milton Keynes	1,159	2004/05	52	166	295	202	115	91	75	163																	
Icknield Port Loop	Birmingham	1,150	2019/20	40	175																							
North West Haverhill, Ann Suckling Road	West Suffolk	1,150	2020/21	89	40	80																						

*(+67 communal accommodation)

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Orchard Park, Cambridge	South Cambridgeshire	1,120	2006/07	100	290	148	103	95	56	34	16	75	39	30	2	42												
Velmead Farm, Fleet	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4												
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157	181	19	48																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15	119	111	115	124																				
Llanwern Village	Newport	1,100	2019/20	31	74	39	52																					
Land at Kingsley Fields	Cheshire East	1,100	2018/19	49	151	125	177																					
Cottam Strategic Site (MDI)	Preston	1,100	2014/15	23	15	61	46	58	43	101	114	211																
Land north of Woodhall Business Park	Brentwood	1,100	2022/23	20																								
Bankside Phase 1, Banbury (Longford Park)	Cherwell	1,090	2014/15	148	218	140	142	96	167	52																		
Highwood	Horsham	1,090	2012/13	56	82	103	76	96	39	71	43	1																
Highfields Farm	South Derbyshire	1,064	2016/17	141	204	275	252	102	57																			
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116	105	108	58	76																	
Gedling Colliery/ Chase Farm	Gedling	1,050	2017/18	25	65	96	64	90																				
North East Bexhill (The Gateway)	Rother	1,050	2020/21	23	67	68																						
South Maldon Garden Suburb	Maldon	1,042	2018/19	5	45	111	137	163																				
Tamworth Golf Course (Amington Garden Village)	Tamworth	1,037	2017/18	28	90	155	87	112	68																			
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122	155	70	100	87	81															
Northampton North of Whitehills SUE	Daventry	1,000	2015/16	9	108	176	59	44	125	124	71																	
Weldon Park SUE	North Northamptonshire	1,000	2016/17	39	62	111	74	75	126																			
Land at former TRL site, Nine Mile Ride (Buckler's Park)	Bracknell Forest	1,000	2018/19	35	132	59	59	140																				
Arkall Farm, North of Ashby Road, Tamworth	Lichfield	1,000	2021/22	4	75																							
Limebrook Park, Wycke Hill, Maldon	Maldon	1,000	2019/20	5	60	85	110																					
RAF Cardington	Bedford	1,000	2014/15	5	108	100	109	36	57	81	144	276																
Collingtree Park - Northampton South SUE (JCS Policy N5)	West Northamptonshire	1,000	2020/21	98	100																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Northampton Upton Park SUE (JCS Policy N9)	West Northamptonshire	1,000	2020/21	4	130	139																						
Folkestone Harbour/ Seafront	Folkestone and Hythe	1,000	2021/22	84	40																							
Land to the north of Totton	New Forest	1,000	2022/23	51																								
Land West of Uckfield	Wealden	1,000	2018/19	3	50	45	35																					
Taylors Farm/ Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12												
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	112	91	13																	
Little Stanion	North Northamptonshire	970	2009/10	106	116	74	121	102	93	89	86	27	26	9	1	30												
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60	75	103	73	93	23										
Ingress Park, Greenhithe	Dartford	950	2002/03	184	0	275	100	74	0	119	0	0																
Upper Cambourne	South Cambridgeshire	950	2012/13	88	123	239	201	96	81	83	32	7																
Nar Ouse Millenium Commuity	King's Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0	37	13												
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42	15	18	49	16	32						
Badbury Park (Commonhead)	Swindon	890	2014/15	49	230	241	138	127	73																			
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30															
Abbotswood	Test Valley	790	2011/12	30	190	157	114	152	90	20	0	10	27															
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																			
The Parks, formally Staff College	Bracknell Forest	730	2007/08	104	88	101	54	47	72	59	94	78	0	0	0	0	0	0	0									
Northside	Gateshead	718	1999/00	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43								
Land at West Blyth accessed from Chase Farm Drive	Northumberland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90	62	37	53	58	56										
Alver Village (Rowner Renewal Project)	Gosport	700	2010/11	4	100	70	45	89	101	79	97	8	27	10	0													
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110	70	61	88	0	76																	
Beacon Park (South Bradwell)	Great Yarmouth	700	2015/16	42	58	81	79	54	113																			
Foxhill/Mulberry Park	Bath and North East Somerset	700	2016/17	8	110	120	86	70	88																			
Land North of Harvest Ride and South of Forest Road and East of West End Lane, Warfeild	Bracknell Forest	675	2015/16	3	85	75	117	88	92	67	25																	

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Staiths South Bank	Gateshead	667	2003/04	24	58	0	44	0	48																			
Jurston Farm	Somerset West and Taunton	650	2019/20	16	43	31																						
Land south of Wansbeck General Hospital, Ashington	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54	50	60	82	64	0							
Kings Hill Phase 3	Tonbridge and Malling	635	2018/19	29	95	120	100																					
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0								
Ochre Yards (Ref: 103/01)	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2	0	0	46	4	52	2													
Land West of Southwater	Horsham	606	2017/18	56	128	43	20																					
Former Runwell Hospital	Chelmsford	575	2016/17	92	89	87	70	55	43	46																		
Land to the west of Wallingford	South Oxfordshire	555	2020/21	18																								
Land Nnorth of Netherhouse Copse	Hart	528	2021/22	52	104																							
Thingwall Lane	Knowsley	525	2013/14	79																								
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	0	14	13	18	15											
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																				
Land west of Copthorne	Mid Sussex	500	2019/20	3	68	74	112																					

Appendix 3:
Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
128-134 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4:
Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated – 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 – 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated – 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued -21/06/2002
Extended planning period	03/724/R – Reserved Matters for 99 units 03/725/R – Reserved Matters for 58 units 02/1252/R – Full application including 677 apartments 03/01973/R – Full application including 222 residential units 04/2474c – Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c – 394 units – granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 – 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM – Phase II – 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM – Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM – Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM – outline to redevelop for 720 units – extension of time to 02/03741/OUT 13/03015/FULM – Phase II 195 units 15/01709/OUTM – Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM – Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 – 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated – 10/03/2004 Decision Issued – 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated – 13/03/2018 Decision Issued – 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown – unable to obtain completions data to identify year of first completion
Build period	Ongoing – unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated – 05/02/2003 Decision Issued (appeal) – 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated – 19/04/2004 Decision Issued – 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase 1), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal – Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued – 30/07/2010 First reserved matters application (78681/RM/2012) Validated – 12/05/2012 Decision Issued – 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated – 09/07/2015 Decision Issued – 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated – 17/02/2020 Decision Issued – 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued – 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 – 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation – 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued – 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated – 30/07/2004 Decision Issued – 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 – 3
Notes from LPA	N/A

The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

Read more

You can read more of our research and insight at lichfields.uk

Our bespoke products, services and insights



Small builders, big burdens

How changes in planning have impacted on SME house builders



Making a bad situation worse

The impact on housing supply of proposed changes to the NPPF



Headroom

Objective assessments of local housing needs



Sizemix

Securing the right mix in residential development proposals

Contacts

Speak to your local office or visit our website.



Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no. 2778116. Registered office: The Minster Building, 21 Mincing Lane, London EC3R 7AG.
© Nathaniel Lichfield & Partners Ltd 2024. All rights reserved.

Monmouthshire County Council
Replacement Local Development Plan (2018-2033)
Preferred Strategy
Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **5th December 2022 to 30th January 2023.** All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

PART 1: Contact details

Your/ your Client's details		**Agent's details*** *(if relevant)*	
Title:		[redacted]	
Name:			
Job title: *(where relevant)*			
Organisation: *(where relevant)*	Barratt David Wilson Homes	Savills UK Ltd	
Address:	[redacted]		
Telephone no:			
Email: *(if you have one)*			

*Note if agent's details are included, all correspondence will be sent to the agent.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: http://www.monmouthshire.gov.uk/planning-policy/current-consultations

Office Use Only
Representor Number ……
Submission Type (email/web/letter etc) ……

PART 2: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help us to understand the issues you raise.

Key Issues, Vision and Objectives (Paras 3.1 - 4.3 / Pages 10- 24)

Do you have any comments on the key Issues, Vision and Objectives?

Barratt David Wilson Homes have no specific comments to make on the Issues, Vision and Objectives – reflecting their purpose, they are inevitably fairly generic and uncontentious in nature. That said, there is perhaps an opportunity in the Vision for specific reference to be made to ensuring that sufficient housing is delivered to meet both forecast requirements and to address the existing shortfall.

Barratt David Wilson Homes welcome that the Issues, Vision, and Objectives recognise that there is a limited supply of previously developed land (Paragraph 3.6) and that it is not possible to avoid allocating land that is best and most versatile land (Paragraph 3.7).

Preferred Strategy (Paras 4.4- 4.8 / Pages 25-27)

Do you have any comments on the Preferred Strategy?

Specific comments are made with regards to the level and distribution of growth in subsequent questions within this representation in response to questions relating to Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy).

Strategic Policies S1 – Growth Strategy (Paras 4.9- 4.26 / Pages 27-32)

Do you have any comments on Strategic Policy S1 – Growth Strategy

Strategic Policy S1 (Growth Strategy) of the Preferred Strategy sets out the housing and job / employment land requirement over the Replacement Local Development Plan (RLDP) plan period and inherently underpins other policies that will be contained within the RLDP. A requirement for 5,400 homes over the RLDP period is identified with a 10% flexibility allowance proposed to be applied on top of this meaning that the delivery of 5,940 homes is to be planned for. This is Growth Option 2 as presented in the Growth and Spatial Options Paper (September 2022).

This is a drastic divergence in approach to the June 2021 version of the Preferred Strategy which identified a requirement for 7,605 homes over the RLDP plan period and made provision for the delivery of 8,366 homes.

Barratt David Wilson Homes supported the approach taken in the June 2021 Preferred Strategy and continue to believe that it is the correct strategy to be taken for the RLDP. As a whole, the Growth and Spatial Options Paper (September 2022) identifies it as the best performing of the three Growth Options against the RLDP's objectives. The table below compares how Growth Option 1 performs against the other Growth Options set out in the Paper:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

Where Growth Option 1 does achieve "Amber" scores, the Paper notes that "the nature and significance of effects will be dependent on where growth is located and how development is designed / implemented". In other words, the impacts associated with the selection of Growth Option 1 can be mitigated through thorough ensuring the

correct sites are allocated and that the sites incorporate inherent mitigation.

On the basis of the above, Barratt David Wilson Homes would wholeheartedly support an approach that uses Growth Option 1.

It is understood that Welsh Government objected to the growth option that was selected for the June 2021 Preferred Strategy and that this has driven the selection of Growth Option 2 which performs less well against the RLDP's objectives than Growth Option 1. If Growth Option 2 is to be used for the RLDP, Barratt David Wilson Homes have three comments on the various components that underpin it.

Migration

The same assumptions are made with regards to UK based migration in the December 2022 Preferred Strategy as in the June 2021 Preferred Strategy. This assumes immigration rates from Bristol and South Gloucestershire based on the average over the last five years (2014/15-2019/20) and from neighbouring planning authorities over the previous 19 years (2001/02-2019/20).

Paragraph 2.15 of the Edge Analytics Updating the RLDP Demographic Evidence (November 2021) paper provides a useful comparison of how the Average Net Household Inflow Per Annum differs over the last 19 years to the last two years as replicated in the table below:

Location of Origin	Average Net Household Inflow Per Annum	
	2001/02–2019/20	2018/19-2019/20
North Somerset	15	30
Forest of Dean	27	57
Bristol	65	148
South Gloucestershire	92	177
Total	199	412

Two things are evident from this table.

- The level of net inflow per annum is greater in recent years than longer terms trends. Whilst the PG Long Term Adjustment of 5 years for Bristol and South Gloucestershire will pick up on some of this recent increase, it will also include the preceding three years where net inflows from these authorities were likely to be lower (although the Edge Analytics "Updating the RLDP Demographic Evidence" paper does not provide this information); and

- Whilst Bristol and South Gloucestershire are the two authorities where the level of immigration is greatest, there have been substantial increases in inflow from other authorities close to the border with Monmouthshire (most notable are the Forest of Dean and North Somerset). These levels are considerably higher in the last two years compared to the previous 19 year.

Barratt David Wilson Homes support the use of a scenario that makes adjustments for changes to migration but suggest that, rather than a PG Long Term Adjustment of 5 years (i.e. the projected level of inflow should be derived from rates over the previous five years), a PG Long Term Adjustment of 2 years (i.e. the projected level of inflow should be derived from rates over the previous two years) should be used instead and that this should be applied to all authorities rather than just Bristol and South Gloucestershire.

2018- Based Household Projections

Growth Option 2 proposes to use the "Principal Variation" of the 2018-based household projections. Whilst 2021-based household projections are likely to be published prior to the adoption of the RLDP, these are not presently available and the selection of the 2018-based projections at this stage is therefore appropriate albeit it is suggested that this is reviewed when the 2021-based projections are published.

The challenge is that the Principal Variation of the 2018-based household projections have already failed to provide an accurate forecast of the number of households within Monmouthshire. The table below compares the various 2018-based household projections with the 2021 Census.

Method	Households in Monmouthshire as of 2021
Principal 2018-Based Household Projection	40,755 (Forecast)
Higher Variant 2018-Based Household Projection	40,797 (Forecast)
2021 Census	40,900 (Actual)

From the above table, it is evident that the actual number of households within Monmouthshire (as per the 2021 Census) is considerably greater than both the Principal 2018-Based Household Projection and the Higher Variant 2018-Based Household Projection. The effect is that, even after just three years from the base date, the projections have under-projected the number of household by between 145 and 103 homes.

On that basis, it is suggested by Barratt David Wilson Homes that it would be inappropriate to make use of the Principal 2018-Based Household Projection as a starting point for calculating the RLDP's housing requirement and instead the Higher Variant must be used.

Application of Flexibility Allowance

The Preferred Strategy proposed the application of a 10% flexibility allowance on top of the housing requirement – in essence 540 homes on top of the 5,400 home requirement so that the RLDP makes provision for 5,940 homes.

Footnote 23 of Paragraph 4.6 of the Preferred Strategy states that:

> *"In accordance with the Development Plans Manual (WG, March 2020) an allowance is provisionally made for a 10% flexibility allowance to factor in sites that may not come forward, unforeseen issues or to meet higher aspirations for the County to enable the provision/delivery of additional sites if all sites are delivered. The flexibility allowance will be given further consideration and refined at Deposit stage"*

This is an incorrect reading of the Development Plans Manual which, at Paragraph 5.59 states that:

> *"The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced."*

The 2022 Annual Monitoring Report, in its consideration of the adopted LDP performance at delivering Strategic Policy S2 (Housing Provision), states that:

> *"Ten years' worth of completions were recorded during the 2020-21 monitoring period, with the Plan delivering a shortfall of -1,500 units (33.3%) at that point when compared to the 10-year Plan requirement of 4,500 units."*

Despite the adopted LDP applying a 10% flexibility allowance in excess of the housing requirement, the latest Annual Monitoring Report, which now covers the entire adopted LDP plan period, demonstrates a substantial shortfall in housing delivery against requirement.

On this basis, there is a clear justification that is robustly evidenced for the incorporation of a higher flexibility

allowance that is considerably higher than the 10% figure that is suggested as a starting point in the Development Plans Manual as a starting point and it is therefore suggested that there is a robust justification for the incorporation of a 25% flexibility allowance on top of housing requirement.

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.27 - 4.35 / Pages 33 - 40)

Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?

Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) effectively does four things:

1) Sets out a settlement hierarchy for the distribution of housing to be delivered across the RLDP period;

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period; and

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Comments are made on point in turn below:

1) Sets out a spatial hierarchy for the distribution of housing to be delivered across the RLDP period;

Strategic Policy 2 (Spatial Distribution of Development – Settlement Hierarchy) sets the settlement hierarchy that is proposed for the Replacement LDP. Penperlleni, alongside Usk and Raglan, is included as a Secondary Settlement which now, through the inclusion of Caldicot (which incorporates the wider Severnside sub region) as a Main Settlement as proposed in the December 2022 Preferred Strategy, is the second tier of the settlement hierarchy.

Barratt David Wilson Homes support the continued inclusion of Penperlleni as a Secondary Settlement. This reflects the conclusions of the Sustainable Settlements Appraisal (December 2022) prepared by Monmouthshire County Council (MCC) which, when considering matters relating to a settlement's range of services, accessibility by public and private transport, and level of constraint, identified Penperlleni as one of the more sustainable settlements.

Barratt David Wilson Homes also note that this tier is now proposed to be renamed "Secondary Settlements" rather than "Rural Secondary Settlements". Whilst this may be just a modest name change, it reflects that Penperlleni is a sustainable location and is supported by Barratt David Wilson Homes.

Neither Strategic Policy 2 (Spatial Distribution of Development – Settlement Hierarchy) itself or its supporting text, identifies how this growth will be distributed across the three Secondary Settlements. Whilst it is acknowledged that growth will be directed to the other Secondary Settlements, Barratt David Wilson Homes suggest that a high proportion of the homes to be delivered across new housing allocations should be in Penperlleni.

On the one hand, this is because Penperlleni is not subject to the same level of constraints that Raglan and Usk are. Much of Usk is within Flood Zone 3, within which the principle of new residential development is not permitted in principle. Raglan is subject to heritage constraints whilst the appropriateness of the settlement to support significant amounts of new development was questioned by the Minister for Housing and Local Government (ref. APP/E6840/V/18/3218503). New housing can therefore be delivered in Penperlleni which is appropriate with regards to site constraints and that delivers strongly against the RLDP's 17 objectives.

On the other, this is because Barratt David Wilson Homes' experience from the "Land to the South of School Lane" site in Penperlleni is that there is a high level of demand for houses in the area and that it is a location that is attractive to the market. Barratt David Wilson Homes delivered the "Land to South of School Lane" site in its

entirety early in the RLDP plan period, compared to Raglan where the "Land at Chepstow Road" site appears to have stalled and just seven out of the allocated 20 homes at the "Cwrt Burrium, Monmouth Road" site in Usk have been delivered. If the Land West of Usk Road were to be allocated there can be confidence that Barratt David Wilson Homes can deliver the site in the early part of the RLDP plan period.

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period;

The proposal is for 6% of new housing to be distributed to the three Secondary Settlements. This equates to a total of 380 homes over the adopted LDP (ALDP) plan period. Of these, 100 have already been completed since the RLDP's start date, 45 committed, an allowance made for 80 through windfalls and small sites, and 155 across new housing allocations. The distribution proposed in the Secondary Settlements is broadly similar to the Rural Secondary Settlements in the adopted LDP.

Barratt David Wilson Homes suggest that the apportionment of the housing requirement between Tiers 2, 3, and 4 of the Preferred Strategy needs further refinement. At present, the Preferred Strategy indicates that 504 homes (accounting for 8% of the total requirement) will be delivered in the Main Rural settlements and the Minor Rural Settlements – substantially more than that to be delivered in the Secondary Settlements.

This approach directs what is a fairly high proportion of the quantum of housing to be planned for in the RLDP, in a series of settlements which the Sustainable Settlements Appraisal (December 2022) identifies as being considerably less sustainable than the Secondary Settlements. Trellech, for example, is a Main Rural Settlement in the Preferred Strategy but is identified in the Sustainable Settlements Appraisal (December 2022) as performing half as well as Penperlleni with regards to the sustainability scoring system. Such an approach is not considered to align with Objective 10 of the Preferred Strategy which seeks to deliver new housing in well-connected places.

It has also proven to be a strategy that has not been successful in the adopted LDP. Whilst the adopted LDP anticipated 16% of new homes being delivered in the "Rural" tiers, the LDP Review Report (March 2018) found that just 11% of new housing as of 2018 had been delivered within the "Rural" tiers with there being further decline in the subsequent years with just 5.26% of competitions in the Rural tiers in 2021/2022. These figures are percentages of homes completed and given the under delivery of housing over the adopted LDP period, the numerical shortfall compared to expectations in the adopted LDP is far greater.

Of particular concern should be the Main Villages tier of the settlement hierarchy. This is a tier where housing allocations were made in the ALDP and are proposed to be made in the RLDP. It is the highest tier of the "Rural" tiers, within which the ALDP makes allocations for 192 homes across 17 sites. Over the LDP plan period Table 1 of the 2022 Annual Monitoring Report recognises that planning permission has been granted for just seven sites within the Main Villages and that these seven sites have capacity for just 70 homes of which 35 have either been completed or are under construction. This is just 18% of the total homes that were expected to be delivered on these allocated sites.

Taking the above together, it seems that it is both unsustainable and unachievable to direct such a high proportion of new housing to the "Rural" tier of tiers of the settlement hierarchy with this instead suggested to be directed towards the Secondary Settlements.

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Included in the section relating to Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) is Table 2 which provides a summary of the various components for each settlement that will deliver the requirement set out in Strategic Policy S1 (Growth Strategy). Whilst clearly the "Completions 2018-2021" component is a fixed

position that reflects previously completed, Barratt David Wilson Homes have comments on other components of Table 2.

Existing Commitments

Table 2 identifies that a total of 1,261 homes are to be delivered through Existing Commitments, these being sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement. From this list, the Housing Background Paper (December 2022) removes three sites which officers do not expect to come forward.

The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Barratt David Wilson Homes. There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed. The approach taken in the Strategic Options Paper (November 2021) prepared by Cardiff Council applied a 20% discount on Existing Commitments and it is considered that such a discount should be applied as a minimum.

On this basis, it is suggested that the "Existing Commitments" component should be reduced by 20% from 1,261 to 1,009.

Total Allowances (Small Sites; Windfalls)

The "Total Allowances" is broken down further in the Housing Background Paper (December 2022) into "Windfall Sites" and an "Allowance for Small Sites".

With regards to the calculation of "Windfall Sites", Barratt David Wilson Homes welcome that an assumption has not been made on the basis of previous average delivery rates given that this will have been distorted by permissions under the unallocated sites policy. The preparation of the Housing Potential Study as detailed in Appendix 3 of the Housing Background Paper (December 2022) is a sensible method for forecasting delivery on windfall sites. That said, there can be no certainty that all 14 identified sites will be delivered or that they will deliver the number of homes that they are expected to in the Housing Potential Study, particularly given that only four are under the ownership of MCC. Specific to Penperlleni, the "Land off Capel Ed Lane" site, which is identified as having capacity for 12 homes in the Housing Background Paper (December 2022), has been included within Penperlleni's settlement boundary since the Unitary Development Plan was adopted in 2006 without a planning application having been submitted on it. Given the lack of certainty with regards to the delivery of these sites, it is suggested that a substantial discount, perhaps of as much as 50% should be applied.

The calculation for the "Allowance for Small Sites" is based on the average delivery of such sites over the previous 10 years, adjusted to remove any sites delivered in the Upper River Wye Catchment Area (because they could not be delivered due to the phosphate issue) and to include a 20% discount in Rural Areas. There are two points to be made here:

- Whilst acknowledging that the delivery of Small Sites in rural areas will be more challenging in the RLDP (hence the 20% reduction), it is not clear why such a reduction is not applied to other tiers of the

settlement hierarchy where, much like the Rural Areas, the number of units that will be delivered will likely be less as the easier opportunities have been delivered. In many ways, Table 7 of the Housing Background Paper (December 2022) already shows this with the level of small site completions being 45 compared against a ten year average of 82. It is suggested that such a discount need to be applied to the allowance for all tiers of the hierarchy; and

- No allowance is made for the demolition of existing homes which will inevitably be required to deliver windfall sites as, for example, a single property is demolished to provide the land required for a greater number of homes. Such an approach has been taken by Cardiff Council which had been calculating demolitions over the LDP period (which it is understood that MCCC may not have done) and this equated to 10% of units to be delivered via windfall. It is therefore suggested that a discount of 10% is applied for the loss of existing housing stock.

Barratt David Wilson Homes therefore suggest that Table 2 needs to be amended so that 609 homes are assumed to be delivered as Total Allowances (Small Sites; Windfalls) – 105 on Windfall Sites and 504 as an Allowance for Small Sites.

Allocations

Taking the above together, even if no change is made to the housing requirement set out in Strategic Policy S1 (Growth Strategy), there is a requirement for an additional 543 homes to be allocated than forecast in Table 2.

Strategic Policy S7 – Preferred Strategic Site Allocations
(Please State which Preferred Strategic Site Allocation you are commenting on)
(Paras 5.32 - 5.36 / Pages 56- 59)

Do you have any comments on the Preferred Strategic Site Allocations?

Strategic Policy S7 (Preferred Strategic Site Allocations) - Caldicot East (CS0087 and CS0251) and
Strategic Policy S7 (Preferred Strategic Site Allocations) - Abergavenny East (CS0213)

The Preferred Strategy identifies the "Caldicot East" sites as a Preferred Strategic Site Allocation with capacity to deliver 1,460 homes of which 925 will be delivered within the RLDP plan period and "Abergavenny East" as having capacity for 635 homes of which 500 are to be delivered within the RLDP plan period.

Included at Appendix 1 is a paper entitled "Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites?" prepared by Lichfields which examines the timescales associated with the delivery of large strategic housing sites.

This suggests that the timescales associated with the delivery of larger strategic sites of this scale is often greater than anticipated, both due to the time associated with securing planning permission and the time required to deliver both the onsite and offsite infrastructure that is required before a single property is delivered.

In reality, the timescales for the delivery of the first homes on these sites are likely to be greater and the delivery rates lower when compared to the findings of the Lichfields Report. This is because:

- Whilst presumably agreements are already in place between landowners, both sites are under fragmented rather than single ownerships;

- Neither site is being promoted by housebuilders. The Abergavenny East site is being promoted by a housing association which appears not to have secured planning permission for a site greater than 57 homes whilst Caldicot East is being promoted by a land promoter (rather than a developer) and the local authority;

- There is likely to be significant upfront infrastructure costs for each site, potentially consisting of a new junction from the A465 for Abergavenny East and a new roundabout from the M48 for Caldicot East. This may need to be delivered in advance of any houses being delivered.

On that basis, Barratt David Wilson Homes question the ability of both Caldicot East and Abergavenny East to deliver the quantum of homes that the Preferred Strategy expects over the RLDP plan period.

Other Strategic Policies (Please State which Strategic Policy you are commenting on)
(Paras 5.1-5.123 / Pages 41-98)

Do you have any comments on the Strategic policies?

Strategic Policy S6 (Affordable Housing)

Barratt David Wilson Homes have concerns with the requirement for 50% of homes to be delivered as affordable. If MCC is to progress a strategic policy where 50% of units are required to be affordable than this is clearly going to mean that the viability of a substantial number of sites which are being promoted by the private sector become more marginal. This is likely to result in complex partnerships between private developers and registered social landlords with there likely becoming a requirement for grant funding to allow for their delivery. Accordingly, it would follow that this should be planned for through the incorporation of an increased flexibility allowance beyond that currently set out in Strategic Policy S1 (Growth Strategy).

Notwithstanding the above, Barratt David Wilson Homes have provided comments in connection to Strategic Policy S1 (Growth Strategy) suggesting that the housing requirement for the RLDP should be higher than currently planned for in the Preferred Strategy. This in turn would result in an increase in the affordable homes target.

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on) (Appendix 7 Pages 136-147

Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

Any other Comments

Do you have any other comments on the Preferred Strategy?

Welsh Language

We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positivee effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Initial Integrated Sustainability Appraisal (separate document)

Do you have any comments on the Initial Integrated Sustainability Appraisal Report?
Habitats Regulations Assessment (separate document)
Do you have any comments on the Habitats Regulations Assessment?

To assist with the efficient processing of responses we would encourage you to submit your comments via email to: planningpolicy@monmouthshire.gov.uk. If this is not possible completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 30th January 2023**.

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. ☐

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. ☐

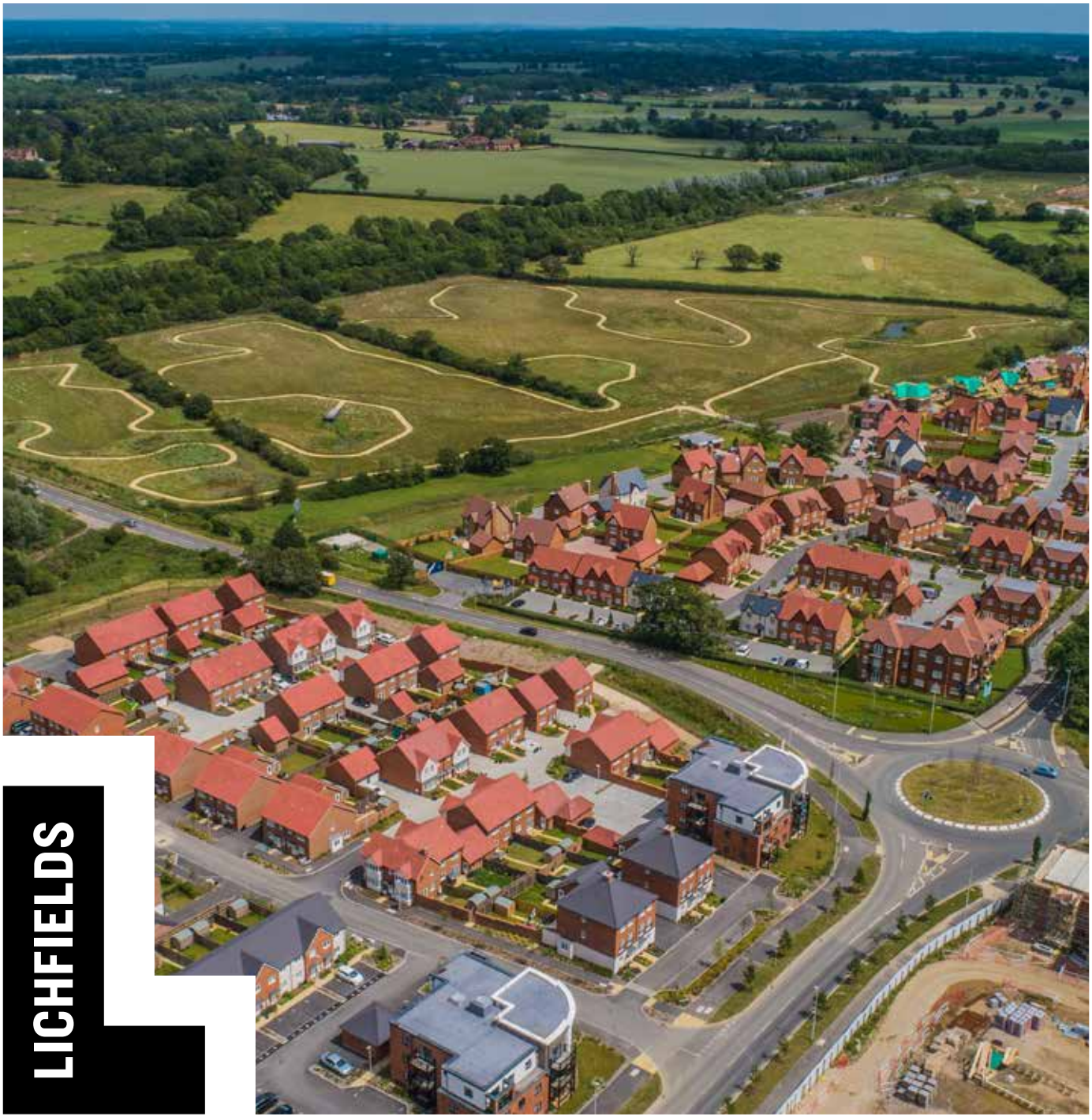
Appendix 1 - Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites (Lichfields: February 2020)

INSIGHT
FEBRUARY 2020

Start to Finish

What factors affect the build-out rates of large scale housing sites?

SECOND EDITION



LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 50 years.

lichfields.uk



Executive summary

Lichfields published the first edition of Start to Finish in November 2016. In undertaking the research, our purpose was to help inform the production of realistic housing trajectories for plan making and decision taking. The empirical evidence we produced has informed numerous local plan examinations, S.78 inquiries and five-year land supply position statements.

Meanwhile, planning for housing has continued to evolve: with a revised NPPF and PPG; the Housing Delivery Test and Homes England upscaling resources to support implementation of large sites. Net housing completions are also at 240,000 dwellings per annum. With this in mind, it is timely to refresh and revisit the evidence on the speed and rate of delivery of large scale housing sites, now looking at 97 sites over 500 dwellings. We consider a wide range of factors which might affect lead-in times and build-out rates and have drawn four key conclusions.

In too many local plans and five-year land supply cases, there is insufficient evidence for how large sites are treated in housing trajectories. Our research seeks to fill the gap by providing some benchmark figures - which can be of some assistance where there is limited or no local evidence - but the averages derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site.

We have drawn four key conclusions:

1 Large schemes can take 5+ years to start

Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post recession

Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors.

3 Large greenfield sites deliver quicker

Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.

Key figures

180 sites assessed, with combined yield of 213k+ dwellings; 97 sites had 500+ homes

c.3yrs average time taken from outline decision notice to first dwelling completions on sites of 500+ homes

8.4yrs the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwellings

160 dpa the average annual build-out rate for a scheme of 2,000+ dwellings (median: 137)

68 dpa the average annual build rate of a scheme of 500-999 dwellings (median: 73)

+34% higher average annual build-out rate on greenfield sites compared with brownfield sites

61 dpa average completions per outlet on sites with one outlet, dropping to 51 for sites of two outlets, and 45 for sites with three outlets

01
Introduction

This is the second edition of our review on the speed of delivery on large-scale housing development sites. The first edition was published in November 2016 and has provided the sector with an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

Over this period, housing delivery has remained at or near the top, of the domestic political agenda: the publication of the Housing White Paper, the new NPPF, an emboldened Homes England, a raft of consultations on measures intended to improve the effectiveness of the planning system and speed up delivery of housing. Of particular relevance to *Start to Finish* was the completion of Sir Oliver Letwin's independent review of build out ("the Letwin Review"), the inclusion within the revised NPPF of a tighter definition of 'deliverable' for the purposes of five-year housing land supply (5YHLS) assessment, and the new Housing Delivery Test which provides a backward looking measure of performance. The policy aim is to focus more attention on how to accelerate the rate of housing build out, in the context of the NPPF (para 72) message that the delivery of a large numbers of new homes can often be best achieved through larger scale development such as new settlements or significant extensions to existing villages and towns, but that these need a realistic assessment of build-out rates and lead in times of large-scale development.

This second edition of *Start to Finish* is our response to the latest policy emphasis. It provides the planning sector with real-world benchmarks to help assess the realism of housing trajectory assumptions, particularly for locations where there have been few contemporary examples of strategic-scale development. The first edition looked in detail at how the size of the site affected build-out rates and lead in times, as well as other factors such as the value of the land and whether land was greenfield or brownfield. We have updated these findings, as well as considering additional issues such as how the affordability of an area and the number of outlets on a site impacts on annual build-out rates.

We have also expanded the sample size (with an extra 27 large sites, taking our total to 97 large sites, equivalent to over 195,000 dwellings) and updated with more recent data to the latest monitoring year (all data was obtained at or before the 1st April 2019).



Our research complements, rather than supplants, the analysis undertaken by Sir Oliver Letwin in his Review. The most important differentiation is that we focus exclusively on what has been built, whereas each of the sites in the Letwin Review included forecasts of future delivery. Additionally, the Letwin Review looked at 15 sites of 1,500+ homes, of which many (including the three largest) were in London. By contrast, the examples in this research sample include 46 examples of sites over 1,500 homes across England and Wales, the majority of which are currently active. As with the first edition of our research, we have excluded London because of the distinct market and delivery factors in the capital.

Contents

01	**Introduction**	1
02	**Methodology**	2
03	**Timing is everything**	5
04	**How quickly do sites build out?**	9
05	**What factors influence build-out rates?**	14
06	**Conclusions**	18

180
sites

97
large sites of 500 units or more

27
additional sites compared with our 2016 research

8
sites also included in Sir Oliver Letwin's review

02 Methodology

The evidence presented in this report analyses how large-scale housing sites emerge through the planning system, how quickly they build out, and identifies the factors which lead to faster or slower rates of delivery.

We look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the various stages of development have been codified. Figure 1 sets out the stages and the milestones used, which remain unchanged from the first edition of this research. The overall 'lead-in time' covers stages associated with gaining an allocation, going through the 'planning approval period' and 'planning to delivery period', finishing when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time. The annualised build-out rates are also recorded for the development up until the latest year where data was available at April 2019 (2017/18 in most cases). Detailed definitions of each of these stages can be found in Appendix 1. Not every site assessed will necessarily have gone through each component of the identified stages as many of the sites we considered had not delivered all dwellings permitted at the time of assessment, some have not delivered any dwellings.

Information on the process of securing a development plan allocation (often the most significant step in the planning process for large-scale schemes, and which – due to the nature of the local plan process - can take decades) is not easy to obtain on a consistent basis across all examples, so is not a significant focus of our analysis. Therefore, for the purposes of this research the lead-in time reflects the start of the planning approval period up to the first housing completion.

The 'planning approval period' measures the validation date of the first planning application on the site (usually an outline application but sometimes hybrid), to the decision date of the first detailed application to permit dwellings in the scheme (either full, hybrid or reserved matters applications). It is worth noting that planning applications are typically preceded by significant amounts of pre-application engagement and work, plus the timescale of the local plan process.

The 'planning to delivery' period follows immediately after the planning approval period and measures the period from the approval of the first detailed application to permit development of dwellings and the completion of the first dwelling.

Development and data

Whilst our analysis focuses on larger sites, we have also considered data from the smaller sites for comparison and to identify trends. The geographic distribution of the 97 large sites and comparator small sites is shown in Figure 2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to secure a range of locations and site sizes in the sample, but there is no way of ensuring it is representative of the housing market in England and Wales as a whole, and thus our conclusions may not be applicable in all areas or on all sites. In augmenting our sample with 27 additional large sites, new to this edition of our research, we sought to include examples in the Letwin Review that were outside of London, only excluding them

Box I: Letwin Review sites

1. Arborfield Green (also known as Arborfield Garrison), Wokingham
2. Ledsham Garden Village, Cheshire West & Chester
3. Great Kneighton (also known as Clay Farm), Cambridge (included in the first edition of this research)
4. Trumpington Meadows, Cambridge
5. Graven Hill, Cherwell
6. South West Bicester, Cherwell
7. Great Western Park, South Oxfordshire
8. Ebbsfleet, Gravesham and Dartford (included in the first edition of this research)

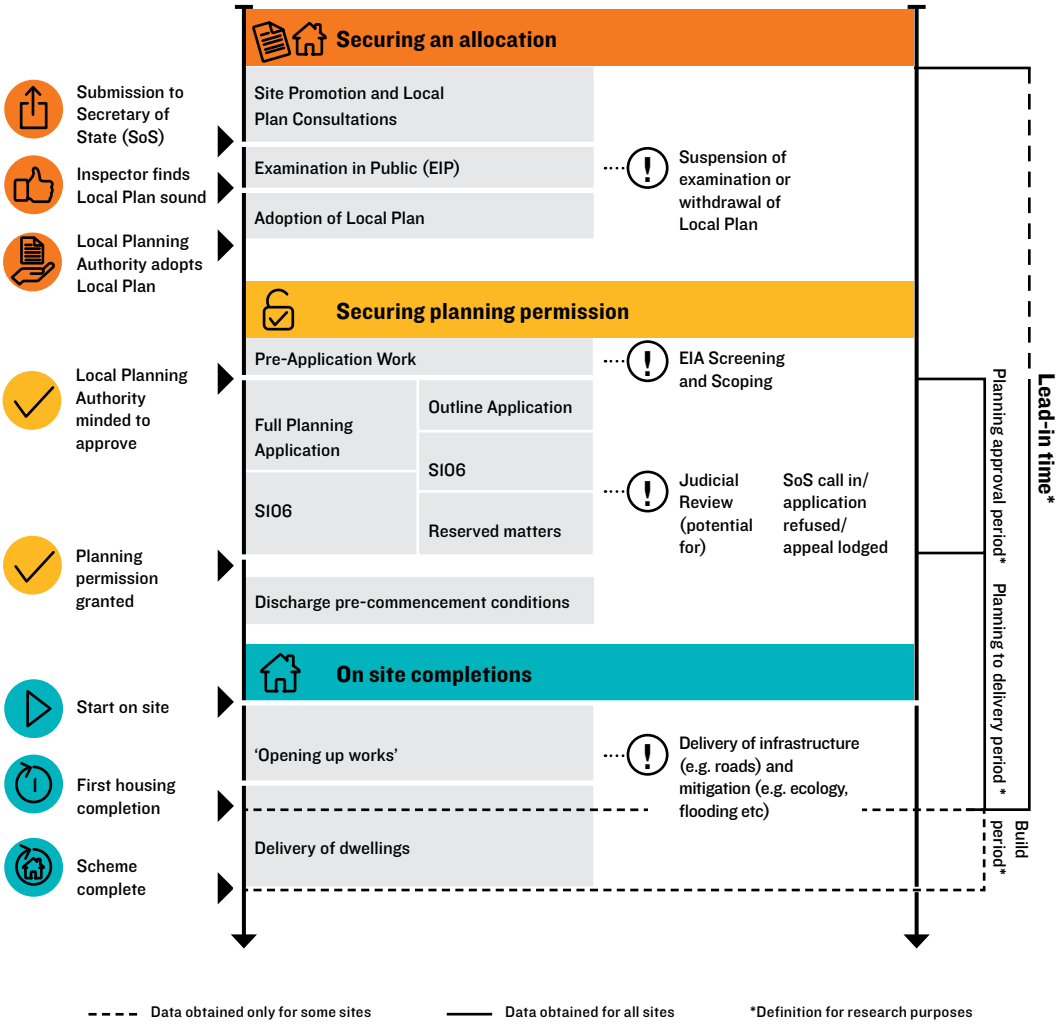
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

In most instances, we were unable to secure the precise completion figures for these sites that matched those cited in the Letwin Review. Sources for data Lichfields has obtained on completions for those sites that also appear in the Letwin Review are included at the end of Appendix 2.

The sources on which we have relied to secure delivery data on the relevant sites include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents[1] produced by local authorities;
2. By contacting the relevant local planning authority, and in some instances the relevant County Council, to confirm the data or receive the most up to date figures from monitoring officers or planners; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



Source: Lichfields analysis

[1] Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

units on large sites of 500 or more homes

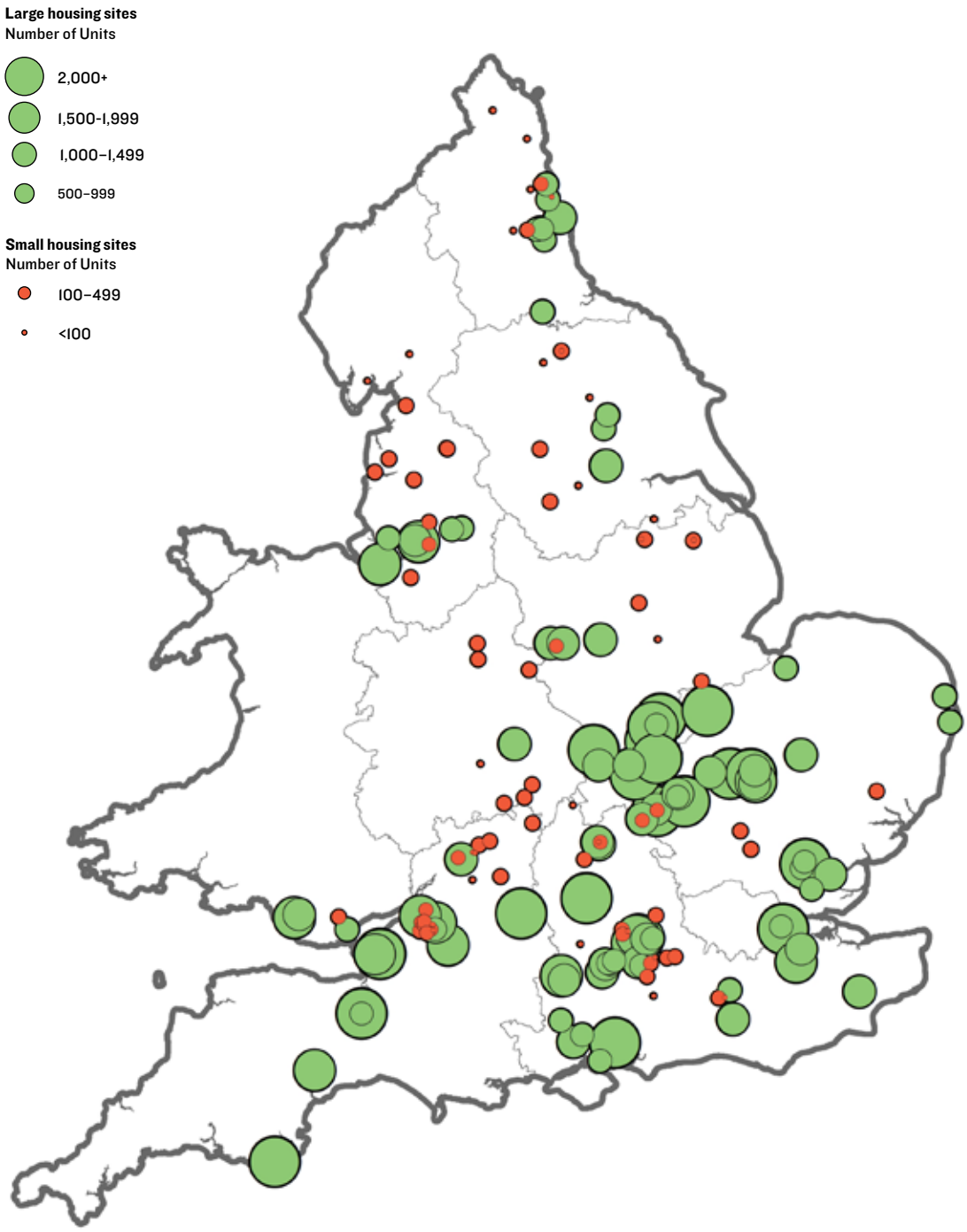
16,467

units on small sites under 500 homes

35

sites of 2,000 homes or more

Figure 2: Map of site sample by size of site (total dwellings)



Source: Lichfields analysis

03
Timing is everything: how long does it take to get started?

In this section we look at lead in times, the time it takes for large sites to get the necessary planning approvals. Firstly, the changing context of what 'deliverable' means for development. Secondly, the 'planning approval period' (the time it takes for large sites to get the necessary planning approvals). And thirdly, the 'planning to delivery period' (the time from approval of the first detailed application to permit development of dwellings to the completion of the first dwelling).

The new definition of 'Deliverable'

The question of how quickly and how much housing a site can begin delivering once it has planning permission, or an allocation, has become more relevant since the publication of the new NPPF with its new definition of deliverable. Only sites which match the deliverability criteria (i.e. suitable now, available now and achievable with a realistic prospect that housing will be delivered on the site within five years) can be included in a calculation of a 5YHLS by a local authority. This definition was tightened in the revised NPPF which states that:

"sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years". (emphasis added)

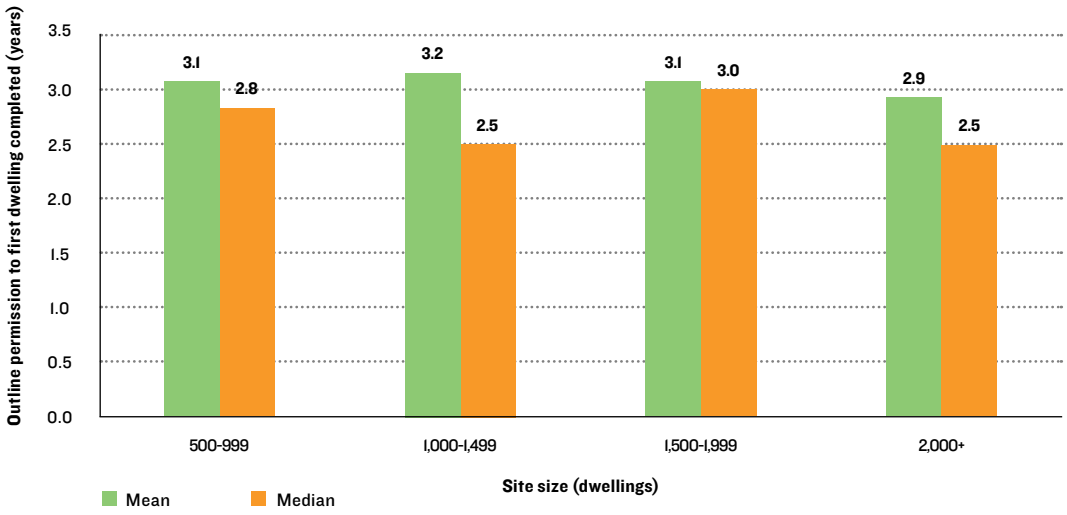
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance[2] and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about site viability, ownership constraints or infrastructure provision. In this context, it is relevant to look at how long it takes, on average, for a strategic housing site to progress from obtaining outline permission to delivering the first home (or how long it takes to obtain the first reserved matters approval, discharge pre-commencement conditions and open up the site), and then how much housing could be realistically expected to be completed in that same five-year period.

Based on our sample of large sites, the research shows that, upon granting of outline permission, the time taken to achieve the first dwelling is – on average c.3 years, regardless of site size. After this period an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4). Outline planning permissions for strategic development are not

c.3 years

average time from obtaining outline permission to first dwelling completion on sites of 500+ homes

Figure 3: Average time taken from gaining outline permission to completion of the first dwelling on site (years), compared to site size



Source: Lichfeilds analysis

[2] Planning Practice Guidance Reference ID: 68-007-20190722

Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period.

always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development[3]. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

Figure 4 considers the average timescales for delivery of the first dwelling from the validation of an outline planning application. This demonstrates that only sites comprising fewer than 499 dwellings are – on average - likely to deliver anything within an immediate five year period. The average time from validation of an outline application[4] to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five-year period for land supply calculations.

Comparison with our 2016 findings

Planning Approval Period

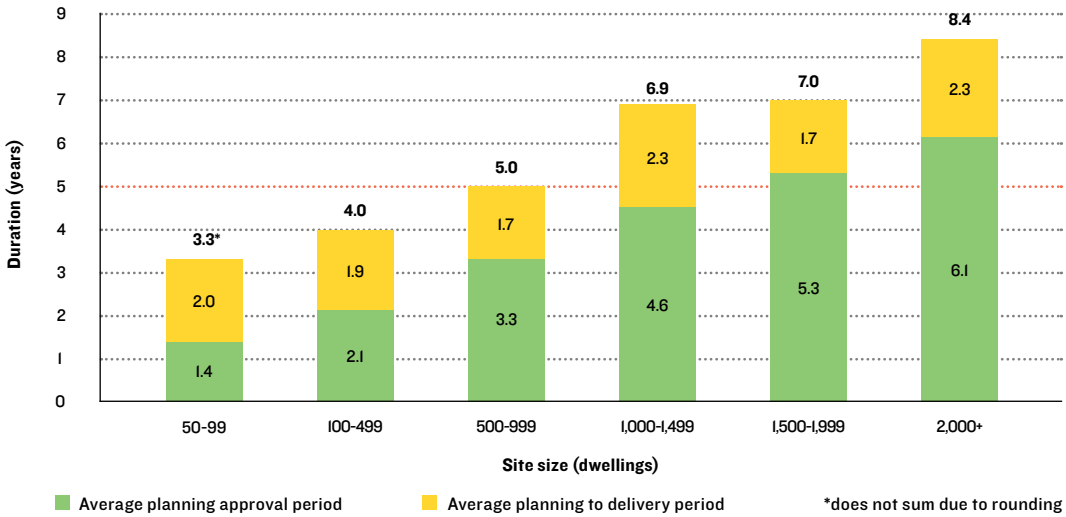
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant variations within this average, with some sites progressing very slowly or quickly compared to the other examples. This is unsurprising as planning circumstances will vary between places and over time.

Table 1: Average planning approval period by size of site (years)

Site Size	1st edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

[3] Realising Potential - our research for the Land Promoters and Developers Federation in 2017 - found that 41% of homes with outline planning permission were promoted by specialist land promoter and development companies, compared to 32% for volume house builders.

[4] The planning approval period could also include a hybrid or full application, but on the basis of our examples this only impacts a small number of sites

Planning to Delivery Period

Although there is little difference between the average planning approval periods identified in this research compared to our first edition findings, the average lead-in time after securing planning permission is higher (Figure 5). It is this period during which pre-commencement planning conditions have to be discharged as well as other technical approvals and associated commercial agreements put in place.

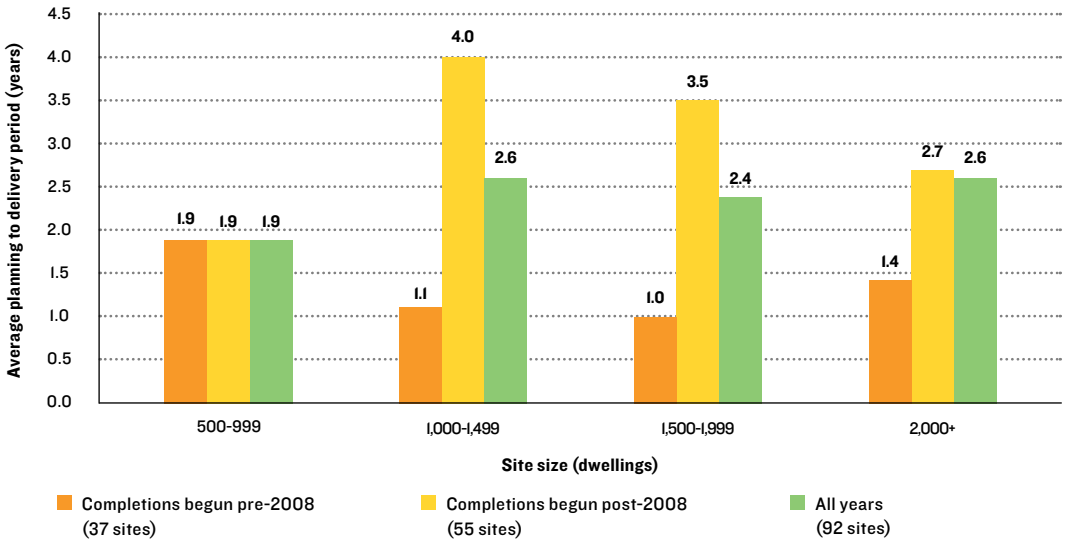
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 8 of these sites had not delivered their first home but have subsequently). This implies that the introduction of more recent examples into the research, including existing examples which have now commenced delivery[5], has seen the average for planning to delivery periods lengthening.

A similar trend is apparent considering the 55 sites that delivered their first completions after 2007/08. These have significantly longer planning to delivery periods than those where completions began prior to the recession. The precise reasons are not clear, but is perhaps to be expected given the slowdown in housing delivery during the recession, and the significant reductions in local authority planning resources which are necessary to support discharge of pre-commencement conditions. However, delays may lie outside the planning system; for example, delays in securing necessary technical approvals from other bodies and agencies, or market conditions.



Sites that delivered their first completion during or after the 2007/08 recession have significantly longer planning to delivery periods than sites which began before.

Figure 5: Planning to delivery period, total average, pre and post-2008



Source: Lichfeilds analysis

Figure 5: Five of the large sites examples do not have a first dwelling completion recorded in this research

[5] Priors Hall has been amended since the first edition based on more recent data

In demand: how quickly do high pressure areas determine strategic applications for housing?

Using industry-standard affordability ratios, we found that areas with the least affordable places to purchase a home (i.e. the highest affordability ratios) tended to have longer planning to delivery times than areas that were more affordable. This is shown in Figure 6, which splits the large site sample into national affordability quartiles, with the national average equating to 8.72.

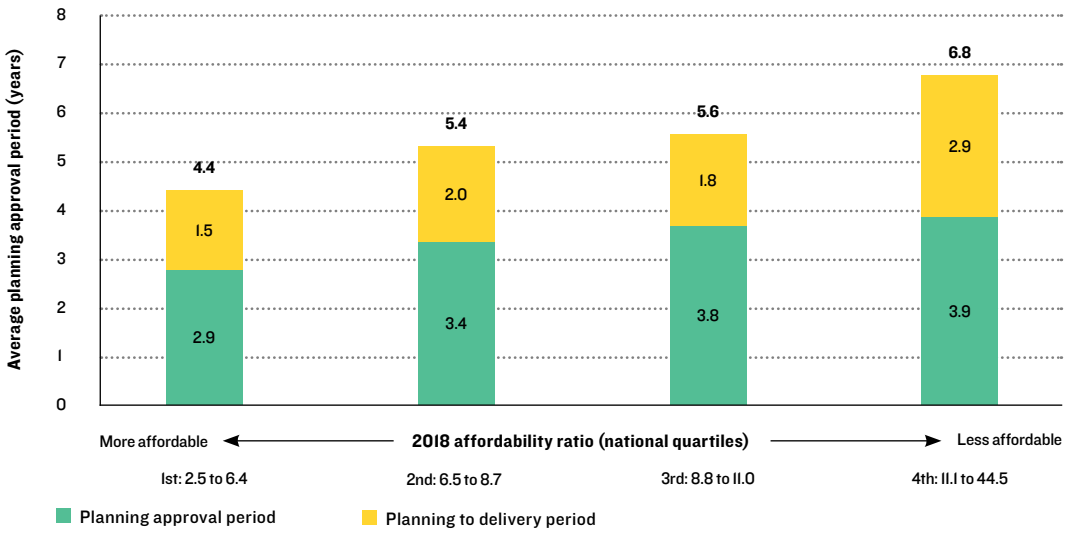
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable LPAs (with the greatest gap between workplace earnings and house prices) have examples of large schemes with an average site size of 2,000+ dwellings. It may be that the more affordable markets do not support the scale of up-front infrastructure investment that is required for larger-scale developments and which lead to longer periods before new homes can be built. However, looking at the other three quartiles, the analysis does also suggest that planning and implementation becomes more challenging in less affordable locations.

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 – 6.4	1,149
6.5 – 8.7	2,215
8.8 – 11.0	2,170
11.1 – 44.5	2,079

Source: Lichfields analysis

Figure 6: Planning approval period (years) by 2018 affordability ratio



Source: Lichfields analysis

04
How quickly do sites build out?

The rate at which new homes are built on sites is still one of the most contested matters at local plan examinations and planning inquiries which address 5YHLS and housing supply trajectories. The first edition of this research provided a range of 'real world' examples to illustrate what a typical large-scale site delivers annually. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year (the top five annual figures were between 419-620 dwellings per annum), this rate of delivery was not always sustained. Indeed, for schemes of 2,000 or more dwellings the average annual completion rate across the delivery period was 160 dwellings per annum.

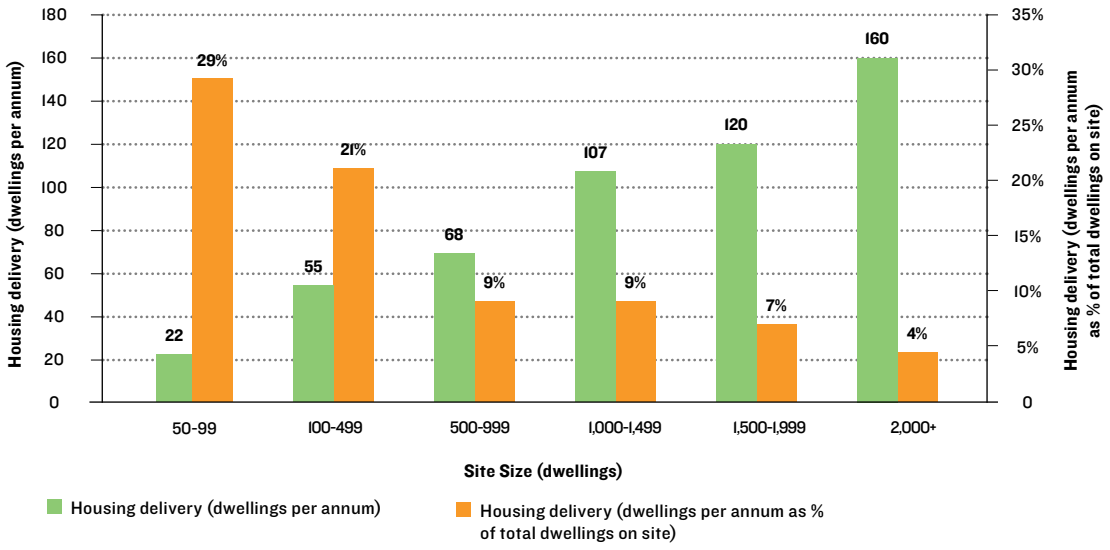
Average Annual Build-out rates

Figure 7 presents our updated results, with our additional 27 sites and the latest data for all sites considered. The analysis compares the size of site to its average annual build-out rate. Perhaps unsurprisingly, larger sites deliver on average more dwellings per year than smaller sites. The largest sites in our sample of over 2,000 dwellings, delivered on average more than twice as many dwellings per year than sites of 500-999 dwellings, which in turn delivered an average of three times as many units as sites of 1-99 units. To ensure the build-out rates averages are not unduly skewed, our analysis excludes any sites which have only just started delivering and have less than three years of data. This is because it is highly unlikely that the first annual completion figure would actually cover a whole monitoring year, and as such could distort the average when compared to only one other full year of delivery data.

160 dpa

the average annual build rate for schemes of 2,000+ dwellings

Figure 7: Build-out rate by size of site (dpa)



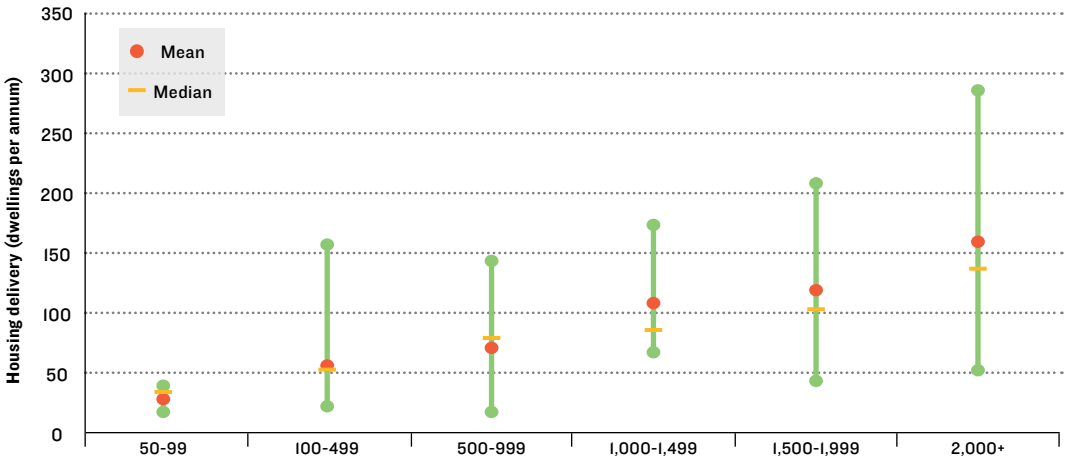
Source: Lichfields analysis

In most cases the median annual delivery rate is lower than the mean for larger sites.

We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

Our use of averages refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown in Figure 8; this reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or 'mid-point scheme'.

Figure 8: Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields analysis

Table 3: Median and mean delivery rates by site size

Site Size	Number of sites	Median housing delivery (dwellings per annum)	Median delivery as % of total on site	Mean annual delivery (dwellings per annum)	Mean annual delivery as % of total units on site
50-99	29	27	33%	22	29%
100-499	54	54	24%	55	21%
500-999	24	73	9%	68	9%
1,000-1,499	17	88	8%	107	9%
1,500-1,999	9	104	7%	120	7%
2,000+	27	137	4%	160	4%

Source: Lichfields analysis

Comparison with our 2016 findings

Comparing these findings to those in the first edition of this research, there is very little difference between the averages observed (median was not presented) for different site sizes, as set out below. The largest difference is a decrease in average annual build-out rates for sites of 1,000-1,499 dwellings, but even then, this is only a reduction of 10 dpa or 9%.

As with the first edition of the research, these are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Figure 8 shows the divergence from the average for different site size categories. This shows that whilst the average for the largest sites is 160 dpa and the median equivalent 137 dpa, the highest site average was 286 dpa and the lowest site average was 50 dpa for sites of 2,000+ dwellings. This shows the need for care in interpreting the findings of the research, there may well be specific factors that mean a specific site will build faster or slower than the average. We explore some of the factors later in this report.

Variations for individual schemes can be marked. For example, the 2,605 unit scheme South of the M4 in Wokingham delivered 419 homes in 2017/18, but this was more than double the completions in 2016/17 (174) and the average over all six years of delivery so far was just 147 dwellings per annum.

Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently delivery 300 dpa.



Site build-out rates for individual years are highly variable. For example, one scheme in Wokingham delivered more than twice as many homes in 2017/18 as it did in the year before.

Table 4: Mean delivery rates by site sizes, a comparison with first edition findings

Site size (dwellings)	2016 edition research (dpa)	2020 edition research (dpa)	Difference
50-99	27	22	-5 (-19%)
100-499	60	55	-5 (-8%)
500-999	70	68	-2 (-3%)
1,000-1,499	117	107	-10 (-9%)
1,500-1,999	129	120	-9 (-7%)
2,000+	161	160	-1 (-0.62%)

Source: Lichfields analysis

Table 5: Peak annual build-out rates compared against average annual delivery rates on those sites

Site	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne, South Cambridgeshire	4,343	620	223
Oakley Vale, Corby	3,100	520	180
Eastern Expansion Area, Milton Keynes	4,000	473	268
Clay Farm, Cambridge	2,169	467	260
South of M4, Wokingham	2,605	419	147
Cranbrook, East Devon	2,900	419	286

Source: Lichfields analysis

Table 5: Please note The Hamptons was included as an example of peak annual delivery in the first edition with one year reaching 520 completions. However, evidence for this figure is no longer available and as it was not possible to corroborate the figure it has been removed. The analysis has been updated to reflect the latest monitoring data from Peterborough City Council.

Longer term trends

This section considers the average build-out rates of sites which have been delivering over a long period of time. This is useful in terms of planning for housing trajectories in local plans when such trajectories may span an economic cycle.

In theory, sites of more than 2,000 dwellings will have the longest delivery periods. Therefore, to test long term averages we have calculated an average build-out rate for sites of 2,000+ dwellings that have ten years or more of completions data available.

For these sites, the average annual build-out rate is slightly higher than the average of all sites of that size (i.e. including those only part way through build out), at 165 dwellings per annum[6]. The median for these sites was also 165 dwellings per annum.

This indicates that higher rates of annual housing delivery on sites of this size are more likely to occur between years five and ten, i.e. after these sites have had time to 'ramp up'.

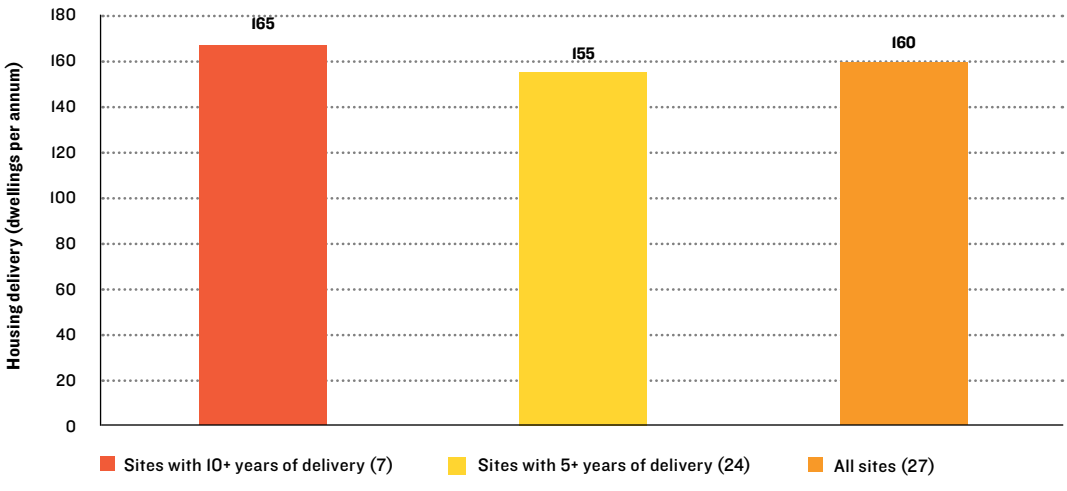
It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

It is also helpful to consider the impact of market conditions on the build-out rate of large scale housing sites. Figure 10 overleaf shows the average delivery rate of sites of 2,000 or more dwellings in five-year tranches back to 1995/96. This shows that although annual build-out rates have improved slightly since the first half of the 2010's, they remain 37% below the rates of the early 2000's. The reasons for the difference are not clear and are worthy of further exploration – there could be wider market, industry structure, financial, planning or other factors at play.

In using evidence on rates of delivery for current/historic schemes, some planning authorities have suggested that one should adjust for the fact that rates of build out may have been affected by the impact of the recession. We have therefore considered how the average rates change with and without including the period of economic downturn (2008/09 – 2012/13). This is shown in Table 6 and it reveals that average build-out rates are only slightly depressed when one includes this period, but may not have fully recovered to their pre-recession peaks. We know that whilst the recession – with the crunch on mortgage

Figure 9: Average build-out rate for sites over 2,000 homes by length of delivery period (dpa)



Source: Lichfields analysis

[6] This is based on the completions of seven examples, Chapelford Urban Village, Broadlands, Kings Hill, Oakley Vale, Cambourne, The Hamptons and Wixhams

availability – did have a big impact and led to the flow of new sites slowing, there were mechanisms put in place to help sustain the build out of existing sites.

However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.

Table 6: Impact of recession on build-out rates

	Build-out rates in all years		Build-out rates excluding recession years (2008/9-2012/13)		Build-out rates pre-recession	
	Average rate	Sample size	Average rate	Sample size	Average rate	Sample size
All large sites 500+	115	77	126	68	130	21
All large sites 2,000+	160	27	171	25	242	6
Greenfield sites 2,000+	181	14	198	12	257	3

Source: Lichfields analysis

Figure 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

05
What factors can influence build-out rates?

+34%

higher average annual build-out rates on greenfield land compared with brownfield

Having established some broad averages and how these have changed over time, we turn now to look at what factors might influence the speed at which individual sites build out. How does housing demand influence site build out? What is the impact of affordable housing? Does it matter whether the site is greenfield or brownfield? What about location and site configuration?

In demand: do homes get delivered faster in high pressure areas?

One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied.

This analysis considers whether demand for housing at the local authority level affects delivery rates by using (industry-standard) affordability ratios. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Figure 11 shows the sample of 500+ unit schemes divided into those where the local authority in which they are located is above or below the national median affordability ratio (8.72) for sites which have delivered for three years or more. This analysis shows that sites in areas of higher demand (i.e. less affordable) deliver on average more dwellings per annum.

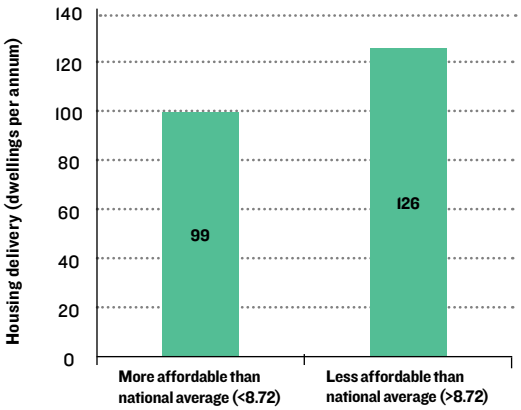
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability is greater than the national average, average site size is 2,145 dwellings. So, it is possible that the size of site – rather than affordability *per se* – is a factor here.

Do sites on greenfield land deliver more quickly?

The first edition of this research showed that greenfield sites on average delivered quicker than their brownfield counterparts. In our updated analysis this remains the case; large greenfield sites in our sample built out a third faster than large brownfield sites.

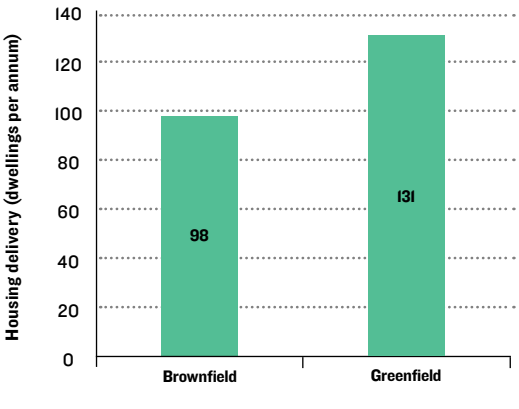
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure 11: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)



Source: Lichfields analysis

Figure 12: Build-out rates on brownfield and greenfield sites (dpa)



Source: Lichfields analysis

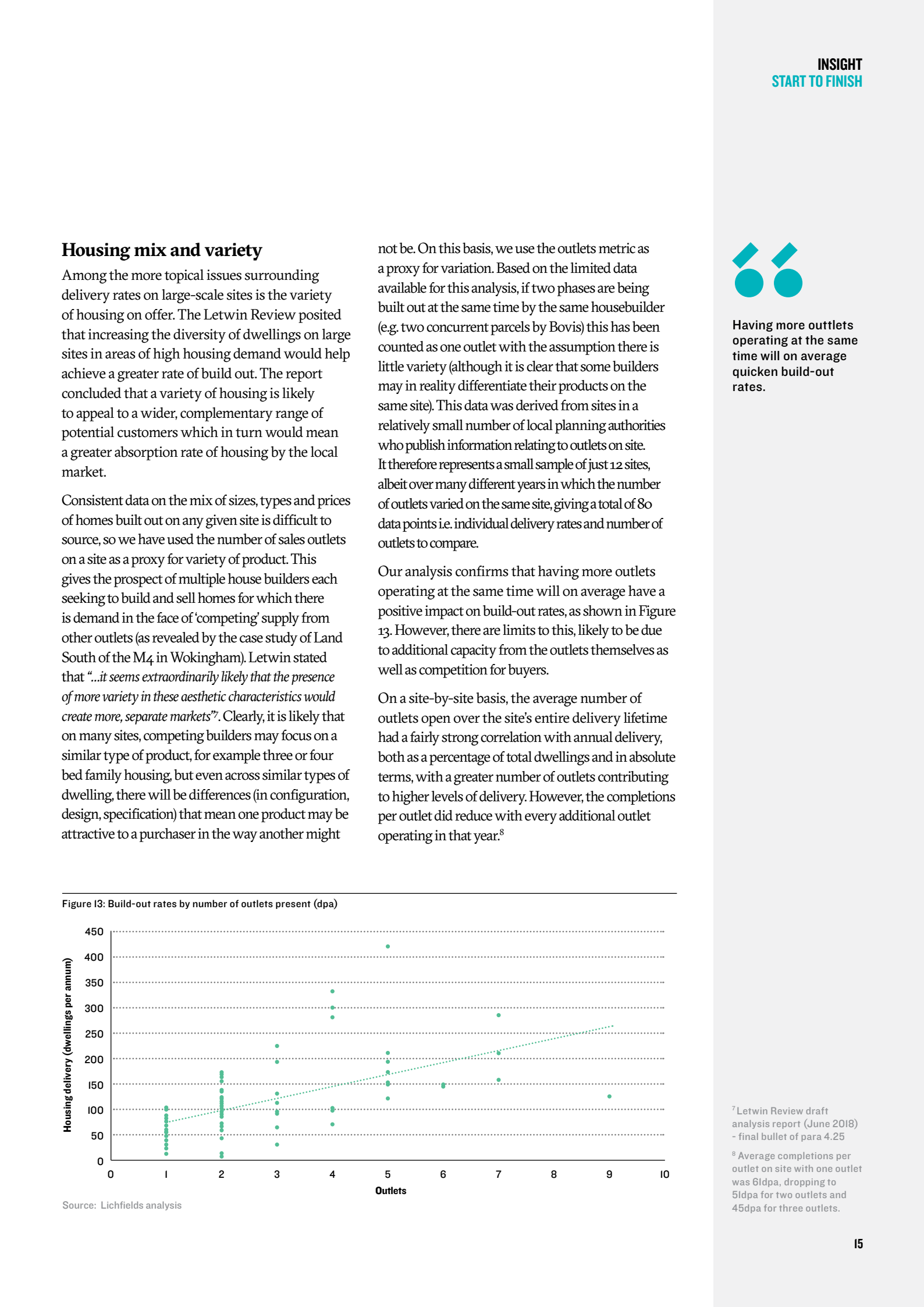
Housing mix and variety

Among the more topical issues surrounding delivery rates on large-scale sites is the variety of housing on offer. The Letwin Review posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build out. The report concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that *"...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets"*[7]. Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might not be. On this basis, we use the outlets metric as a proxy for variation. Based on the limited data available for this analysis, if two phases are being built out at the same time by the same housebuilder (e.g. two concurrent parcels by Bovis) this has been counted as one outlet with the assumption there is little variety (although it is clear that some builders may in reality differentiate their products on the same site). This data was derived from sites in a relatively small number of local planning authorities who publish information relating to outlets on site. It therefore represents a small sample of just 12 sites, albeit over many different years in which the number of outlets varied on the same site, giving a total of 80 data points i.e. individual delivery rates and number of outlets to compare.

Our analysis confirms that having more outlets operating at the same time will on average have a positive impact on build-out rates, as shown in Figure 13. However, there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers.

On a site-by-site basis, the average number of outlets open over the site's entire delivery lifetime had a fairly strong correlation with annual delivery, both as a percentage of total dwellings and in absolute terms, with a greater number of outlets contributing to higher levels of delivery. However, the completions per outlet did reduce with every additional outlet operating in that year.[8]



Having more outtlets operating at the same time will on average quicken build-out rates.

Figure 13: Build-out rates by number of outlets present (dpa)

Source: Lichfields analysis

[7] Letwin Review draft analysis report (June 2018) - final bullet of para 4.25

[8] Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

An under-explored aspect of large-scale site delivery is the physical opportunity on site. For example, some schemes lend themselves to simultaneous build out of phases which can have the impact of boosting delivery rates in that year, for example, by having access points from two alternative ends of the site. Other sites may be reliant on one key piece of infrastructure which make this opportunity less likely or impractical. In the first edition of this research we touched on this point in relation to Eastern Expansion Area (Broughton Gate & Brooklands) of Milton Keynes. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research as serviced parcels with the roads already provided were delivered as part of the Milton Keynes delivery model. Multiple house builders were able to proceed straight onto the site and commence delivery on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. In this second edition of this research the Milton Keynes examples remain some of the sites with the highest annual build-out rates.

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SP1	Bellway (1)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (1)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_1	Bloor, Bovis and Linden (3)	169
SP10	Darcliffe Homes (-)	None - parcel completed
SP11	Taylor Wimpey (1)	4

Source: Lichfields analysis

Figure 14: Map of parcels at Land South of M4, Wokingham



Source: © Google Earth 2020/ Wokingham Local Plan

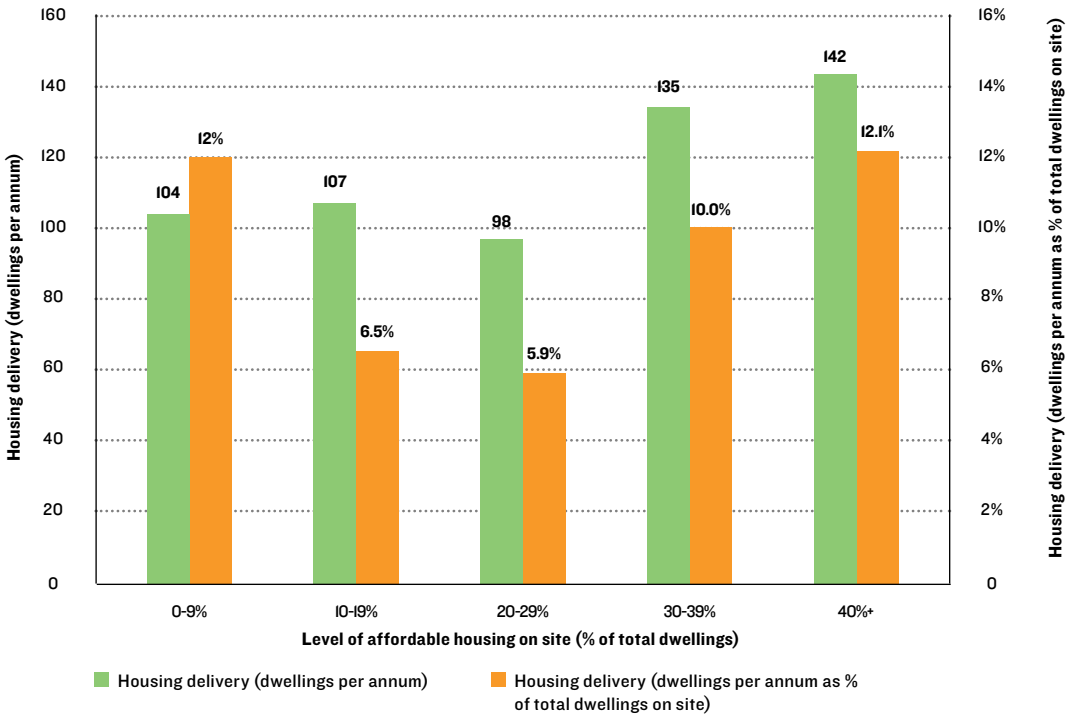
In this edition we look at the case study of Land South of the M4 in Wokingham. In 2017/18 the site achieved a significant 419 completions. Using the local authority's granular recording of delivery on the site to date, we have been able to consider where these completions were coming forward from within the wider 2,605 dwelling scheme. As shown in Figure 14, in that year new homes were completed on five separate parcels with completions ranging from 4 to 169 dwellings. On some of these parcels (SP9_1 and SP4) there were two or three separate housebuilders building out, and in total on the site there were seven different house building companies active (the impact of multiple outlets on build-out rates is explored later in this report). The parcels are located in separate parts of the site and each had their own road frontages and access arrangements which meant they are able to come forward in parallel. This can enable an increased build rate.

Affordable choices: do different tenures provide more demand?

Our findings on tenure, another form of 'variety' in terms of house building products, are informed by data that is available on about half the sites in our large site sample. From this the analysis shows schemes with more affordable housing built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all dwellings on site. However this is not always the case. Schemes with 20-29% affordable housing had the lowest build-out rates, both in terms of dwellings and proportionate to their size.

Schemes with more affordable housing built out at close to twice the rates as those with lower levels.

Figure 15: Build-out rates by level of affordable housing (dpa and percentage)



Source: Lichfields analysis

06
Conclusions

Recent changes to national planning policy emphasise the importance of having a realistic expectation of delivery on large-scale housing sites, whilst local authorities now find themselves subject to both forward and backward-looking housing delivery performance measures. A number of local plans have hit troubles because they over-estimated the yield from some of their proposed allocations. Meanwhile, it is no longer sufficient for a 5YHLS to look good on paper; the Housing Delivery Test means there are consequences if it fails to convert into homes built.

To ensure local authorities are prepared for these tests, plan making and the work involved in maintaining housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets. For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories. This research seeks to fill the gap with some benchmark figures - which can be of some assistance where there is limited or no local evidence. But the average derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different. Therefore, whilst the averages observed in this research may be a good starting point, there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the three-tier analytical framework at Figure 16.

Key findings:

1 Large schemes can take 5+ years to start

In developing a local plan, but especially in calculating a 5YHLS position, it is important to factor in a realistic planning approval period dependent on the size of the site. Our research shows that if a scheme of more than 500 dwellings has an outline permission, then the average time to deliver its first home is two or three years. However, from the date at which an outline application is validated it can be 5.0 - 8.4 years for the first home to be delivered dependent on the size of the site. In these circumstances, such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post-recession

Whilst attention and evidence gathering is often focused on how long it takes to get planning permission, the planning to delivery period from gaining permission to building the first house has also been increasing. Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors including the recession and reductions in local authority planning resources.

3 Large greenfield sites deliver quicker

Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longer-term sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites. Furthermore, large scale greenfield sites deliver at a quicker rate than their brownfield equivalents: the average rate of build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land. In most locations, a good mix of types of site will therefore be required.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build out rates, although there is not a linear relationship. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site, but those with 20-29% had the lowest rates of all. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand).

Figure I6: Key questions for assessing large site build-out rates and delivery timelines

Planning Approval

- Is the site already allocated for development? If it is in an emerging Plan, does it need to be adopted before the site can be brought forward?
- Is an SPD, masterplan or development brief required and will it help resolve key planning issues?
- Is there an extant planning permission or live planning application submitted?
- If outline permission is granted, when will reserved matters be submitted?
- Is the proposal of the promoter consistent with local policy and/or SPD/Masterplan?
- Are there significant objections to the proposal from local residents?
- Are there material objections to the proposal from statutory bodies?
- If planning permission is secured, is reserved matters approval required?

Lead In

- Does the scheme have pre-commencement conditions?
- Is the land in existing use?
- Has the land been fully assembled?
- Are there any known technical constraints that need to be resolved?
- If in multiple ownership/control, are the interests of all parties aligned?
- Is there up-front infrastructure required before new homes can be built?
- Has the viability of the proposal been established and is the feasibility consistent with known infrastructure costs and the likely rate of development?
- Does the proposal rely on access to public resources and what evidence is there on when those will be available?
- Is the scheme led by a promoter or master developer who will need to dispose of phases to a house builder before completions begin?

Build Out

- How large is the site?
- How strong is the local market?
- Does the site tap into local demand from one or more existing neighbourhoods?
- Will delivery be affected by competing sites?
- How many sales outlets will be supported by the scale, configuration and delivery model for the site?
- What is the track record of the promoter/master developer in delivery of comparable sites?
- How active are different housebuilders in the local market?
- What proportion of affordable housing is being delivered?
- Are there policy requirements for a specific mix of housing types and are there other forms of housing – such as build to rent?
- When will new infrastructure – such as schools – be provided to support the new community?
- Are there trigger points or phasing issues that may affect the build-out rate achievable in different phases?

Appendices

Contents

Appendix 1: Definitions and notes 22
Appendix 2: Large sites tables and sources for sites also found in the Letwin Review 23
Appendix 3: Small sites tables 28

Appendix 1: Definitions and notes

The 'lead in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time does also include the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

Includes the discharge of any pre-commencement and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the 'first housing completion'

On site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMR's) and other planning evidence base documents produced by local authorities (see footnote 1), contacting the local planning authority monitoring officers or planners and in a handful of instances obtaining the information from housebuilders.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the age of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for the vast majority of sites. And because not all of the sites assessed have commenced housing delivery, build-out rate information is not universal. The results are presented accordingly.

Appendix 2: Large sites tables

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Ebbsfleet	Gravesham/ Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312													
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	
Rugby Radio Station	Rugby	6,200	N/A																						
East of Kettering	Kettering	5,500	2016/17	43	93																				
Sherford	Plymouth	5,500	2016/17	7	106																				
Priors Hall	Corby	5,200	2011/12	56	21	59	87	170	155	273															
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	60	57													
Monkton Heathfield	Taunton Deane	4,500	2012/13	22	76	220	191	222	148																
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47												
Cambourne	South Cambridgeshire	4,343	1999/2000	42	361	213	337	620	151	377	267	219	190	162	206	154	151	129	239	201	95	126			
Eastern Expansion Area (Broughton Gate & Brooklands)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138																
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86															
Stanton Cross	Wellingborough	3,650	N/A																						
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262																			
Northampton North SUE	Daventry	3,500	2017/18	50																					
Great Western Park	South Oxfordshire	3,300	2011/12	110	204	232	392	237	274	78															
Oakley Vale	Corby	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	96	103	51	40	9	70					
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31
North West Cambridge	Cambridge and South Cambridgeshire	3,000	2016/17	73																					
West of Waterloo	Havant and Winchester	3,000	2009/10	38	71	30	82	112	135	196	241														
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	93														
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419																
Winterstoke Village	North Somerset	2,550	2014/15	132	185	242	161																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	197	318	280																		

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Land East Icknield Way	Test Valley	2,500	2009/10	184	257	103	181	135	229	146	184														
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118																	
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154														
Broadlands	Bridgend	2,309	1999/2000	288	331	307	193	204	156	64	104	91	28	81	50	147	11								
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45															
Arborfield Garrison	Wokingham	2,225	2016/17	57	114																				
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168														
Clay Farm/ Showground Site (Great Kneighton)	Cambridge	2,169	2012/13	16	265	399	153	467																	
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90																				
Graven Hill	Cherwell	1,900	2016/17	1	28																				
Elvetham Heath	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6													
Hunts Grove	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22														
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96	
Red Lodge	Forest Heath	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111								
South West Bicester (Phase 1 Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86									
Parc Derwen	Bridgend	1,500	2010/11	8	103	134	201	199	197	157	186														
Jennet's Park	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28											
Melton Road	Rushcliffe	1,500	2016/17	40	126																				
Great Denham	Bedford	1,450	data only avalibale from 2009/10	92	150	159	71	122	150	125	211	168													
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85													
South Maldon Garden Suburb	Malden	1,428	2017/18	1																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Bolnore Village	Mid Sussex	1,358	2012/13	30	54	88	73	36	124																
Park Prewett Hospital	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16			
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90									
Oxley Park (East & West)	Milton Keynes	1,300	2004/05	52	166	295	202	115	91	75	163														
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24														
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101										
Staynor Hall	Selby	1,200	2005/06	12	141	115	10	43	62	46	59	79	162	79	34	50									
Picket Twenty	Test Valley	1,200	2011/12	147	178	180	176	164	145	175															
Trumpington Meadows	Cambridge and South Cambridgeshire	1,200	2012/13	141	143	67	100	94																	
Broughton (Broughton & Atterbury)	Milton Keynes	1,200	2003/04	114	105	170	409	204	180	18															
Orchard Park	Cambridge	1,120	2006/07	100	290	148	103	95	56	34	15	75	39	30	2										
Velmead Farm	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4									
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15																					
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116																		
Highfields Farm	South Derbyshire	1,056	2016/17	141	204																				
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122																	
Northampton North of Whitehills SUE	Daventry	1,000	2016/17	108	100																				
Taylors Farm/Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12									
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	96																
Little Staniton	Corby	970	2009/10	106	116	74	121	102	93	89	86	26													
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60												
Ingress Park	Dartford	950	2002/03	184		275	100	74	0	119	0	0													
Nar Ouse Millenium Commuity	Kings Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0											
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42								
South Bradwell	Great Yarmouth	850	2015/16	60.3	60.3	60.3																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Prospect Place	Cardiff	826	2007/08	185	48	0	0	0	0	0	76	170													
Abbotswood	Test Valley	800	2011/12	30	190	157	114	152	90	20															
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30												
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																
Hungate	York	720	2009/10	90	52	11	9	7			187	8													
Northside	Gateshead	718	1999/2000	46.8	46.8	46.8	46.8	46.8	56	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43					
Land at West Blyth	Northumbeland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90												
Rowner Renewal Project	Gosport	700	2010/11	4	100	70	45	89	101	79	97														
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110																			
The Parks, formally Staff College	Bracknell Forest	697	2006/07	-94	104	88	101	54	47	72	59	94	78												
Staiths South Bank	Gateshead	667	2003/04	24	58		44		48																
Land south of Wansbeck General Hospital	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54									
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5																		
Ochre Yards	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2			46	4	52	2										
Former Runwell Hospital	Chelmsford	575	2016/17	91	90																				
Land adjoining Manchester Ship Canal	Trafford	550	N/A																						
Pamona Docks	Trafford	546	N/A																						
Thingwall Lane	Knowlsey	525	2013/14	79																					
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	14	13	18	15								
University Campus Chelmsford	Chelmsford	507	2014/15	216	3																				
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																	
Land West of Copthorne	Mid Sussex	500	N/A																						

Sources for sites also found in the Letwin Review

Arborfield Green (Arborfield Garrison)		Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/
Ledsham Garden Village		Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/
Great Kneighton (Clay Farm)		Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports
Trumpington Meadows		Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries) https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/
Graven Hill		Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
South West Bicester (Kingsmere Phase I)		Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
Great Western Park		Housing Land Supply Statement April 2018 http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf
Ebbsfleet:		First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13
	2009-10:	127 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf
	2010-11:	79 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf
	2011-12:	55 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf
	2012-13:	50 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf
	2013/14:	87 dwellings, based on total completions form Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.
	2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/

Appendix 3: Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Horfield Estate Phase I	Bristol City Council	485
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery	Wigan	471
Farington Park, east of Wheelton Lane	South Ribble	468
Bleach Green	Gateshead	456
Kingsmead South	Milton Keynes Council	450
New Central	Woking Borough Council	445
Land at former Battle Hospital	Reading Borough Council	434
New World House	Warrington	426
Radyr Sidings	Cardiff	421
Luneside West	Lancaster	403
Woolley Edge Park	Wakefield	375
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365
Former NCB Workshops (Portland Park)	Northumberland	357
Chatham Street Car Park Complex	Reading	307
Kennet Island Phase I - H, M, T, UI, U2	Reading	303
Land at Dorian Road	Bristol, City of	300
Land at Fire Service College, London Road	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Long Marston Storage Depot Phase I	Stratford-on-Avon	284
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273
Land at Canons Marsh	Bristol, City of	272
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417	Cotswold	270
Hortham Hospital	South Gloucestershire	270
GCHQ Oakley - Phase I	Cheltenham	262
Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hoval Ltd North Gate	Newark and Sherwood	196
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Sellars Farm	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176
Queen Mary School	Fylde	169
London Road/ Adj. St Francis Close	East Hertfordshire	149
Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
North of Douglas Road	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	130
Land to the rear of Mount Pleasant	Cheshire West and Chester	127
Primrose Mill Site	Ribble Valley	126
Kennet Island Phase 1B - E, F, O & Q	Reading	125
Land between Godsey Lane and Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Land west of Birchwood Road	Bristol, City of	119
Former Bewbush Leisure Centre Site	Crawley	112
Land south of Station Road	East Hertfordshire	111
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4 Gloucester Business Park	Tewkesbury	94
York Road	Hambleton	93
Land At Green Road - Reading College	Reading	93
Caistor Road	West Lindsey	89
The Kylins	Northumberland	88
North East Area Professional Centre, Furnace Drive	Crawley	76
Land at Willoughbys Bank	Northumberland	76
Watermead, Land At Kennel Lane	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site)	West Lindsey	69
Land off Crown Lane	Wychavon	68
Former Wensleydale School	Northumberland	68
Land at Lintham Drive	South Gloucestershire	68
Springfield Road	South Kesteven	67
Land off Cirencester Rd	Stroud	66
Land south of Pinchington Lane	West Berkshire	64
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School	Cherwell	60
Land at the Beacon, Tilford Road	Waverley	59
Land to Rear Of 28 - 34 Bedale Road	Hambleton	59
Hanwell Fields Development	Cherwell	59
Fenton Grange	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm, Carleton Road	Wakefield	50
Land off Elizabeth Close	West Lindsey	50

The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

Read more

You can read more of our research and insight at **lichfields.uk**

Our bespoke products, services and insights



How does your garden grow?

A stock take on planning for the Government's Garden Communities programme



Garden Communities

Unlocking the potential of new settlements and urban extensions



Headroom

Objective assessments of local housing needs



Sizemix

Securing the right mix in residential development proposals

Contacts

Speak to your local office or visit our website.



Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no.2778116. © Nathaniel Lichfield & Partners Ltd 2020. All rights reserved.

LAND WEST OF USK ROAD, PENPERLLENI, MONMOUTHSHIRE, SOUTH WALES

Landscape and Visual Appraisal



JSL3528_171
Land West of Usk Road,
Penperlleni, Monmouthshire
V3
August 2021

rpsgroup.com

Quality Management

Version	Status	Authored by	Reviewed by	Approved by	Review date
V1	First Draft	GL	JB	CT	July 2021
V2	Final	GL	Client	CT	Aug. 2021
V3	Final	GL	Client	CT	Aug. 2021

Approval for issue

	CT	20 August 2021

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.
The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

George Lilley
Senior Landscape Architect

Lakesbury House, Hiltingbury Road, Chandlers Ford,
SO53 5SS

[redacted]

Prepared for:

Barratt and David Wilson Homes (South Wales)

Contents

1 INTRODUCTION 1
2 PLANNING POLICY CONTEXT 2
3 ASSESSMENT METHODOLGY AND SIGNIFICANCE CRITERIA 7
4 BASELINE CONDITIONS 14
5 PROPOSED DEVELOPMENT 28
6 APPRAISAL OF EFFECTS 30
7 SUMMARY 41

Figures

Figure 1: Site Location and Landscape Planning Designations
Figure 2: Topography and Drainage
Figure 3: ZTV (including Representative Viewpoint Locations)
Figure 4.1-4.7: Representative Viewpoints
Figure 5: National Landscape Character Areas (NLCAs)
Figure 6: Local Landscape Character Areas (LLCAs)
Figure 7: LANDMAP Visual and Sensory Aspect Areas
Figure 8: LANDMAP Visual and Sensory Aspect Areas Overall Evaluation
Figure 9: LANDMAP Geology Aspect Areas
Figure 10: LANDMAP Landscape Habitat Aspect Areas
Figure 11: LANDMAP Historic Landscape Aspect Areas
Figure 12: LANDMAP Cultural Landscape Aspect Areas

Appendices

Appendix A: Opportunities and Concept Plan (ref. 0711-1001-V2, Focus on Design, August 2021)

Appendix B: Representative Viewpoints (contextual panoramas)

Appendix C: LANDMAP Evaluation of Aspect Areas (within local Landscape Character Area PE02).

1 INTRODUCTION

1.1 RPS has been commissioned by Barratt and David Wilson Homes (South Wales) to prepare an appraisal of the potential landscape and visual effects that would result from a proposed development, located on an area of land to the west of Usk Road, Penperlleni, Monmouthshire Located to the western edge of the village of Penperlleni, the site is bound to the south of Park-Y-Brain Lane and to the west of the Usk Road. It is hereinafter referred to as the 'Candidate Site'. The appraisal forms part of the Stage 2 Call for Sites submission to Monmouthshire County Council (MCC). The site is identified as a Candidate Site (ref. CS/0179), as derived from the Monmouthshire Local Development Plan Review.

1.2 The purpose of this report is to identify and assess the potential landscape and visual effects which would result from the proposed development of approximately 85, 1 and 2 to 2.5 storey, detached and semidetached residential properties on a developable area of 2.98 Hectares (Ha) (7.36 acres) at 30 dwellings per hectare (DPH), associated infrastructure and landscape proposals within approximately 4.3Ha on land to the west of Usk Road, Penperlleni, Monmouthshire.

1.3 The Candidate Site, to the north, comprises two open small to medium pastural fields bordered by scattered trees and hedgerows to most boundaries. To the south, adjacent to 'Lyndhurst', is an area of pasture / open grassland with generally more open boundaries to the west with scattered trees and partially open boundary to the south around 'Lyndhurst' with a more mature hedgerow to the south east corner adjoining Usk Road boundary hedgerow. There is some topographical variation within the Candidate Site, including a distinctive ridgeline evident to its centre, a noticeable hollow towards the south east corner, adjacent to Usk Road, and the remainder of the site is generally slightly elevated. The site is partially contained by field boundary hedgerows, particularly to its eastern and northern boundary and internal hedgerows, although the remainder of the site is generally open, emphasised by the higher parts of the site at the border with Park Y Brain Lane to the north. There is no existing development within the site itself, with residential / commercial development to the immediate north east corner. The Candidate Site is separated from other local development, though still heavily influenced by it, by the busy A4042 Usk Road to the east and Park Y Brain Lane to the north.

1.4 There is no public access to the Candidate Site. The location of the Candidate Site and its context, and relevant planning designations within the study area are shown on Figure 1. The Landscape and Visual Appraisal (LVA) forms part of a second candidate site submission to Monmouthshire County Council.

2 PLANNING POLICY CONTEXT

Introduction

2.1 The following section identifies the national and local planning policies of relevance to landscape and visual matters, which have informed the existing baseline of the Candidate Site and surrounding landscape and informed the subsequent landscape and visual appraisal of the proposed development. The aims of the various policies, at national, county and local level, are summarised below.

Planning Policy Guidance

Planning Policy Context

2.2 As part of establishing the existing baseline environment, this appraisal has considered relevant planning policies in the currently adopted Local Development Plan (Table 2.1). Other documents, of material consideration, are reviewed in paragraphs 2.6 to 2.9.

Local Development Plan

2.3 The Development Plan for the Candidate Site comprises the Monmouthshire Local Development Plan 2011 - 2021 (adopted on the 27th February 2014). Relevant policies to the proposed development within the Monmouthshire Local Development Plan are described below.

Monmouthshire Local Development Plan

2.4 The Monmouthshire Local Development Plan was adopted on the 27th February 2014 and sets out the overall planning strategy for the Council from 2011-2021. Completed in accordance with National Planning Policy and Guidance. *'The LDP sets out the Council's vision and objectives for the development and use of land in Monmouthshire, together with the policies and proposals to implement them over a 10-year period to 2021. The plan area excludes that part of the County contained within the Brecon Beacons National Park'*.

Table 2.1 Monmouthshire Local Development Plan Policies

Plan Policy	Details
Strategic Planning Policies	
Policy S1: Spatial Distribution of New Residential Development	*The main focus for new housing development is within or adjoining the Main Towns of:* *• Abergavenny, Chepstow and Monmouth.* *…The Rural Secondary Settlements are Usk, Raglan, Penperlleni and Llanfoist. A small amount of new housing development is directed to the Rural Secondary Settlements of Usk, Raglan and Penperlleni…*
Policy S13: Landscape, Green Infrastructure and the Natural Environment	*Development proposals must:* *1. Maintain the character and quality of the landscape by:* *(i) identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;* *(ii) protecting areas subject to international and national landscape designations;*

Plan Policy	Details
	(iii) preserving local distinctiveness, sense of place and setting; *(iv) respecting and conserving specific landscape features, such as hedges, trees and ponds;* *(v) protecting existing key landscape views and vistas.* *2. Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure network.* *3. Protect, positively manage and enhance biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them.* *4. 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.*
Policy S17: Place Making and Design	*Development shall contribute to creating high quality, attractive and sustainable places. All development proposals must include and promote high quality, sustainable inclusive design which respects local distinctiveness, respects the character of the site and its surrounding in order to protect and enhance the natural, historic and built environments and to create attractive, safe and accessible places.*
Development Management Policies	
Policy DES1: General Design Considerations	*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:* *a) ensure a safe, secure, pleasant and convenient environment that is accessible to all members of the community, supports the principles of community safety and encourages walking and cycling;* *b) contribute towards sense of place whilst ensuring that the amount of development and its intensity is compatible with existing uses;* *c) respect the existing form, scale, siting, massing, materials and layout of its setting and any neighbouring quality buildings;* *d) maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties, where applicable;* *e) respect built and natural views and panoramas where they include historical features and / or attractive or distinctive built environment or landscape;* *f) use building techniques, decoration, styles and lighting to enhance the appearance of the proposal having regard to texture, colour, pattern, durability and craftsmanship in the use of materials;* *g) incorporate and, where possible enhance existing features that are of historical, visual or nature conservation value and use the vernacular tradition where appropriate;* *h) include landscape proposals for new buildings and land uses in order that they integrate into their surroundings, taking into account the appearance of the existing landscape and its intrinsic character, as defined through the LANDMAP process. Landscaping should take into account, and where appropriate retain, existing trees and hedgerows;* *i) make the most efficient use of land compatible with the above criteria, including that the minimum net density of residential development should be 30 dwellings per hectare, subject to criterion l) below ;* *j) achieve a climate responsive and resource efficient design. Consideration should be given to location, orientation, density, layout, built form and landscaping and to energy efficiency and the use of renewable energy, including materials and technology;* *k) foster inclusive design;*

Plan Policy	Details
	l) ensure that existing residential areas characterised by high standards of privacy and spaciousness are protected from overdevelopment and insensitive or inappropriate infilling.
Policy LC3: Brecon Beacons National Park	*Development in the vicinity of the Brecon Beacons National Park will only be permitted where it would:* *a) preserve or enhance the landscape setting, as defined through the LANDMAP process;* *b) have no serious adverse effect on significant views into and out of the National Park.* *Development that would cause unacceptable harm to the qualities that justify the designation of the Brecon Beacons National Park or its setting will not be permitted.*
Policy LC5: Protection and Enhancement of Landscape Character	*Development proposals that would impact upon landscape character, as defined by LANDMAP Landscape Character Assessment, 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 by:* *a) Causing significant visual intrusion;* *b) Causing significant adverse change in the character of the built or natural landscape;* *c) Being insensitively and unsympathetically sited within the landscape;* *d) Introducing or intensifying a use which is incompatible with its location;* *e) Failing to harmonise with, or enhance the landform and landscape; and /or* *f) Losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes of both the built and natural environment.* *Particular emphasis will be given to those landscapes identified through the LANDMAP Landscape Character Assessment as being of high and outstanding quality because of a certain landscape quality or combination of qualities.*
Policy GI1: Green Infrastructure	*Development proposals will be expected to maintain, protect and enhance Monmouthshire's diverse green infrastructure network by:* *a) Ensuring that individual green assets are retained wherever possible and integrated into new development. Where loss of green infrastructure is unavoidable in order to secure sustainable development appropriate mitigation and/or compensation of the lost assets will be required;* *b) Incorporating new and /or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off-site.*
Policy NE1: Nature Conservation and Development	*Development proposals that would have a significant adverse effect on a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or on the continued viability of priority habitats and species, as identified in the UK or Local Biodiversity Action Plans or Section 42 list of species and habitats of importance for conservation of biological diversity in Wales, will only be permitted where:* *a) the need for the development clearly outweighs the nature conservation or geological importance of the site; and* *b) it can be demonstrated that the development cannot reasonably be located elsewhere.*

Plan Policy	Details
	Where development is permitted, it will be expected that any unavoidable harm is minimised by effective avoidance measures and mitigation. Where this is not feasible appropriate provision for compensatory habitats and features of equal or greater quality and quantity must be provided. *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.* *Development proposals shall accord with nature conservation interests and will be expected to:* *i) Retain, and where appropriate enhance, existing semi-natural habitats, linear habitat features, other features of nature conservation interest and geological features and safeguard them during construction work;* *ii) Incorporate appropriate native vegetation in any landscaping or planting scheme, except where special requirements in terms of purpose or location may dictate otherwise;* *iii) Ensure the protection and enhancement of wildlife and landscape resources by appropriate building design, site layouts, landscaping techniques and choice of plant species;* *iv) Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests.*

Site Allocation

2.5 The Candidate Site itself is not currently allocated, however, as part of the current Monmouthshire Local Development Plan Review it has been submitted as a Candidate Site (Ref. CS0179).

Other Material Considerations

Planning Policy Wales (Edition 11, 2021)

2.6 Edition 11 of the Planning Policy Wales (PPW) was published in February 2021 by the National Assembly for Wales, replacing all previous versions, as part of National Planning Policy and guidance.

2.7 The PPW sets out the land use planning policies of the Welsh Government. The conservation and improvement of the natural heritage of Wales is one of its objectives noting the following (paragraph 6.02 and 6.03):

"The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.

As well as those characteristics regarded as special or unique there are other, environmental qualities of places which are ubiquitous. Environmental components of places, such as clean air, access to open spaces and water quality, are linked to the quality of the built and natural environment. The environmental components of places influence and shape health and wellbeing as well as playing a role in sustaining and creating places which are adaptable and resilient to change. Distinctive and Natural places must maintain or incorporate green infrastructure, recognising the wide-ranging role it can play, as key components of their natural and built fabric. Doing so will maximise health and well-being of communities and the environment.".

2.8 It also attaches considerable importance to the benefits of good design stating (paragraph 3.10) that:

"In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness. In those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important."

Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)

2.9 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. This guidance note should be read in conjunction with Planning Policy Wales Edition 11, in particular with Chapter 6: Distinctive and Natural Places, which considers matters including landscaping (Page 133).

Summary of Planning Policy

2.10 The Monmouthshire Local Development Plan incorporates strategies to conserve and enhance (where possible) the important features, elements and characteristics of the rural landscape by avoiding visually intrusive development and promoting good quality design which incorporates appropriate green infrastructure.

2.11 The Candidate Site, although not allocated within the currently adopted Monmouthshire LDP, has been submitted as a Candidate Site as part of the Replacement of the LDP.

2.12 The PPW sets out overarching aims to ensure development is appropriately located, well designed and sustainable. In summary, the policies set out to improve the overall quality of an area, establish a strong sense of place and create an attractive and comfortable location, responding to local character.

3 ASSESSMENT METHODOLGY AND SIGNIFICANCE CRITERIA

General

3.1 **T**he Landscape and Visual Appraisal considers the potential effects of the development upon:

- Landscape character in general;
- Individual characteristics, elements and features in the landscape; and,
- Visual amenity of people who view the proposed development.

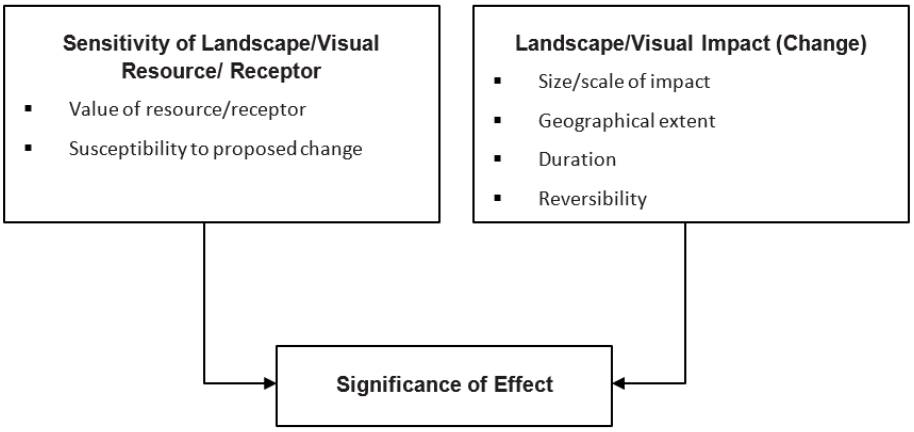
Distinction Between Landscape and Visual Effects

3.2 As set out in the *Guidelines for Landscape and Visual Impact Assessment: Third Edition*, 2013 (Landscape Institute and Institute of Environmental Management and Assessment) (GLVIA3) landscape and visual effects have been assessed separately, although the procedure for assessing each of these is closely linked. A clear distinction is drawn between landscape and visual effects as described below:

- Landscape effects relate to the effects of the project on the physical and other characteristics of the landscape and its resulting character and quality.
- Visual effects relate to the effects on views experienced by visual receptors (e.g. residents, footpath users, tourists etc.) and on the visual amenity experienced by those people.

3.3 The likely landscape and visual effects of the proposed development have been assessed by considering the change that would result from it against the sensitivity of the landscape resource or visual receptor as outlined in the diagram below.

Diagram 7.1: Assessment Process Summary



3.4 These factors are determined by a combination of quantitative (objective) and qualitative (subjective) appraisal using professional judgement. Magnitude of change (impact) and resource and receptor sensitivity are described in the paragraphs below. Landscape and Visual effects can be beneficial (positive) or neutral as well as adverse (negative).

3.5 The assessment has been carried out for the operational phase of the proposed development and has considered potential day-time effects during this phase. Fieldwork was undertaken during winter (February 2020) when existing deciduous vegetation was without leaf. The assessment of potential landscape and visual effects is based upon that at completion during winter Year 1 and during summer Year 1**5** when landscape planting has had time to mature and would have

achieved its intended design function. Due to the timing of site work, the assessment of potential landscape and visual effects at summer Year 15 has been necessarily completed based on professional experience and judgement.

Appraisal Criteria and Significance of Effects

3.6 The purpose of the appraisal is to evaluate the magnitude of change (impact) to landscape and visual resources and receptors to enable the likely key effects of the project to be identified.

3.7 Published guidance states that the level of effects is ascertained by professional judgement based on consideration of the sensitivity of the baseline landscape or visual receptor and the magnitude of change as a result of the project.

Sensitivity of Landscape Resource

3.8 The sensitivity of a landscape receptor is a combination of "*judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape*" (GLVIA3, para 5.39). For the purpose of this appraisal, susceptibility and value of landscape receptors are defined as follows:

- Landscape susceptibility: *"the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed change without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies"* (GLVIA3, para 5.40).
- Value of the landscape receptor: *"The value of the Landscape Character Types or Areas that may be affected, based on review of designations at both national and local levels, and, where there are no designations, judgements based on criteria that can be used to establish landscape value; and, the value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particularly landscape features, notable aesthetic, perceptual or experiential qualities, and combinations of these contributors"* (GLVIA3, para 5.44).

Resource Value

3.9 The value of certain landscapes is nationally recognised and designated, e.g. Area of Outstanding Natural Beauty (AONB). Some landscapes are locally designated e.g. Area of Great Landscape Value.

3.10 Other landscapes are undesignated but valued locally for specific reasons or specific elements/features or perceptual qualities. The value of an area of landscape is expressed both through designation and also other criteria, such as tranquillity, remoteness, wildness, scenic beauty, cultural associations, conservation interests, public and amenity/tourism uses (GLVIA3 Box 5.1).

Sensitivity of Visual Receptors

3.11 Visual receptors are always people. The sensitivity of each visual receptor (the particular person or group of people likely to be affected at a specific viewpoint) "*should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views*" (GLVIA, para 6.31). For the purpose of this appraisal, susceptibility and value of visual receptors are defined as follows:

- Visual susceptibility: "The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of: The occupation or activity of people experiencing views

at the particular locations; and, the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations" (GLVIA3, para 6.32).

- Value of views: Judgements made about the value of views should take account of: "recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations; and, indicators of value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment (such as parking places, sign boards or interpretive material) and references to them in literature or art…" (GLVIA3, para 6.37).

3.12 Sensitivity is not readily graded in bands and GLVIA3 notes, with regards to visual sensitivity, that the division of who may or may not be sensitive to a particular change "*is not black and white and in reality, there will be a gradation in susceptibility to change*" (GLVIA3, para 6.35). In order to provide both consistency and transparency to the appraisal process, Table 2 defines the criteria which have guided the judgement as to the intrinsic susceptibility and value of the resource/receptor and subsequent sensitivity to the proposed development. In all cases, the sensitivity has been informed by professional judgement.

Table 3.1: Sensitivity of receptor

Sensitivity	Landscape resource/receptor	Visual receptor
Low	Landscape value is low, with no designations; landscape is in a poor condition and a degraded character with the presence of detractors such as industrial units; and the landscape has the capacity to potentially accommodate significant change.	May include people at their place of work, or engaged in similar activities, whose attention may be focussed on their work or activity and who may therefore be potentially less susceptible to changes in view. Occupiers of vehicles whose attention may be focused on the road.
Medium	Landscape value is recognised or designated locally; the landscape is relatively intact, with a distinctive character and few detractors; and is reasonably tolerant of change.	Viewers' attention may be focused on landscape; such as users of secondary footpaths, and people engaged in outdoor sport or recreation (e.g. horse riders using gallops).
High	Landscape value recognised by existing or proposed national designation. The qualities for which the landscape is valued are in a good condition, with a clearly apparent distinctive character and absence of detractors. This distinctive character is susceptible to relatively small changes.	Large number or high sensitivity of viewers assumed. Viewers' attention very likely to be focused on landscape. e.g. residents experiencing views from dwellings; users of strategic recreational footpaths and cycle ways; people experiencing views from important landscape features of physical, cultural or historic interest, beauty spots and picnic areas.

Magnitude of Impact on Landscape Resources and Receptors

3.13 The magnitude of impact or change affecting landscape receptors depends on the size or scale, geographical extent of the area influenced and its duration and reversibility. These factors are described below:

- Size or scale: *"The extent of the existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to the character of the landscape…; the degree to which aesthetic or perceptual aspects of the landscape are*

altered either by removal of existing components of the landscape or by addition of new ones… ; and, "whether the effect [impact] changes the key characteristics of the landscape, which are critical to its distinctive character" (GLVIA3, para 5.49).

- Geographical extent: Distinct from scale or size, this factor considers the geographical area over which the landscape impacts will be felt, it might, for example, be a moderate loss of landscape receptors or character over a large area, or a large loss of receptors or character over a very localised area. At para 5.50 GLVIA3 notes that *"in general effects [impacts] may have an influence at the following scales, although this will vary according to the nature of the project and not all may be relevant on every occasion: at the site level within the development site itself; at the level of the immediate setting of the site; at the scale of the landscape type or character area within which the proposal lies; and, on a larger scale, influencing several landscape types or character areas."* For the purposes of this appraisal, the assessment considers the impact of the proposed development on the published landscape character areas and units, both at county and national level, i.e. the third and fourth landscape scales.
- Duration and reversibility: Duration is categorised as short, medium or long-term. GLVIA3 explains that as there are no standard lengths of time within these categories, the assessment must state what these are and why these have been chosen (GLVIA3, para 5.51). Reversibility is described *as "a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation"* (GLVIA3, para 5.52). Projects are considered to be permanent (irreversible), partially reversible or fully reversible. For the purposes of this appraisal the proposed development is considered to be permanent.

Magnitude of Impact on Visual Receptors

3.14 As with the magnitude of landscape impacts, the magnitude of impact or change affecting visual receptors depends on the size or scale, geographical extent of the area influenced and its duration and reversibility. These factors are described below:

- Size or scale: Judgements need to take account of: *"the scale of the change [impact] in the view with respect to the loss or addition of features in the view and changes in its composition, including the proportion of the view occupied by the proposed development; the degree of contrast or integration of any new features or changes in the landscape with existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture; and, the nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses"* (GLVIA3, para 6.39).
- Geographical extent: This will vary from viewpoint to viewpoint and will reflect*: "the angle [orientation] of view in relation to the main activity of the receptor; the distance of the viewpoint from the proposed development; and, the extent of the area over which the changes [impact] would be visible"* (GLVIA3, para 6.40).
- Duration and reversibility of visual effects: As with landscape impacts, duration should be categorised as short, medium or long-term and projects considered to be permanent (irreversible), partially reversible or fully reversible (GLVIA3, para 6.41). For the purposes of this assessment the impacts on views of the development are considered to be permanent.

Table 3.2: Magnitude of impact

Magnitude	Landscape impacts	Visual impacts
Negligible	The impact of change on the perception of the landscape, the physical features or the character is barely discernible.	The character of the view will not be altered by the proposed development. The proposed development is at such a distance or is heavily screened so as to be barely perceptible and may only be visible in clear conditions. May go unnoticed.
Small	Changes to the physical landscape, its character and the perception of the landscape are slight. Long distance to affected landscape with views toward the character area/type.	Visible, but not prominent. Minor component and no marked effect on view.
Medium	The proposed development forms a visible and recognisable feature in the landscape. Proposed development is within or adjacent to affected character area/type. Scale of development fits with existing features.	Prominent. Has an important, but not defining influence on view; is a key element in the view.
Large	Where there are substantial changes affecting the character of the landscape, or important elements. Proposed development within or close to affected landscape. Size of development out of scale with existing elements.	Dominant. Has a defining influence on the view.

Significance of effect

3.15 The significance of the landscape and visual effects are assessed through consideration of the sensitivity of the receptor and the magnitude of change. The following table outlines the broad approach adopted to assess the level of effect, together with professional judgement. This may lead some effects to fall between two categories.

Table 3.4: Significance of effect

Landscape and visual sensitivity	Magnitude of change			
	Large	**Medium**	**Small**	**Negligible**
High	Major	Major or Moderate	Moderate or Minor	Minor or Negligible
Medium	Major or Moderate	Moderate	Minor	Minor or Negligible
Low	Moderate or Minor	Minor	Minor or Negligible	Negligible

3.16 The significance effect of relevant aspects of the project on the landscape has been described and evaluated against the following criteria, as set out in Table 3.5 below:

Table 3.5: Significance of landscape effects

Significance of effect	Definition (landscape resource/receptor)
Major adverse	Where the proposed changes cannot be fully mitigated; would be uncharacteristic and would damage a valued aspect of the landscape.
Moderate adverse	Where some elements of the proposed changes would be out of scale or uncharacteristic of an area.
Minor adverse	Where the proposed changes would be at slight variance with the character of an area.
Negligible adverse	Where the proposed changes would be barely discernible within the landscape.
Neutral:	Where the proposals would be in keeping with the character of the area and/or would maintain the existing quality or where on balance the proposals would maintain quality (e.g. where on balance the adverse effects of the proposals are off-set by beneficial effects).
Negligible beneficial	Where the proposed changes would be barely discernible within the landscape.
Minor beneficial	Where the proposed changes would reflect the existing character and would slightly improve the character and quality of the landscape.
Moderate beneficial	Where the proposed changes would not only fit in well with the existing character of the surrounding landscape but would improve the quality of the resource through the removal of detracting features.
Major beneficial	Where the proposed changes would substantially improve character and quality through the removal of large-scale damage and dereliction and provision of far reaching enhancements.

3.17 The effect of relevant aspects of the project on views has been described and evaluated as set out in Table 3.6 below.

Table 3.6: Significance of visual effects

Significance of effect	Definition (visual resource/receptors)
Major adverse	Where the proposed changes would form a major part of the view, or would be uncharacteristic, and would alter valued views.
Moderate adverse	Where the proposed changes to views would be out of scale or uncharacteristic with the existing view.
Minor adverse	Where the proposed changes to views would be at slight variance with the existing view.

Significance of effect	Definition (visual resource/receptors)
Negligible adverse	Where the proposed changes would be barely discernible within the existing view.
Neutral	Where the project would be imperceptible or would be in keeping with and would maintain the existing views or, where on balance, the proposals would maintain the quality of the views (which may include adverse effects of the proposals which are offset by beneficial effects for the same receptor).
Negligible beneficial	Where the proposed changes would be barely discernible within the existing view.
Minor beneficial	Where the proposed changes to the existing view would be in keeping with and would improve the quality of the existing view.
Moderate beneficial	Where the proposed changes to the existing view would not only be in keeping with but would greatly improve the quality of the scene through the removal of visually detracting features.
Major beneficial	Where the proposed changes to existing views would substantially improve the character and quality through the removal of large-scale damage and dereliction and provision of far reaching enhancements.

3.18 The level of effects is described as Major, Moderate, Minor or Negligible. Where Negligible adverse and beneficial effects occur within the same view or same landscape, the effect can be described as neutral on balance. The level of effects varies according to individual circumstances and the baseline situation, for example the presence of landscape designations and/or visual detractors.

3.19 A conclusion regarding the significance of each effect on a landscape or visual receptor needs to combine separate judgements about the sensitivity of receptors and magnitude of change as a result of the proposed development. GLVIA3 states at paragraph 5.55 that a sequential approach can be taken to appraisal of significance; "*susceptibility to change and value can be combined into an appraisal of sensitivity for each receptor, and size/scale, geographical extent and duration and reversibility can be combined into an appraisal of magnitude for each effect. Magnitude and sensitivity can then be combined to assess overall significance*".

3.20 In the appraisal those levels of effect indicated as being of Major may be regarded as significant effects. An accumulation of individual Moderate effects, for instance views experienced along a designated route, may also be regarded as significant.

Limitations and assumptions

3.21 The visual appraisal is based on analysis of OS mapping of the Candidate Site and surrounding area and field survey of views towards the Candidate Site from publicly accessible viewpoints in the surrounding landscape. Although every effort has been made to include viewpoints in sensitive locations and areas from which the proposed development is likely to be most visible, not all public viewpoints, from which the proposed development may be seen, are included in the appraisal.

3.22 A field survey to inform the appraisal of both landscape and visual effects was undertaken in February 2020 (late winter) when existing deciduous vegetation was without leaf.

4 BASELINE CONDITIONS

Landscape Baseline

4.1 This section sets out the context of the Candidate Site within the surrounding area, with reference to published landscape assessments and, where relevant, landscape designations at national and local levels. It describes the location, topography and drainage, land use, vegetation cover, existing rights of way and existing landscape character. The Candidate Site, its location and landscape planning context, are shown at Figure 1 and in the photographs at Figures 4.1 – 4.8 and Appendix B.

Study Area

4.2 In order to help determine the extent of the study area for a landscape and visual assessment, a computer-generated Zone of Theoretical Visibility (ZTV) is frequently used. Preparation of a ZTV is recommended in GLVIA3 (para. 6.8, p.103) as, *"it makes clear that the area so defined only shows land from which the proposal may theoretically be visible."* A ZTV can be completed using a 'bare earth' scenario, i.e. no intervening structures or significant vegetation, and a 'with barriers' scenario using existing screening features, i.e. urban areas and existing vegetation.

4.3 A ZTV for the proposed development, which considers the screening effects of significant blocks of existing vegetation and settlement, is included within this appraisal (Figure 3). It illustrates the theoretical extent of the surrounding area from where the proposed development may be visible. The ZTV was computer generated using Key Terra-Firma software using 8 origin points, from proposed residential dwellings in key locations within the central, southern and northern parts of the Candidate Site, at a maximum ridge height of 9m above existing ground level (EGL). A 3km radius has been selected (equivalent to a 6km diameter) for the study area used in this appraisal, consistent with other appraisals carried out for similar schemes. It is considered that any potential significant visual and / or landscape effects would occur well within 3km of the Candidate Site for the type of development proposed. Topographical variation and drainage within the study area is shown on Figure 2.

Landscape Baseline

Landscape Character

4.4 Landscape character areas and landscape character types can be defined at a variety of scales and a substantial amount of published information is available at the national, county and district scales. The principal published information comprises Natural Resources Wales (NRW) national landscape characterisation of Wales (NRW, 2014) and LANDMAP, an "*all-Wales Geographical Information System (GIS) based landscape resource…"*.

National Landscape Character

4.5 At a national level, Natural Resources Wales (NRW) has prepared a National Landscape Character Areas (NLCA) map for Wales (NRW, 2014) (Ref 7). This has divided the country into 48 broad scale character areas, the descriptions of which highlight what distinguishes one landscape from another with reference to distinct natural, cultural and perceptual characteristics within each region. The Candidate Site falls entirely within NLCA '31: Central Monmouthshire' (Canolbarth Mynwy). (Ref. Figure 5)

4.6 NLCA 31 is described as a *'gently undulating lowland landscape of hills, valleys and floodplains. It is in great contrast to adjacent upland landscapes that rise to the west. Fault-aligned vales and*

glacial deposits give rise to the fertile alluvial deposits that are key to the prosperity of this rural, farmed area. The River Usk drains much of the south and west. The Monnow and Trothy drain the north.

Country lanes with high hedges link villages and hamlets that have a distinctive vernacular style in Old Red Sandstone and whitewashed cottages with slate roofs. In open country, whitewashed farmhouses stand out against the green backdrop of pastured fields and woodlands.' (NCLA31: Summary Description, NRW 2014).

4.7 The key characteristics of NCLA31 are summarised below.

- *An area of gently rolling hills, intervening valleys and the Usk flood plain.*
- *The Usk, the main watercourse, flows south from Abergavenny and eventually becomes tidal. Rivers Trothy and Monnow in the north feed into the Wye in the adjacent character area to the east. Their alignments are influenced by geological faults.*
- *Hedge-bound fields are mainly given to sheep grazing and dairying, with areas of arable farming on the fertile floodplain.*
- *Woodlands and mixed plantations cover many slopes and hill tops in parts of the area.*
- *Mixed habitats, notably mixed broadleaved woodlands containing a variety of rare tree species and are important habitats, as is the open water of the Llandegfedd Reservoir - a key site for overwintering birds.*
- *Small nucleated hamlets and villages are scattered throughout the area, linked by a network of winding rural lanes. Medieval stone churches are characteristic of the villages.*
- *The sheltered landscape has a peaceful rural character, with any significant modern intrusion confined to the road corridors of the A40 and A 449.*

Regional Landscape Character

4.8 LANDMAP is an "all-Wales Geographical Information System (GIS) based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent dataset" (CCW (now NRW), 2011). It is administered by Natural Resources Wales (NRW) and comprises five spatially related datasets or aspect layers as follows:

- Geological Landscape*: "considers the physical, primarily geological, influences that have shaped the contemporary landscape and identifies those landscape qualities which are linked to the control or influence exerted by bedrock, surface processes, landforms and hydrology";*
- Landscape Habitats*: "Focuses on recording habitat features, characteristics and their spatial relationships within the context of the wider landscape";*
- Visual and Sensory Landscape*: "Maps landscape characteristics and qualities as perceived through our senses, primarily visually. The physical attributes of landform and land cover, their visible patterns and their interrelationship";*
- Historic Landscape*: "Landscape characteristics that depend on key historic land uses, patterns and features. Identifies only those classes of historic land uses, patterns and features that are prominent and contribute to the overall historic character of the present landscape."; and*
- Cultural Landscape*: "Describes the links between landscape and people, from the way in which cultural, or human activity shapes the landscape, to the way in which culture shapes the way we respond to landscape. Focus is on mapping the landscape where it has been, or is being, shaped by a particular cultural activity or process, or where it has been directly represented, depicted or described in art, literature or folklore."*

4.9 For each dataset the landscape is divided into discrete geographical units referred to as aspect areas. Each is given a unique identification code and is accompanied by a dataset which includes both a description and evaluation of quality and value.

4.10 Whilst all LANDMAP Aspect Areas have been considered, for the purposes of this Landscape and Visual Appraisal the main focus will be on those Aspect Areas which would be directly affected by the proposed development. i.e. those that fall within the Candidate Site itself.

Visual and Sensory Landscape Aspect Area

4.11 The Candidate Site is located entirely within 'Goytre Lowland' (MNMTHVS042) Visual and Sensory aspect area (Ref. Figure 7). The overall evaluation for this aspect area is High (Ref. Figure 8) described as an *'A gently undulating lowland landscape, sheltered by the scarp slopes of Mynydd Garn-fawr and Garnclochdy to the west, gradually merging with the floodplain of the River Usk to the east... It is an enclosed landscape with large irregular blocks of mixed deciduous and coniferous woodland, parkland and medium to large-scale fields of permanent pasture and arable crops, becoming smaller and more irregular to the south... These fields are enclosed by a strong structural network of traditional field boundaries, individual field trees and hedgerow trees and often interspersed with streams, tributaries and ponds... It is a domesticated landscape with numerous large farmsteads, traditional cottages, country estates and small-scale linear settlements... It is crossed by a network of narrow roads as well as the main A4042(T) and the Newport to Hereford railway...'.*

Geological Landscape Aspect Area

4.12 With regard to the Geological Landscape aspect area, the Candidate Site is located entirely within 'Llanover' (MNMTHGL045) (Ref. Figure 9). Described as *'Broad, undulating, stream-dissected terrain S and W of the Usk valley in the Llanover-Penperlleni area. Dominated by glacial clays over Lower Old Red Sandstone Group mudrocks (Upper Silurian-Lower Devonian). Includes a small section of the Usk Silurian inlier E of Penperlleni and the lower gentle slopes of the major Lower Old Red Sandstone sandstone escarpment to the W'*. The overall evaluation of the aspect area is High.

Landscape Habitat Aspect Area

4.13 The Candidate Site is located partly within two Landscape Habitat aspect areas. The easternmost parts of the site, nearest the settlement of Penperlleni, is located within the landscape habitat aspect area 'Area surrounding Little Mill' (MNMTHLH124). While the majority of the site, to the west, is located within 'Farmland to W. of Llanover' (MNMTHLH067) (Ref. Figure 10). The overall evaluation of aspect area is MNMTHLH124 is Moderate due to the area being *'Improved grassland is generally quite a low ecological value habitat but the overall evaluation of the area is increased by the pockets of broad-leaved woodland and also by the considerable number of key species recorded as being present'*. The overall evaluation of aspect area MNMTHLH067 is similarly Moderate, although *'This Aspect Area could easily be evaluated as low as improved grassland (particularly under more modern farming practices) is generally quite low ecological value habitat. The value has been increased to moderate however due to the presence of hedgerows and a principally because of the pockets of broad-leaved woodland present, the Monmouthshire-Brecon Canal and a number of key species'*.

Historic Landscape Aspect Area

4.14 The Candidate Site is located entirely within 'Goetre' Historic Landscape aspect areas (MNMTHHL055) (Ref. Figure 11). The overall evaluation of this aspect area is High and is described as *'…an area of rolling landscape located west of the Usk Valley, in the main part of the*

lands held by the Llanover Estate. The pattern is predominantly of small to medium sized irregular enclosures, though areas of regular fieldscape also occur, settlement is largely dispersed farmsteads with small foci, such as Mamhilad focussed on its church. The larger settlements are Penperlleni, a road junction cluster, and the linear settlement of Little Mill; both settlements have seen expansion since the mid-19th century and in more recent years. Only meagre evidence of prehistoric or Roman activity has been identified within the vicinity of this Aspect Area. A palstave of early Bronze Age date was found at Penperlleni (NGR SO 325 046) and a scatter of flints was identified at Upper Pentwyn Farm to the N of Llanfair Kilgeddin on the E periphery of the Aspect Area. No Roman military or settlement sites have been identified within the Aspect Area. The route of a possible Roman road from Mamhilad across to Trevethin has been suggested by Bradney, although no definite physical evidence has been found to support this identification. Medieval settlement appears to have been centred upon the nucleated villages of Goetre and Mamhilad. Mamhilad may have been a pre-Conquest monastic centre, suggested by an account in the 12th century Life of St Cadoc concerning the removal of the shrine of St Cadoc by the monks of Llancarfan 'as far as the place called Mamhilad' (Knight, 2004, 276). The origins of the existing landscape pattern largely date from the post-medieval period, it is characterised by the existence of Llanover Estate, an extensive landholding, the exact bounds of which are unknown, but which originally covered a considerable part of the Aspect Area, and which was built up between the 16th and the 19th centuries. The importance of the Aspect Area as a transport corridor during the 18th-19th century is well attested by the well-preserved remains of the Brecon and Abergavenny Canal (the section extending through the Aspect Area was completed between 1810 and 1812) and the existing Newport to Hereford railway (constructed in the mid 1850s). The construction of the railway in particular acted as a stimulus to settlement growth at Penperlleni (NGR SO 325 050) and Little Mill (NGR SO 322 030), both of which developed into minor railway settlements during the second half of the 19th century (Locock, 2002, 44-7)'.

Cultural Landscape Aspect Area

4.15 The Candidate Site is located entirely within the Cultural Landscape Aspect Area 'Lower Usk River Valley' (MNMTHCL047) (Ref. Figure 12). The overall evaluation for this Aspect Area is High and is described as being *'…predominantly rural, with agriculture as the primary industry: lowland flood-plain pasture nearest to the meandering course of the river with mixed farming on the rising ground. The area defined is also remarkable for the high number (10) of designed landscape parks recorded on the Register of Landscapes Parks and Gardens, together with the uncounted number of estates and estate houses present in the landscape, some of which are listed, most of which contribute to the perception of the wealth of their occupants and owners over time. Land use has built upon the strategic importance of the river, with Roman fortifications at Caerleon (adjacent to the Study Area), Usk and Abergavenny, reinforced by Norman castles. The river was valuable as a communications route from the sea at Newport since the Roman period, being tidal up to Newbridge-on-Usk. In the 20th century, the development of the Usk Valley Walk has added a new cultural dimension, complementing its centuries-long use as a game-fishing destination. The gentle countryside is scattered with many small attractive villages linked, because of the devious ways of the river, by a good number of mediaeval bridges. The biggest threat to this tranquillity is the possibility of dredging the river for aggregates'*.

Local Landscape Character

4.16 The Candidate Site is located within the Monmouthshire County Council named Local Landscape Character Area (LLCA) PE02: Penperlleni. As derived from the Monmouthshire Landscape Sensitivity Update Study (October 2020). (Ref. Figure 6). This LLCA would be directly affected by any proposed development. To the north, beyond Park Y Brain Lane, and to the east beyond Penperlleni, are the adjoining LLCA PE01, 03, 04 and 05. Parts of these adjoining LLCAs may experience an indirect perceptual effect, albeit that the existing development of Penperlleni is

between them and the Candidate Site. Key characteristics of LLCA PE02 that are relevant to the Candidate Site are:

- *Gently undulating slopes with small stream valleys.*
- *Irregular small to medium-sized fields with a mix of outgrown and lowcut hedgerows.*
- *Damp woodland in stream valleys, mature trees in hedgerows and fields and around settlement.*
- *The undulating landform creates local skylines in places with the main skyline being the ridge to the west.*
- *Tranquillity increases towards the west away from the A4042[T].*
- *The area forms part of the landscape rising west from the settlement towards the ridge.*
- *Brecon Beacons National Park lies west of the Monmouthshire and Brecon canal which overlooks the area.*

4.17 The landscape and visual sensitivity to housing, of LLCA PE02, has been identified as High / Medium. Stating that *"The susceptibility of the area lies in its character as open countryside rising west from the settlement towards the canal corridor and ridge, the watercourses and associated riparian corridors, woodland, hedgerows enclosing small to medium scale fields with the irregular boundaries and trees. The settlement is well contained by the A4042[T] and trees, especially to the north. The value of the area lies in the National Park, its role contributing to the setting of this and the Monmouthshire and Brecon canal, the listed building and bridge and the PROWs including regional cycle route. The least sensitive part, although it would markedly extend the settlement to the south of new development, would be the sloping pasture east of the A4042, bounded by a small watercourse to the south. Any extension south of this waterbody or west of the A4042 or north of the settlement would be highly detrimental. LANDMAP value is high for visual and sensory, historic landscape, cultural landscape and geological landscape"*.

4.18 When looking at the remaining Local Landscape Character Areas surrounding Penperlleni (PE01, 03, 04 and 05), as derived from the Monmouthshire Landscape Sensitivity Update Study (October 2020). the LLCAs as a whole have all been identified as High / Medium landscape and visual sensitivity to housing, PE02 is therefore comparable to and no more or less sensitive to the type of development proposed. However, it is considered that there are local variations within each of the LLCAs, depending on the location and proximity to the development edge of Penperlleni, including the busy A4042[T], and its influence upon the LLCA. This is particularly apparent with parts of the Candidate Sites easternmost parts, which are immediately adjacent to the busy A4042[T] and existing development edge of Penperlleni. An influence which is not so apparent within the western parts of the Candidate Site.

Site Description

Location, Land Use and Development Context

4.19 The Candidate Site is located on land to the west of Usk Road. Abutting the western edge of the village of Penperlleni (Monmouthshire). It is currently arable / pastural fields for the purposes of grazing and / or silage. The highest point within the Candidate Site is approximately 104m AOD in the south westernmost part of the site. With land gently falling in an easterly direction to a height of approximately 97m AOD at the easternmost corner of the site. The landscape in the wider study area is gently rolling hills, incised by a number of distinct valleys. A result of a number of small watercourses and larger rivers throughout the local area, including the River Usk to the east. Land to the west of the study area rises steeply, forming part of the Brecon Beacons National Park, to a height of 400m + AOD in places.

4.20 The landscape throughout the study area, beyond Usk Road and outwith the settlement of Penperlleni, is characterised by irregular-shaped, small to medium-sized fields predominantly put to pasture. The fields are divided by largely intact native species boundary hedgerows, including hawthorn and holly. The hedgerows link to small irregular-shaped copses and larger woodland blocks, such as Ynys-y-pica Wood, which are common throughout the study area. Woodland copses are frequently located adjacent to the various watercourses throughout the study area and many of them are designated Ancient and Semi Natural Woodland (Figure 1).

Topography and Drainage

4.21 The Candidate Site is gently undulated, with a distinct hollow and low point towards the south east corner of the site, at some 97m AOD, although the lowest point is at 96m AOD at the north east corner of the Candidate Site. With land sloping gently east to a locally pronounced ridgeline at some 100m AOD within the centre of the site. The land continues to rise gently, generally west, to approximately 104m AOD at the westernmost corner of the site (Figure 2).

4.22 The topography of the study area is similarly gently undulating as a series of ridges and valleys that range from approximately 30m AOD in parts to the east, rising steeply up to 445m AOD to the west within the Brecon Beacons National Park.

4.23 There are no major water courses running through the Candidate Site. There are a number of nearby springs, in the local area, that feed tributaries of the River Usk to the east. The Monmouthshire and Brecon Canal, located to the west, follows the boundary of the National Park.

Vegetation of the Candidate Site

4.24 Native hedgerows with hedgerow trees contain parts of the site and connect to other field boundaries, tree belts and blocks of woodland to the west. Vegetation within the remainder of the Candidate Site, in bound of the established field boundaries, is limited being entirely pastural fields and are currently grazed.

Vegetation of the surrounding area

4.25 Existing mature hedgerows occur to the majority of the boundaries around the Candidate Site that provide a good vegetation cover, with intermittent gaps, generally at field entrances. The south west of the Candidate Site is more open to the surrounding landscape. With scattered trees reminiscent of an historic parkland landscape (Llanover Estate). Beyond the Candidate Site, to the west, the landscape is one of scattered woodland blocks and linear tree belts interspersed with characteristic small to medium sized irregular fields. The boundaries to all the fields are generally intact hedgerows and trees which are also evident along the road network. To the immediate east of the Candidate Site the settlement of Penperlleni / Goytre spreads along the railway, between that and the A4042 Usk Road. Beyond the railway, although some scattered development has broken the pattern, a pattern of small irregular fields and scatter woodland blocks persist surrounding the settlement of Penperlleni on all sides. Larger woodland blocks are evident throughout the area, to the north and east adjacent to the River Usk.

4.26 In the close vicinity of the Candidate Site the area to the north, west and south in part, is characterised by small scale arable fields generally contained by largely intact hedgerow and large scattered trees, punctuated by small linear blocks of woodland further to the west. Resulting in a parkland like landscape, historically associated with a number of larger properties to the west.

Access and infrastructure

4.27 There is no public access across the Candidate Site. There are numerous Public Rights of Way (PRoW) in close proximity to it and within the wider study area. The nearest being a public

footpath (358/67/1) to the north west of the Candidate Site, accessed off Park Y Brain Lane, which traverses generally north east across a pastural field before crossing the A4042 and joining the wider PRoW network through the north of Penperlleni.

4.28 A network of Public Rights of Way (PRoW) extends across the study area and provides connections to villages and farms, often following field boundaries.

4.29 The closest major road corridor is the A4042 Usk Road that takes a route generally north to south through the centre of the study area links Penperlleni with larger settlements to the north and south, including Abergavenny to the north and Pontypool / New Inn to the south. There is also a trainline, which follows the eastern settlement edge of Penperlleni and travels in a similarly north to south direction linking the different towns in the area. There are a number of other A and B roads and unclassified lanes which link the various towns and villages within the wider study area.

4.30 The closest residential properties are off School Lane / Folley View Close to the east of the Candidate Site over the A4042 Usk Road. There are also a limited number of residential properties to the west of Usk Road, adjacent to the Candidate Site, including numbers 1 and 2 and Goytrey House Farm off Park Y Brain Lane and Lyndhurst to the south west.

Landscape Value

4.31 As part of the baseline description of the study area the value of the landscape that would be affected has been established.

4.32 GLVIA3 defines value as" *the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons… A review of existing landscape designations is usually the starting point to understanding landscape value, but the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape – such as trees, buildings or hedgerows may also have value*."

Designated Landscapes

4.33 Relevant landscape planning designations are shown on Figure 1. The Candidate Site is not located within any designated landscape of national importance (such as Areas of Outstanding Natural Beauty or National Parks). The nearest such designation is the Brecon Beacons National Park, some 200m to the south west of the Candidate Site (at its nearest point). As such, there would be no direct impact upon the Brecon Beacons National Park as a result of any proposed development. The ZTV (Figure 2) has suggested that there would be limited intervisibility with parts of the National Park. As such, there would therefore be the potential for some perceptual effects upon the character and appreciation of these parts of the park as a result of people being able to experience limited views to any proposed development. However, due to the undulating nature of the topography and intervening settlement and, in particular, woodland, views to the Candidate Site from the wider landscape would be limited and so, these potential perceptual effects are unlikely to be significant.

4.34 A proposed development within the Candidate Site, would have no direct effects upon any other designated site within the study area (Figure 1). There would, however, be varying perceptual effects, particularly upon those designations in close proximity or with unobstructed views to a proposed development on the Candidate Site.

Non-designated Landscapes

4.35 As discussed in paragraph 3.29, the Candidate Site does not lie within a nationally or locally designated landscape. This does not mean that the Candidate Site has no value. As described in paragraph 3.3, the European Landscape Convention (ELC) requires that account should be taken

of all landscapes, designated or not. In GLVIA3, Box 5.1, sets out a range of factors that might be considered to help in the identification of valued landscapes. In addition, factors in Box 5.1 are complemented by factors listed in Landscape Institute, Technical Guidance Note 02.21 that includes the functional aspects of a landscape in assessing value and are used in this appraisal to establish value.

Landscape Quality

4.36 Landscape quality, or condition, measures the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.

4.37 The hedgerows and trees associated with the Candidate Site and its boundaries are a strong feature and partially enclose the existing site adding to its characteristic field structure and have a medium value. The internal open improved grass areas, the fields themselves, have no more than medium to low value, albeit that they contribute to the overall rural setting of Penperlleni. The largely intact hedgerows, woodland blocks are an attractive feature of the study area and cohesive characteristic of this rural area, interspersed by development. The landscape value to the immediate east of the Candidate Site, i.e. the settlement of Penperlleni, could be considered of lesser quality. Although the area is heavily influenced by the rural setting. The busy A4042 Usk Road is a detractor and partially dilutes the overall rural character within the immediate landscape through which it passes.

Scenic Quality

4.38 This measures the degree to which the landscape appeals primarily to the visual senses. The visual baseline is analysed in more detail below.

4.39 The Candidate Site is outside of settlement boundaries, albeit that parts of it have been heavily managed / grazed for agricultural purposes. Penperlleni can be considered as a rural settlement, although it is the largest settlement in the local area and is identified in the adopted LDP as a location for growth.

4.40 The sense of countryside within the Candidate Site's easternmost parts is slightly diluted by the presence of existing residential development, adjoining the Candidate Site and immediately to the east of the A4042, as well as traffic using local roads. In particular, the busy A4042 which makes up the easternmost boundary.

4.41 The sense of the Candidate Site forming part of a continuous area of countryside is fragmented by the presence of the local roads, existing residential development and the managed nature of hedgerows and arable / pastural fields, particularly in the northern parts of the Candidate Site. With the perception of tranquillity being greater towards the more westerly and south westerly parts of the Candidate Site.

4.42 By contrast, the westernmost parts of the Candidate Site contribute and have more in common with the scenic quality of the wider countryside. With characteristic large trees creating more of a parkland landscape within the transition to the rural landscape to the west.

Rarity and Representativeness

4.43 Rarity is concerned with the presence of rare features and elements in the landscape or the presence of a rare character type and representativeness analyses the features or elements within the site and its surroundings which are considered particularly important examples, which are worthy of retention.

4.44 The improved grassland, hedgerows with trees and individual trees of the Candidate Site are typical of the local area and cannot be defined as rare features. Though commonplace, the

vegetation surrounding the site is a good example within the local landscape and contributes to the settling of Penperlleni.

Conservation Interests

4.45 This considers the presence of features of wildlife, earth science, historical and cultural interest that can add value to a landscape.

4.46 There are no ecological or heritage designations on the Candidate Site in recognition of its value. As with most sites there is some ecological interest, and this would be considered in a separate study. The areas of grassland or deciduous woodland blocks outside the Candidate Site within the study area form better quality habitats and have a higher value.

Recreational Value

4.47 This considers any evidence that the landscape is valued for recreational activity where experience of the landscape is important.

4.48 There is no public access to the Candidate Site and therefore it has no direct recreational value. A public footpath north west of the site, is separated by boundary and intervening vegetation that limits views into the site. There are numerous PRoW throughout the wider study area, some in elevated locations particularly to the west. Extensive intervening vegetation and landform limit potential views to the Candidate Site from the wider PRoW network, with intermittent more open views available from higher ground to the west.

Perceptual Aspects

4.49 A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity

4.50 The landscape of the site is highly managed. The managed land, hedgerows and trees do not have wild qualities and the east and north boundaries of the Candidate Site are defined by roads. The hedgerows with trees provide good visual containment and a sense of enclosure. Road noise from the busy A4042 limit the sense of tranquillity in the eastern parts of the site, though this diminishes to the west and the westernmost parts of the Candidate Site could be considered more tranquil. With the value being medium overall.

Associations

4.51 This considers any evidence of artistic endeavours and historic events that contribute to the perceptions of the natural beauty of an area.

4.52 The site and its surroundings do not have any special cultural, literary or artistic associations that increase its value.

Summary of Landscape Value

4.53 The value of the landscape of the Candidate Site and the surroundings is considered to range for low to medium. The elements of grassland, hedges, trees and shrubs and hedgerow with tree boundaries which comprise the site are not rare within the local area, although these features should be retained, where practicable, as part of any development. The site has no public access or recreational value, although forms part of the general character of the area within which recreational routes exist. The site, although not wild or tranquil in itself, is part of a landscape which potentially has a greater degree of tranquillity when away from settlements and roads. Therefore, whilst the Candidate Site and surroundings have some positive landscape elements and some wildlife interest which contribute to the rural setting of Penperlleni, including the western parts of the site contributing to the landscape function in terms of a landscape buffer between the

settlement edge and lower slopes of the Brecon Beacons National Park, these are not considered sufficient to elevate this landscape to one that is highly valued. Overall, the landscape of the Candidate Site has limited special qualities and the contribution the site makes to the wider landscape is of Medium value, when considering the high value in the westernmost parts of the Candidate Site and low value to the east adjacent to the A4042 and settlement edge of Penperlleni.

4.54 The overall LANDMAP evaluation for Visual and Sensory Aspect Area (MNMTHVS042), within which the Candidate Site is located, is adjudged to be High. This is justified by the evaluation of two 'highs' and two 'mediums' when considering all criteria.

Visual Baseline

Visual Receptor Groups

4.55 Visual receptors include the public and community at large, residents and visitors to the area. Representative viewpoints looking towards the proposed development have been selected and are described in Table 4.1 below and other potential visual receptor groups are summarised below.

Views from Residential Properties

4.56 People within residential properties are considered to have high sensitivity to changes in visual amenity. The windows of ground floor and living rooms are considered particularly sensitive to views. As people spend less time in the upper floor bedrooms these are considered less sensitive than ground floor views.

4.57 Occupants of residential properties in Penperlleni with views to the Candidate Site are limited. Visual receptors include rear and front elevation oblique views for residents of some properties at the end of Folly View Close and primarily upper storey rear elevation views for residents of properties along School Lane. Residents of properties along the A4042 (Lyndhurst and Maes-Y-Beryn to the north) and Park Y Brain Lane (Numbers 1 and 2 and Goytrey House Farm) would have near distance views. These would be primarily from rear / side elevation upper storeys, although established mature hedgerows and woodland planting largely screen possible views. For other residents, i.e. to the east within the wider urban area of Penperlleni, they would have limited or no views available.

Views from Public Rights of Way

4.58 People travelling along Public Rights of Way (PRoW) through the countryside are considered to be receptors of high sensitivity due to the recreational nature of using PRoW. The susceptibility of visual receptors may be influenced by the visual amenity they experience at a particular location. Therefore, people using more scenic PRoW are likely to be of higher sensitivity than pedestrians using rights of way in an urban context or pavements in a street.

4.59 A short Public Right of Way (PRoW) 358/67/1 (Representative Viewpoint 3), the nearest to the Candidate Site, passes through a pastural field to the north west, linking Park Y Brain Lane and the A14042 to the north. Potential views from this PRoW would be limited by intervening landform and, in particular, existing vegetation. There are several other PRoW within the wider landscape including the Usk Valley Walk. However, due to distance from the Candidate Site, as well as the intervening, undulating topography and the vegetation, it is anticipated that the potential effects upon views for users of these more distant PRoW would be limited.

Views from Community Facilities

4.60 People using community facilities or involved in outdoor activities where attention is not focused on the landscape are less sensitive to change and are generally considered to have a medium sensitivity to change.

4.61 The nearest community facility within the study area is a recreation ground / play area to the east off School Lane. Potential views to the site from this location would be very limited due to intervening development and vegetation and with land generally falling away towards the railway.

Views from Industrial and Commercial Premises

4.62 People within commercial premises or at a place of work are considered to have a low sensitivity to change in visual amenity as they are focused on the business that they are conducting.

4.63 There are some farming / light industry / commercial properties within the immediate vicinity of the site, including Goytrey House Farm, the Goytre Arms and Goytre Car Company. Occupiers of these premises have largely filtered / screened views to the Candidate Site over and through the boundary hedgerow. Although views from the Goytre Arms would be further limited as there are no windows to the elevation facing the Candidate Site. Views would be limited to users outside this premises within the front courtyard. Other commercial / industrial premises within the study area include farmsteads, light industry, and larger industrial estates. There would be very limited views available to the Candidate Site due to intervening topography, development, and vegetation. Agricultural workers in the surrounding fields are likely to experience similarly limited views of the of the Candidate Site due to the screening effect of intervening vegetation.

Views from Surrounding Roads Network

4.64 People travelling in vehicles on roads are considered to have low sensitivity to change as their attention should be focussed on the road rather than the visual amenity of their surroundings.

4.65 The A4042 Usk Road and Park Y Brain Lane lie to the east and north of the Candidate Site, forming the eastern and northernmost site boundaries respectively. Substantial and well-maintained hedgerows, on embankment along parts of the A4042, are present along the length of these roads. Indeed, hedge lined roads are a characteristic feature of the landscape throughout the study area. From elevated sections of these roads, on approach to Penperlleni, or where intervening roadside hedgerows are at their lowest (Representative Viewpoint 1) and / or where there are field gates (Representative Viewpoint 2), there would be views of residential development on the Candidate Site. Numerous minor roads link the farmsteads, hamlets and villages surrounding the Candidate Site. These roads are predominantly surrounded by tall hedgerows and hedge banks. Only through field gates and where the roads are elevated and orientated directly to the Candidate Site are views potentially available. As people using these roads only have the potential to catch glimpses of the Candidate Site, it is considered that potentially significant visual effects upon views for road users as a result of any proposed development would be unlikely.

Representative Viewpoints

4.66 Representative viewpoints (the existing baseline view) looking towards the Candidate Site are listed and described in Table 4.1 below. The locations of these are shown on Figure 2, and the existing daytime view (winter only) from each is shown on Figures 4.1 – 4.7 and assessed in section 6 below. In order to further inform the appraisal contextual panoramas, from each of the Representative Viewpoints, have been provided. These are shown at Appendix B and show the winter (worst case) scenario for context, to better understand how the site fits into its' setting.

4.67 To help determine the extent of the study area for a landscape and visual assessment, a computer-generated Zone of Theoretical Visibility (ZTV) is frequently used. Preparation of a ZTV is recommended in GLVIA3 (para. 6.8, p.103) as, *"it makes clear that the area so defined only shows land from which the proposal may theoretically be visible."* A ZTV can be completed using a 'bare earth' scenario, i.e. no intervening structures or significant vegetation, and a 'with barriers' scenario using existing screening features, i.e. urban areas and existing vegetation.

4.68 A ZTV for the proposed development, which takes account of the screening effects of significant blocks of existing vegetation and settlement, is included within this appraisal (Figure 2). It illustrates the theoretical extent of the surrounding area from which the proposed development may be visible. The ZTV was computer generated using Key Terra-Firma software using eight origin points, from proposed residential plots in key locations within the central, southern and northern parts of the Candidate Site, at a maximum ridge height of 9.5m Above Ordnance Datum (AOD). A 3km radius has been selected (equivalent to a 6km diameter) for the study area used in this appraisal, consistent with other appraisals carried out for similar schemes. It is considered that any potential significant visual and / or landscape effects would be well within 3km of the Candidate Site. Topographical variation and drainage within the study area is shown on Figure 3.

4.69 Visual receptors include the public and / or local community, commercial properties and visitors to the area. Private residential views have been included in the assessment. However, in the planning system no individual has the right to a view. These include views from local roads and other publicly accessible areas, including the public rights of way network, at different distances and orientations to the Candidate Site. The Representative Viewpoints have been used to assess the potential visual effects of the proposed development at their specific locations (see Figure 2).

Table 4.1 Representative Viewpoints

Viewpoint No. and Location	Sensitivity	Approx. NGR and Distance to Candidate Site (m)	Description of Existing (Baseline) View
Viewpoint 1: A4042 Usk Road	**Low** (Local main road users)	332157, 204483 (<10m)	View from roadside footway, adjacent to the busy A4042 Usk Road, to the south east of the Candidate Site. Views to parts of the Candidate Site are partially screened by field boundary hedgerow to the roadside and within the site. Internal hedgerows are somewhat gappy, accentuating intervisibility due to the lack of leaf cover. With land rising gently to the north, the northernmost site boundary is clearly visible above the foreground, although undulating topography within the site, with a pronounced high point to the right of the view, partially screens views to and the extent of existing vegetation within the site. To the north of Park Y Brain Lane, in the mid ground of the view, there are glimpsed partially screened views to existing development, including Goytrey Farm and House. With more distant glimpsed views to Maes-Y-Beryn, to the right of the view. Through mature parkland trees along Park Y Brain Lane there are glimpsed distant views to higher ground to the north west, towards Pentre Hill and the Brecon Beacons National Park.

Viewpoint No. and Location	Sensitivity	Approx. NGR and Distance to Candidate Site (m)	Description of Existing (Baseline) View
Viewpoint 2: Park Y Brain Lane	**Medium** (Local road users)	332140, 204725 (<10m)	Framed view through field access gate, into Candidate Site, to the edge of Park Y Brain Lane. Undulating landscape within Candidate Site is clearly noticeable, falling away to the south east of the site, rising again towards 'Lyndhurst' which is clearly visible above hedge planting to the south east boundary above the field access gate. There are glimpsed views through tree planting adjacent to Usk Road to residential properties along School Lane, with glimpsed views to rising ground to the south. Other vertical elements within the view includes lighting columns and electricity pylons along Usk Road.
Viewpoint 3: Public Right of Way (footpath) 358/67/1	**High** (Users of PRoW)	332023, 205001 (248m)	Generally open view across pastural field towards Candidate Site. Scattered parkland trees of varying maturity within the field, along with gently rising ground, roadside vegetation along Park Y Brain Lane and surrounding Goytre House screen / filter potential views to the Candidate Site. With land falling away gently from Park Y Brain Lane there is no possible view to the ground level of the Candidate Site. There are glimpsed views to existing development, including Goytre House and properties at the junction of Park Y Brain Lane and Usk Road. To the horizon of the view, the are glimpsed views to the treed rising ground to the south east.
Viewpoint 4: A4042 Usk Road	**Low** (Local main road users)	332229, 204772 (106m)	View from roadside footway adjacent to busy A4042. Large grass verge leads to mature roadside / field boundary hedgerow on land slightly above road. A small part of the Candidate Site is visible above the roadside vegetation, seen between existing residential properties at the junction of Park Y Brain Lane / Usk Road and outbuildings across much of the view. Extensive tree cover, including coniferous trees, further restrict potential views of the Candidate Site. Other vertical elements within the view include lighting along Usk Road and electricity pylons. Above the small part of the Candidate Site, which is visible, are glimpsed views to the existing development to the south of Usk Road off School Lane.
Viewpoint 5: Star Road at junction with Public Right of Way (footpath) 358/93/2	**High** (Users of PRoW) **Medium**	332956, 204740 (750m)	View from roadside, at junction with PRoW 358/93/2. Generally open view across road and over arable fields towards Penperlleni and Candidate Site. Undulating topography and, in particular, layered vegetation and

Viewpoint No. and Location	Sensitivity	Approx. NGR and Distance to Candidate Site (m)	Description of Existing (Baseline) View
	(Local road users)		intervening development prevents any discernible views to the Candidate Site from this location. Distinctive coniferous tree planting, much of which is located around the Candidate Site can be seen above the intervening development and vegetation
Viewpoint 6: A4042 Usk Road	**Low** (Local main road users)	331928, 203987 (530m)	Middle distant view towards the Candidate Site from a roadside layby off the A4042 Usk Road on approach to Penperlleni. Generally open view across pasture fields, with post and wire fences and field gate to foreground of view. Extensive layered vegetation left to right across the middle of the view screens / filters views to existing development on the southern edge of Penperlleni. As land falls away to the right of the view there are partially filtered views to new housing along Trem Yr Ysgol to the south of the Candidate Site off Usk Road. There are also heavily filtered views to 'Lyndhurst' glimpsed through layered vegetation. There's no clear view of the Candidate Site itself from this location.
Viewpoint 7: Public Right of Way (Footpath) 358/143/1 (within the Brecon Beacons National Park)	**High** (Users of PRoW)	329249, 204127 (2.7km)	Open elevated panoramic view form one of the highest points within the study area. View from Public Right of Way (Footpath) 358/143/1 (Brecon Beacons National Park) across valley floor to higher ground in the distance to the east. The settlement of Penperlleni is clearly visible within the centre of the view, interspersed by extensive tree, hedgerow and woodland within lower parts of the National Park in the foreground with scattered individual farmsteads and other properties. A very small part of the Candidate Site is visible through gaps in the layered vegetation, though at this distance it is not an immediately noticeable feature within the view. Beyond this are similarly glimpsed views to existing development at the junction of Usk Road / Park Y Brain Lane.

4.70 Baseline winter photographs, were taken at eye level from each of the representative viewpoints, using a digital SLR camera with a lens equivalent to a 48mm focal length in 35mm film format. These photographs are reproduced on Figures 4.1 – 4.8 and a description of the views has been included in Table 4.1 above. In order to further inform the appraisal contextual panoramas, from each of the Representative Viewpoints, have been provided. These are shown at Appendix B and show the winter (worst case) scenario for context, to better understand how the site fits into its' local landscape setting.

5 PROPOSED DEVELOPMENT

Description of Proposed Development

5.1 The proposed development has been defined as part of the Candidate Site consultation process, with Monmouthshire County Council, and discussions with Barratt and David Wilson Homes (South Wales) and would comprise approximately 85, 1 and 2 to 2.5 (select) storey, detached and semidetached residential properties on a developable area of 2.98 Hectares (Ha) (7.36 acres) at 30 dwellings per hectare (DPH), associated infrastructure and landscape proposals within approximately 4.3Ha on land to the west of Usk Road, Penperlleni, Monmouthshire. As illustrated on the Opportunities and Concept Plan (ref. 0711-1001, Focus on Design, February 2021) (Appendix A).

5.2 Development would be primarily of 2 storey residential properties across the potential development areas. Way finder buildings and gateway / feature buildings, possibly greater than 2 storeys, would be used sparingly at key locations through the site. For example, at the main landscape gateway to the development to frame parts of it and serve as a gateway feature, better identifying the proposed development.

5.3 The scheme would also include internal access roads, parking, footways and landscape planting as part of a wider green infrastructure led approach. The optimum access point for the proposed development would be from the A4042 Usk Road, to the north of the junction with School Lane, with principal, secondary and tertiary village streets internally, connecting areas of the development. The proposed development would require groundwork to create level platforms within the site for residential properties and areas of cut and fill in relation to the Sustainable Urban Drainage (SUDs) features and in order to overcome the varying topography locally to the site.

Designed-in Landscape Mitigation

5.4 The landscape proposals would be designed as an integral part of the proposed development. The proposals would retain the hedgerow within the Candidate Site where possible. A substantial length of existing hedgerow may require removal to accommodate the potential development areas, with further removal (in part) of existing hedgerows to allow for the optimum access point off Usk Road. Existing retained hedgerows to the site boundaries would be enhanced as part of wide buffer areas, at some 10m+ wide to the westernmost parts of the site incorporated as part of the Public Open Space (POS) and retain the landscaped edge at the transition to open countryside beyond. Within the eastern part of the proposed development a wide green corridor would be incorporated, including a landscape gateway to the development, within which would be opportunity for formal play features, e.g. Local Equipped Area for Play (LEAP), and informal play on the way (trim trail) features. The green corridor would also incorporate the main footpath / cycle path route to the north with a connection off Park Y Brain to access PRoW 358/68/1 and the wider PRoW network to the north. Also, within the southern part of the proposed development, within the landscape gateway POS, an area for an attenuation basin / swale would be included as part of the wider green infrastructure proposals through the site. There would be other areas of POS throughout the development which would include feature trees at key locations, maintaining and framing views to the wider countryside and particularly the Brecon Beacons National Park to the west. Internal blocks of planting, proposed native tree and hedgerows would link areas of POS, set along the access roads, as part of the green infrastructure / SUDs scheme.

5.5 These existing and proposed features would combine to provide a comprehensive landscape framework for the proposed development and retain / enhance the existing landscape structure of the site and reinforce the character of the local landscape, albeit that the proposed development would result in a new development edge. The landscape proposals focus on reflecting the local landscape character whilst minimising effects on the local landscape by:

- Retention of trees within the site where possible and hedgerows and trees along the site boundary to retain the character and ecological quality of the surroundings;
- Tree, shrub and hedgerow planting to enhance the site, provide screening and integration with the landscape and complement the proposed development and wider rural landscape;
- Use of native species planting, wildflower grassland and wildlife habitats to provide a scheme of landscape and ecological value appropriate to this location within the local landscape; and
- Amenity grassland with areas of bulb planting for amenity use and visual interest.

5.6 There is the potential for landscape and ecological benefit through the retention, enhancement and ongoing management of the existing hedgerows along the development boundaries and centrally within the site.

Conclusion

5.7 The site layout would enable the retention of the vast majority of the existing hedgerows and trees to the site's boundaries and centrally within the site, which would be protected as necessary during construction and enhanced using native species tree and shrub planting suitable to its location and prevailing ground conditions.

5.8 The landscape proposals seek to reflect the character of the Candidate Site and the surrounding landscape by establishing vegetation using native species appropriate to the local area, which would provide connectivity to the surrounding area, reinforce screening. The planting would form an enhancement to the existing site conditions and be an integral part of the green infrastructure led approach to the design.

6 APPRAISAL OF EFFECTS

Appraisal of Operational Effects

Effects on Landscape Character

6.1 This section describes the effects of the operational phase of the proposed development illustrated in the plan at Appendix A. The likely landscape effects that would result as a consequence of the proposed development are summarised below.

Summary of Potential Operational Phase Effects upon Landscape Resources

National Landscape Character Areas (NLCAs)

6.2 There would be direct effects on national landscape character related to NLCA ’31: Central Monmouthshire’ (Canol Sir Fynwy), within which the Candidate Site is located. The proposed development would result in an irreversible change of use of two small pastural fields on the edge the existing development of Penperlleni, to that of a residential development. With the exception of a length of existing hedgerows within the site and at the optimum access point off Usk Road that would be lost to accommodate the proposed development, the majority of existing boundary vegetation, including mature trees would be retained. This would partially retain the existing field pattern in this small enclosed part of a very large NCLA. As a proportion of the overall national landscape character area the change in landscape character of the Candidate Site, a small extension to the settlement of Penperlleni, would be small. The High sensitivity and negligible magnitude of change to the national landscape character area would result in a **Negligible adverse** effect upon the NLCA as a whole, where proposed changes would reflect the existing character in the immediate local landscape and adjoining development and would retain where possible the existing enclosed field pattern and boundary vegetation, characteristic of the Candidate Site and local landscape.

Regional / County Landscape Character (LANDMAP Aspect Areas)

6.3 The following paragraphs summarise the potential effects of the proposed development upon each of the five layers of LANDMAP Aspect Areas within which the Candidate Site sits.

Visual and Sensory Landscape Aspect Area: ‘Goytre Lowland’ (MNMTHVS042)

6.4 A large aspect area classified as an undulating and enclosed lowland landscape. The Candidate Site is wholly located within this aspect area and would therefore have a direct effect upon a small part of it. The Candidate Site is adjacent to the existing development of Penperlleni, to the east, separated by the A4042 Usk Road. It is therefore influenced by it, particularly within the easternmost parts of the Candidate Site which are nearest to the A4042 and settlement edge. Mature well maintained hedgerows to the Candidate Site’s northern and eastern boundaries and parts within the site itself, characteristic of the local area, would be largely retained and enhanced as part of the proposed development. This would maintain the physical and, to an extent, visual separation from the wider landscape to the north and west, albeit that the proposed development would create a newly defined development edge to Penperlleni and result in a break to the current settlement pattern which has generally followed a north to south route between the railway and A4042. The Candidate Site forms a small part of the rural countryside setting of Penperlleni, within

the wider parts of the aspect area and although there are scattered farmsteads and small hamlets within the wider aspect area, there would be a noticeable change at a site-based level with the permanent loss of the pastural grass field and development encroaching further to the west beyond the current settlement boundary of Penperlleni. However, being a small part of the overall aspect area on balance, when considering the aspect area as a whole, there would be a **Minor adverse** effect, upon an aspect area of High value and sensitivity, as a result of the proposed development, a small extension to the existing urban edge of Penperlleni The overall character of the wider aspect area would be unaltered by the proposed development.

Cultural Landscape Aspect Area: 'Lower Usk River Valley' (MNMTHCL047)

6.5 The Candidate Site is located entirely within aspect area MNMTHCL047. This aspect area is classified as rural. However, the small part of the aspect area within which the Candidate Site is located is immediately adjacent to an urban area, Penperlleni, separated from it by the A4042 which contributes to the urban character of this small part in contrast with the wider aspect area. A small part of the overall aspect area would be directly affected by the proposed development with it becoming an extension to the neighbouring residential development to the east, creating a new development edge to this part of Penperlleni. The proposed development, like adjacent development, would be located in what could be considered a valley bottom with rising land east and west, although there is noticeable topographical variation locally, with substantial vegetative cover enclosing this part of the aspect area. The proposed development would therefore not be readily noticeable in views from the surrounding landscape due to substantial layered vegetation, particularly in summer, apart from on higher ground, but would be an obvious change at a local level. This aspect area is evaluated within LANDMAP as high and would therefore be of high sensitivity to the development proposed. Overall, it is considered that there would be a **Minor adverse** significance of effect upon the overall aspect area.

Geological Landscape Aspect Area: 'Llanover' (MNMTHGL045)

6.6 The Candidate Site is an area of undulating topography. With locally higher ground to the northernmost parts of the Site, bordering Park Y Brain Lane, with locally distinct landform and small 'valley' depressions throughout, and a low point evident within the southernmost part of the Candidate Site adjacent to the A4042. Dependent on its final layout, there may be a requirement for earthworks and / or cut and fill locally within the Candidate Site to accommodate a residential development. As a result, there would be a direct affect upon a small part of the geological aspect area, limited to the Candidate Site itself. The overall evaluation of the aspect area is High with the sensitivity considered to be high. However, the loss of geological features would be small and isolated to the Candidate Site itself. As such, there would be a **Minor adverse** significance of effect upon the aspect area as a whole.

Landscape Habitat Aspect Area: 'Area surrounding Litte Mill' (MNMTHLH124) and 'Farmland to W. of Llanover' (MNMTHLH067)

6.7 The easternmost parts of the Candidate Site are located within MNMTHLH124, while the majority of the Candidate Site is located within aspect are MNMTHLH067 and would have a direct effect upon a very small part of them. The overall LANDMAP evaluation of the aspect areas is Moderate, a generally low value improved grassland habitat with some small areas of higher value habitat which may well support some key species, such as a strong network of broad leaved hedgerows and woodland blocks and presence of the Monmouthshire-Brecon Canal. The proposed development would result in the loss of a small area of improved grassland, not considered to be rare throughout the aspect area, with other habitats including trees and hedgerows to the boundaries and centrally largely retained with loss to accommodate the access roads and development areas. As such, there would be a balance of adverse effects and some beneficial

effects with the retained and enhanced vegetation. At a site-based level it is considered that the proposed development would result in a **Moderate adverse** significance of effect with the loss of grassland habitat of medium sensitivity. The aspect area as a whole would experience a **Negligible adverse** effect, approaching neutral, as there would be no effect on habitats in the wider area.

Historic Landscape Aspect Area: 'Goetre' (MNMTHHL055)

6.8 The historic settlement pattern of this small part of a large aspect area, within which the Candidate Site is located, has seen the larger settlements at Penperlleni, a road junction cluster, and the linear settlement of Little Mill; both settlements have seen expansion since the mid-19th century and in more recent years, i.e. the development to the south of Folley View Close. Expansion has generally followed the line of the railway and A4042, gradually pushing the development edge of Penperlleni further south. The proposed development, being west of the A4042, would go against this pattern of expansion and create a new development boundary of Penperlleni. The overall evaluation of the aspect area is high and, being influenced by neighbouring development it is considered to be of Medium sensitivity to the type of development proposed. It is anticipated that the proposed development would result in a **Minor adverse** effect upon the overall aspect area. Although locally the significance of effect is considered to be **Moderate adverse**, with the proposed development generally going against the historic north to south pattern of expansion.

6.9 There would be an indirect effect on the adjacent aspect areas within the wider 3km study area. Significance of effect upon aspect areas outwith the Application Site is adjudged to be no greater than **Neutral.**

Local Landscape Character

Local Landscape Character Area (LLCA) PE02: Penperlleni

6.10 At a local level, the Candidate Site is located entirely within Local Landscape Character Area (LLCA) PE02: Penperlleni, as derived from the Monmouthshire County Council Landscape Sensitivity Update Study (October 2020). The Candidate Site is outwith the development area of Penperlleni and is considered to be in countryside. The proposed development of approximately 85 residential dwellings with associated infrastructure and landscape, would result in a permanent change of use for the Candidate Site from pastural / agricultural fields to that of a residential development. Characteristic field boundary vegetation, to the site's boundary, would be largely retained partially maintaining the characteristic field pattern. It is likely that substantial groundworks and cut and fill activities would be required to accommodate the proposed development. As a result, there would be a noticeable erosion of characteristic undulating landform within the Candidate Site, although elements of this would be retained as part of the POS proposals. Loss of existing features would be offset by the introduction of a planned landscape scheme on the site. Including a large green corridor north to south within the eastern part of the proposed development and enhancements to existing retained boundary vegetation.

6.11 With the landscape structure, including boundary hedgerow and tree vegetation retained, where possible, and enhanced as part of the proposed development, the site would remain visually enclosed in views.

6.12 The proposed development would introduce additional residential properties into the local landscape. With existing development in the local landscape predominantly residential the proposed development would not alter the overall character of the local area perse. However, the proposed development would be in an area outside the current development boundary of Penperlleni and generally go against the historic north to south pattern of expansion. The change would therefore not be uncharacteristic of recent development but be at slight odds to it. Albeit that there is recent development to the east beyond the railway / road corridor. The inclusion of POS

areas to the western edge of the proposed development would help to maintain the landscape buffer to the wider countryside to the west, an important transition area to the Brecon Beacons National Park.

6.13 The direct significance of effect on the site area and small part of LLCA PE02 as a whole would be **Moderate adverse**. The well contained nature of the Candidate Site, within a landscape structure supplemented by new landscape planting, would limit the effects on the wider character area.

Effects on Visual Receptors

Potential Effects upon Views

6.14 An assessment of potentially significant (Adverse or Beneficial) effects upon views from the Representative Viewpoints is included in the following section. During the operational phase visual effects arise as a result of the introduced residential development. The proposals would have a degree of influence, particularly in local views in close proximity to the Candidate Site albeit that the proposed development would largely appear as an extension to existing residential development. The replacement of two medium sized pastural fields with that of a well-designed residential development would be an obvious change in view for receptors local to the site.

Potential Effects on Visual Receptor Groups

Residential Receptors

6.15 Residential properties have been identified within 500 m of the Application Site. The closest properties include rear and front elevation oblique views for residents of some properties at the end of Folly View Close and primarily upper storey rear elevation views for residents of properties along School Lane. Residents of properties along the A4042 ('Lyndhurst') and Park Y Brain Lane (Numbers 1 and 2 and Goytrey House Farm) would have near distance views.

6.16 'Lyndhurst', a large, detached property off Usk Road, is the nearest residential property to the Candidate Site and therefore proposed development. A mature hedgerow to its eastern boundary and outbuildings to the north, limit ground floor views to the site, particularly in summer. There are a number of small upper floor side elevation windows, orientated to the north east, which overlook the Candidate Site and have views of existing development within Penperlleni available, interspersed with mature tree cover. The proposed development includes a large landscape gateway to the southernmost corner of it. As a result, on completion, direct views north east from Lyndhurst's upper storey windows would remain, with generally open views towards residential properties off School Lane. However, the landscape gateway would include an open SUDs feature and likely play feature and the introduction of a potential gateway feature building at the development entrance would be a noticeable addition in direct views. The remainder of the proposed development, as a whole, would not be visible, though the southernmost potential development area would be a noticeable feature in oblique views from Lyndhurst, foreshortening available views to the wider landscape.

6.17 At winter Year 1, although seen obliquely and / or over an area of POS, due to its proximity the proposed development would result in a magnitude of impact of medium and significance of effect of **Major adverse**. At summer Year 15, proposed landscaping, particularly within the landscape gateway area, would be fully matured. Further screening potential views of the proposed development in direct and oblique views. Though partially screened / filtered, the proposed development would remain a noticeable feature. It is considered that the magnitude of impact at summer Year 15 would remain as medium, however, the matured landscape proposals particularly to the POS area would result in a reduction in the significance of effect being **Moderate adverse**.

Albeit that it is acknowledged that 'Lyndhurst' is owned by the landowner within which the Candidate Site is located.

6.18 Properties at the end of Folley View Close would have oblique front and rear elevation views, across the junction of School Lane / Usk Road towards the proposed development. Intervening vegetation, fencing, and neighbouring properties would partially screen views, particularly from ground floors, although more open channelled views may be available from upper floors. As a result, there would not be an appreciation of the development as a whole from these properties. The magnitude of impact upon views for these high sensitivity receptors would be small leading to a **Minor adverse** significance of effect in winter and summer.

6.19 Substantial roadside and rear garden vegetation to properties off School Lane would similarly limit views to the proposed development, particularly from ground floor views. However, there would be more open direct views available for first floor windows from a small number of residential properties, including Homeleigh and Tamarind. Long distance views towards higher ground to the west (Brecon Beacons) would remain from these properties although interrupted by the introduction of the proposed development. The landscape gateway at the entrance of the proposed development, would result in it being set back from Usk Road. Though it would be an obvious feature within views from these properties, which currently look onto open fields. The magnitude of impact upon views for these high sensitivity receptors would be medium leading to a **Moderate adverse** significance of effect in winter, albeit from upper floor rear elevation private views only. During summer, Year 15, the proposed landscape within the landscape gateway would have matured. As a result, it is considered that the proposed development would be partially screened from views. Although, due to its close proximity and higher ground on site, it is likely that the proposed development would remain visible above proposed landscaping, particularly gateway / feature buildings which would likely be taller and closer within views. The proposed landscape would soften potential views to the proposed development, though it would remain noticeable. By summer Year 15 the magnitude of impact would reduce to small, with the significance of effect reducing to **Minor adverse**.

6.20 Numbers 1 and 2 Park Y Brain Lane, in close proximity to the Candidate Site, would have generally open top floor rear elevation views to the proposed development. Though out buildings, fencing and other general development would interrupt these views, the proposed development would be a noticeable feature, bringing development into the immediate foreground and obstructing existing views to Lyndhurst to the south west and partially obstructing available views to the wider landscape, although views to higher ground would remain available for upper stories. The magnitude of impact upon views for these high sensitivity receptors would be medium leading to a **Major adverse** significance of effect in winter, albeit from upper floor rear elevation private views only. At summer Year 15, when enhancements to the existing vegetation at the easternmost boundary would take effect, the proposed development would be generally broken up but remain a noticeable feature foreshortening available view. The resultant magnitude of impact would remain at medium, though the likely significance of effect would be reduced to **Moderate adverse**.

6.21 By contrast, existing vegetation surrounding Goytrey House to the north, off Park Y Brain Lane, including large coniferous trees / hedges to its easternmost boundary, would partially filter views to the proposed development. Resulting in the full extent of the proposed development not being fully appreciated in oblique front elevation views from this property. There would, however, be an appreciation of the northern and westernmost parts of the proposed development in oblique and some more direct front elevation views. Seen above the low clipped front garden hedgerow and through and above existing field boundary hedgerows and trees to the western and northern site boundaries, particularly in winter. The proposed development would result in development being brought closer in views, where glimpsed views to 'Lyndhurst' and properties off School Lane are currently available, though heavily screened / filtered by existing trees. Proposed development would be set back from the northern and western boundaries, which would be enhanced as part of the development with additional landscape treatment. In winter, at Year 1, additional landscape

mitigation would have limited screening effects. As a result, the proposed development would be a noticeable addition to oblique views form Goytrey House. During summer, at Year 15, landscape proposals would have matured and therefore views to the proposed development would be less noticeable. However, due to the close proximity to it, the proposed development would remain a visible and noticeable feature within views from this property in winter and summer. The magnitude of impact upon views for this high sensitivity receptor, at winter Year 1, would be medium leading to a **Moderate adverse** significance of effect in winter. In summer months (Year 15), although remaining a noticeable feature, it is anticipated that the magnitude of impact would remain medium, but the significance of effect would be reduced to **Minor adverse**.

6.22 Maes-Y-Beryn to the north of the Candidate Site off the A4042 Usk, has a generally open southern elevation with the exception of a mature hedgerow. There are a number of small windows to its southern side elevation with direct views towards the Candidate Site. Mature hedgerow planting and other garden vegetation to its southern boundary would curtail potential views from ground floor windows, as well has intervening vegetation, undulating topography and existing built form. Views from upper floors would be generally open, with upper stories of the northern part of the proposed development seen in middle distant views, above and in between intervening hedgerow and tree planting. The proposed development would likely be seen as a continuation of built form adjacent to numbers 1 and 2 Park Y Brain and filling the gap to Goytre House. Particularly as the site generally falls away to the south, so there would be limited appreciation of the overall proposed development. Distant views to higher ground to the south would remain visible. The busy A4042 Usk Road would remain a feature in the foreground of views, interrupting it. The magnitude of impact upon views for this high sensitivity receptor, at winter Year 1, would be small leading to a **Minor adverse** significance of effect in winter. In summer months (Year 15), landscape buffer enhancements to the northern boundary would be fully mature. As a result, there is likely to be limited appreciation of the proposed development within views from Maes-Y-Beryn, with the view being not dissimilar to the existing situation. The resultant magnitude of impact and significance of effect would be reduced as a result, to negligible and **Negligible adverse** respectively.

6.23 From other residential properties, within the wider study area, although there would be potential views to the proposed development, it is anticipated that with the exception of local views detailed above the proposed development would likely be seen as a small extension to the existing residential development edge of Penperlleni therefore, the significance of effect is not likely to be any greater than **Minor adverse**. With many properties surrounded by substantial vegetation and / or outbuildings, including Beechwood House and Goytrey House Farm to the west, it is considered that many properties would have a very limited or no view of the proposed development, particularly in winter.

Public Rights of Way

6.24 Views of the Candidate Site gained by people using the surrounding right of way network are very limited due to the limited number of PRoW in the local landscape and high level of intervening vegetation, development and / or topographical variation. No open views of the proposed development have been identified from the closest PRoW, off Park Y Brain Lane No. 358/67/1 (Representative Viewpoint 3) to the north of the Proposed development. Within the wider study area, the ZTV (Figure 2) has indicated potential intervisibility to a limited number of other PRoW, including 358/93/2 (Representative Viewpoint 5), and on higher ground to the west 358/143/1 (Representative Viewpoint 7).

6.25 From PRoW 358/67/1 to the north, glimpsed views to existing development, through gaps and over hedgerow vegetation is already a feature of the view. The proposed development would add to this and bring development closer in the views, though the majority of the proposed development would be screened from view. Although visible, the proposed development would not result in a substantial alteration to the existing (baseline) view and would represent a small magnitude of impact and **Minor adverse** significance of effect in winter Year 1. At summer Year

15, with landscape buffer enhancement to the northern boundary and with the green corridor matured, potential glimpsed views to the proposed development would be further restricted. It is anticipated that this would result in the magnitude of impact of the development itself being negligible and, with the screening effect of the landscape proposals, a significance of effect of **Minor beneficial**, with the proposed landscaping having a beneficial effect, closing off potential glimpsed views and continuing the vegetated line along Park Y Brain Lane.

6.26 Potential views form the west would be heavily filtered due to intervening layered vegetation, even in winter. Residential development, at the southern edge of Penperlleni already seen in long distance views from the west are an existing feature within views. As a result, although there would be glimpsed heavily filtered views available from PRoW 358/143/1, the proposed development would not alter the existing situation. In views from the west, within the Brecon Beacons National Park, at a distance of some 2.7km at its nearest point, any potential changes in view would likely be indiscernible for the casual observer resulting in a **Neutral** significance of effect for high sensitivity receptors in winter and summer.

Industrial and Commercial Premises

6.27 There is farming / light industry / commercial properties, including Goytrey House Farm, the Goytre Arms and Goytre Car Company, to the immediate north west and east of the Candidate Site, with the Goytre Car Company a little further to the north east, off the A4042 Usk Road.

6.28 A largely intact field boundary hedgerow, undulating topography and mature trees would partially screen / filter possible views to the proposed development from these premises. Although engaged in activities that would, in general, occupy receptors attention. It is anticipated that the proposed development would be noticeable within views from the rear of Goytrey House Farm to the north west, seen over intervening fields and hedgerows, partially screened by existing tree planting, partially foreshortening available views and bringing the development edge of Penperlleni, already a feature in glimpsed views, closer in views. At winter Year 1, the magnitude of impact upon receptors of low sensitivity would be medium resulting in a **Minor adverse** significance of effect at winter Year 1. At summer Year 15, landscape buffer enhancements at the westernmost boundary would further limit views, although, due to the relative distance, the proposed development would likely still be visible. Existing and proposed landscape enhancements in full leaf would slightly reduce the potential magnitude of impact of the proposed development, to small, resulting in a significance of effect of **Negligible adverse**.

6.29 The Goytre Arms Public House is in close proximity to the easternmost boundary of Candidate Site. However, with no widows to its western elevation and extensive hedgerow planting to its boundary with Usk Road, potential views to the proposed development would be limited. Users would gain glimpsed oblique views, and heavily filtered views from the front and rear gardens / courtyard towards the proposed development during hours of operation. The magnitude of impact of the proposed development on glimpsed views from the Goytre Arms is anticipated to be small, resulting in a **Minor adverse** significance of effect at winter Year 1 and summer Year 15. Glimpsed views form the front courtyard would be generally seen in the context of existing development at the junction of the A4042 Usk od and Park Y Brain Lane.

6.30 The Goytre Car Company, to the north east, is located off the A4042 Usk Road and, like much of the existing development at the edge of Penperlleni, is set back and slightly below the level of the road. Extensive roadside vegetation, to the western edge of the A4042, set slightly above the road existing development would limit potential views to the proposed development. The front elevation of the Goytre Car Company is predominantly glazed, however with the forecourt occupied by several cars and the busy A4042 interrupting views it is anticipated that there would very limited appreciation of the proposed development from users. At winter Year 1, there would be a magnitude of impact of negligible, resulting in a **Negligible adverse** significance of effect. Landscape buffer enhancements to the northern boundary, including the green corridor, would

further screen potential views. Similarly, to other views from the north, this would result in some beneficial effects. It is anticipated that the magnitude of impact and significance of effect upon views from the Goytre Car Company, at summer Year 15, would be reduced to No Change and **No Effect** respectively.

Surrounding Roads Network

6.31 Receptors using the A4042 Usk Road to the east of the Candidate Site, would gain glimpsed transient views and some more open views from higher parts of the road, seen above the existing retained hedgerow. The entrance to any potential development and the potential gateway feature buildings would be particularly noticeable, allowing glimpsed short-lived views to parts of the wider development along the main access road. As the road lowers and roadside embankment rises views to any proposed development would become less apparent on approach to the junction with Park Y Brain Lane. Although likely available, views to any proposed development may go unnoticed by many road users with views largely seen as a continuation of the development edge of Penperlleni. These low sensitivity receptors are transient and would experience a small magnitude of impact leading to a **Negligible adverse significance of** effect at winter Year 1 and summer Year 15.

6.32 Receptors using Park Y Brain Lane, heading west out of Penperlleni, would gain transient views to any proposed development to the northernmost edge. Seen above the existing roadside hedgerow and set back, any proposed development would not be immediately apparent and would generally be seen as a continuation of the development line. However, any proposed development would be a noticeable change to views available, foreshortening views to the wider landscape. There would be no appreciation of the development as a whole within views from Park Y Brain Lane, with development partially broken up by the proposed green corridor and landscape buffer areas to the northern edge. These low sensitivity receptors are transient and would experience a medium magnitude of impact leading to a **Minor adverse** significance of effect at winter Year 1. Reducing to small and **Negligible adverse** respectively at summer Year 15.

Effects upon Receptors at Representative Viewpoints

6.33 The following text provides further details of the effect on the seven viewpoints shown on Figure 4. Photographs are provided at Figures 4.1 – 4.8.

Viewpoint 1: A4042 Usk Road

6.34 Vehicle travellers using the A4042 Usk Road or pedestrians using the footway would gain oblique views, and some more direct as the road turns slightly to the north as it passes the site, of the proposed development. At a dip in the road and where the roadside hedgerow is at its lowest, there would be transient views to parts of the proposed development on land rising gently north from Usk Road. Immediately within the foreground of the view, a large area of POS (the Landscape Gateway) would result in the new housing not being immediately apparent, though still a noticeable feature within the view. Existing roadside hedgerow would partially screen views, particularly for low sided vehicles. As Usk Road continues to the right, beyond the view, it falls away with the grass verge and hedgerow being higher. As a result, the proposed development set back from the road would become less apparent, although potential gateway / feature buildings immediately adjacent to the Usk Road entrance, at some 2.5 stories would be immediately apparent on approach to Penperlleni. The newly created entrance / exit to the proposed development, along with taller gateway buildings, would be the most noticeable change to this section of Usk Road and allow potentially glimpsed transient views to parts of the proposed development internally glimpsed along the main access road, framed by the gateway buildings. Additionally, the proposed development would foreshorten views, bringing development closer and

obstructing views available to the wider landscape. Although existing mature parkland trees, along Park Y Brain Lane and partial views to higher ground would likely remain. There would be substantial vegetation within the POS, at the landscape gateway, and within the green corridor which ultimately would break up the mass of the development and partially screen views from Usk Road. Although screening effects of proposed vegetation would have limited effects until fully matured at summer Year 15.

6.35 The sensitivity of receptors in vehicles is low and pedestrians using the adjacent footway is medium and they would experience a medium magnitude of impact resulting in a **Minor** to **Moderate adverse** significance of effect at winter Year 1 and summer Year 15, with the proposed development redefining the development edge and entry to the centre of Penperlleni. Although at summer Year 15 the screening effects of retained and proposed vegetation would be greater, due to the close proximity of the development and change in the view, it is anticipated that the significance of effect would not be reduced.

Viewpoint 2: Park Y Brain Lane

6.36 Like the effects described for Representative Viewpoint 1, road users would gain oblique transient views to the proposed development along this quiet lane. Glimpsed above roadside hedgerows, generally intact and well maintained at a low level, with some more open views available through field access gates. Views to new housing would be partially screened / filtered by existing and proposed vegetation within the northern buffer area, though the screening effect of this landscape intervention would not be fully effective until it has become established. Though set back some 10-15m from the boundary with Park Y Brain Lane, new residential properties would be an obvious addition to the view, foreshortening it and partially obstructing available views of the wider countryside to the south from this location. The tops of mature parkland trees within the grounds of Beechwood House and on rising ground to the south west would remain visible. With views to the Brecon Beacons also remaining a characteristic feature to the right of the view. The proposed development would be a noticeable extension, particularly at winter Year 1, to the west of Penperlleni continuing the built edge along Park Y Brain Lane and infilling part of the gap between Penperlleni and scattered development to the west (i.e. Goytrey House Farm). Albeit that it would be set back from the lane. Also, the green corridor, a wide area of landscaping included within the eastern part of the proposed development, would largely maintain some views to the south towards Usk Road and ‘Lyndhurst’ for road users travelling east.

6.37 The sensitivity of receptors in vehicles, using a rural lane of this type, as well as pedestrians using the lane as part of the PRoW network could be considered to be Medium. They would experience a medium magnitude of impact resulting in a **Moderate adverse** significance of effect at winter Year 1. At summer Year 15 the screening effects of retained and proposed vegetation within the northern landscape buffer would be greater, although views to the proposed development would still be apparent. It is anticipated therefore that the magnitude of impact and significance of effect would be reduced slightly, to small and **Minor adverse** respectively in transient views. With views for pedestrians likely to be more noticeable because of the relative speed of travel.

Viewpoint 3: Public Right of Way (footpath) 358/67/1

6.38 Walkers using this PRoW would have glimpsed views to the proposed development, over field boundary vegetation and between mature trees. Due to undulating topography and existing vegetation, particularly surrounding Goytrey House, there would be no appreciation of the proposed development as a whole. Glimpsed views available would not be dissimilar to views of existing development currently available, although the proposed development would be marginally closer within the view and be of a different style. As such, glimpsed views to the proposed development would not be substantially different to those currently available to users of the PRoW, travelling generally south towards Park Y Brain Lane. With land rising to the south of the view,

existing views to higher ground and the treed skyline would still be available. Any glimpsed views available to the proposed development would likely go unnoticed by the casual observer. As such, it is anticipated that the proposed development would not have a particularly noticeable effect upon views available from this location as the character and nature of the view would be largely unchanged at winter Year 1. By summer Year 15, the landscape buffer enhancements to the northern boundary and within the green corridor would be fully established. This would add additional tree planting to an already substantially treed outlook and effectively screen development from view.

6.39 The sensitivity of receptors using the PRoW is high. People in this location would experience a negligible magnitude of impact resulting in a **Negligible adverse** significance of effect at winter Year 1. At summer Year 15, with the increased landscaping, development (existing or proposed) would be largely screened from available views. Although glimpsed transient views could still be available, it is anticipated that these would go unnoticed to many. The magnitude of impact of the proposed development, when considering the landscape enhancements, would be small, resulting in a **Minor beneficial** effect with views to development being substantively screened.

Viewpoint 4: A4042 Usk Road

6.40 Vehicle users and pedestrians on the roadside footway, travelling generally south to the centre of Penperlleni, would have glimpsed view to a small part of the proposed development. Seen above roadside hedgerows and in between the existing residential properties at the Park Y Brain / Usk Road junction. Similarly, to Representative Viewpoint 3, existing development is visible within this gap with views to properties off School Lane. However, with substantial intervening vegetation, they are less noticeable than with viewpoint 3 and likely not noticeable in summer. There are also a number of vertical elements, including pylons and street lighting within a cluttered view. Proposed development would fill this gap, screening views to existing development off School Lane and much of the existing tree planting along Usk Road, with taller trees visible above, as the proposed development partially breaks the skyline. The upper parts of residential properties would likely be visible within the gap and the roofline seen across the whole view at a height not dissimilar to that of 'Lyndhurst', currently seen above the garage / outbuilding of numbers 1 and 2 Park Y Brain Lane. The proposed development, added to the view, would result in a visible increase in built form to the west of Penperlleni, extending / in filling it's developed edge. Changes to the view would be more apparent to pedestrians with longer periods of views available than short period transient views from passing motorists. In summer, it is anticipated that the layered vegetation to the north of the proposed development and within the green corridor the proposed development, at maturity (Year 15), being in full leaf would largely screen views to it. As a result, the additional landscape planting would be a visible improvement to views available.

6.41 The sensitivity of receptors in vehicles is low and pedestrians using the adjacent footway is medium and they would experience a small magnitude of impact resulting in a **Minor adverse** significance of effect at winter Year 1. At summer Year 15, with the increased landscape planting, development (existing or proposed) would be largely screened from available views. Although glimpsed transient views could still be available, it is anticipated that the available view would not be substantially different to that of the baseline. With visible screen planting as a result of the proposed landscape enhancements. The magnitude of impact of the proposed development, when considering the landscape enhancements, would be negligible, resulting in a **Negligible beneficial** effect with views to development being partially screened, though still glimpsed through and above proposed vegetation.

Viewpoint 5: Star Road at junction with Public Right of Way (footpath) 358/93/2

6.42 Due to the existing development, the village of Penperlleni, undulating topography and in particular existing mature tree planting, potential views to the proposed development would be very limited.

There would be potentially glimpsed views to the roofline of the proposed development, seen through and in the context of the existing development of Penperlleni. As such, the proposed development would not break the existing development line and so not noticeably alter the existing view. In summer (Year 15), intermittent tree planting within the proposed development, having matured, would further limit potential views to it and contribute to the well treed outlook of the view. It is anticipated that there would be no discernible view of the proposed development within the summer scene.

6.43 The sensitivity of local rural road users and pedestrians using it as part of the PRoW network could be considered as medium. As a result of the proposed development being theoretically visible from this location, though in the context of existing visible development, it is anticipated that they would experience a negligible magnitude of impact, leading to a **Negligible adverse** significance of effect (approaching neutral) at winter Year 1. Reducing to No Change and **No Effect** respectively at summer Year 15.

Viewpoint 6: A4042 Usk Road

6.44 Intervening vegetation, including substantial roadside hedgerows, and undulating topography would prevent views of the proposed development and indeed Penperlleni as a whole from the majority of the A4042 Usk Road on approach from the south. At the crest of the road, around Blackberry Barn, a gap in roadside vegetation allows a glimpsed transient view, before the roadside hedgerow continues and the road fall away. With similar glimpsed views at the junction with Croes-Y-Pant Lane. Substantial linear woodland and individual trees around Goytrey House Lodge and Lyndhurst would screen / heavily filter potential views to the proposed development in winter, with no discernible views likely in summer.

6.45 The sensitivity of receptors in vehicles using this main road is low and they would experience a negligible magnitude of impact, within very short period views, resulting in a **Negligible adverse** significance of effect at winter Year 1, approaching neutral with the proposed development likely to go unnoticed by viewers whose primary focus would be on the road. Reducing to No Change and **No Effect** respectively at summer Year 15.

Viewpoint 7: Public Right of Way (Footpath) 358/143/1 (Brecon Beacons National Park)

6.46 The ZTV (Figure 3) has indicated potential intervisibility to the proposed development, from higher ground to the west within the Brecon Beacons National Park. However, at a distance of some 2.7km and set within the context of this open and expansive panoramic view, it is anticipated that the proposed development would be barely discernible. Additionally, extensive woodland and tree planting to the west of the proposed development, around Beechwood House and the Monmouthshire-Brecon Canal would screen the proposed development from views, even in winter, with more noticeable views to existing development within Penperlleni persisting. Once landscape proposals have established in Year 15, this would further screen any potential views and add to the wooded outlook.

6.47 The sensitivity of receptors using the PRoW is high. People in this location would experience a negligible magnitude of impact resulting in a **Negligible adverse** significance of effect at winter Year 1. At summer Year 15, with the increased landscaping having matured, the proposed development would be largely screened from available views. Although glimpsed views could still be available due to the elevation of the view, it is anticipated that these would go unnoticed by many casual observers. The magnitude of impact of the proposed development, would reduce to No Effect and with the increased screening potential to is anticipated that the significance of effect would similarly reduce to **No Change**.

7 SUMMARY

General

7.1 This report has assessed the potential landscape and visual effects of the proposed development of approximately 85 detached and semidetached residential units, on land to the west of the A4042 Usk Road, Penperlleni. The Candidate Site comprises three agricultural / pastural fields that are divided by existing largely intact hedgerows. The local landscape is defined by farmland with open fields with hedgerows, copses and woodland belts adjoining the settlement of Penperlleni and Little Mill to the south and smaller hamlets / farmsteads within the wider study area, connected by local roads. The proposed development would introduce a new residential development that would form a small extension to the existing development edge of Penperlleni.

Summary of Potential Landscape Effects

7.2 Direct changes that would occur in the LANDMAP aspect areas, within which the Candidate Site is located, would be as a result of the permanent change from agricultural / pastural fields to that of a residential development which would be an extension to the existing development edge of Penperlleni. The proposed development would result in the loss of large parts of existing field boundary hedgerows internally within the Candidate Site. However, retention and enhancement of existing boundary tree and hedgerow vegetation, considered to be not uncommon and of ordinary condition with no significant landscape designations, would be beneficial and contribute to the overall green infrastructure and biodiversity of the site without unacceptable adverse effects at a regional scale. Additionally, the enhanced landscape structure would help to enclose the site, minimising potentially adverse visual effects from views north and west of the site, while still allowing some views out across the wider landscape along a substantial green corridor within the proposed development and wide landscape buffer enhancements to the site's boundaries. The proposal would result in the loss of grassland and large parts of the existing hedgerow to the centre of the proposed development.

7.3 When considering the large Aspect Areas as a whole, the proposed development would result in no greater than a **Minor adverse** significance of effect, as direct effects would be on a very small, isolated part of landscape. When considering the effects upon the site itself, the proposed development would result in the permanent loss of farmland and its replacement with settlement, resulting in a **Moderate adverse** effect on this small part of the 'Goytre Lowland' Visual and Sensory Landscape Aspect Area (MNMTHVS042). The development would also lead to the permanent loss of improved grassland and partial loss of existing hedgerows to accommodate the internal access road(s), resulting in a **Minor adverse** significance of effect upon the overall Habitats Aspect Area, 'Goetre' (MNMTHHL055), increasing to **Moderate adverse** when considering the site itself. Albeit that the grassland habitat within the Candidate Site could be considered to be of lower value than other habitats present in the wider Aspect Area which would be unaffected by the proposed development.

7.4 At a local level, there would be a direct landscape characterising effect upon the small Local Landscape Character Area (LLCA) PE02, as derived from the Monmouthshire County Council Landscape Sensitivity Update Study (October 2020). The Candidate Site is located adjacent to the settlement boundary of Penperlleni within countryside as defined by the adopted LDP proposals map. As such, any development would result in those parts of the Candidate Site no longer being countryside, but part of the settlement. Further, development within the Candidate Site would result in a noticeable change in the pattern of development, which to date has been north to south between the railway line and the A4042 Usk Road and ribbon in form

Albeit, that a small amount of existing and relatively recent development has gone against this ribbon characteristic settlement, to expand it a little way east along Star / Plough Road and start to form a rounding off to the existing settlement.

7.5 The direct significance of effect on the site area and small part of LLCA PE02 as a whole would be **Moderate adverse**. The well contained nature of the Candidate Site, within a landscape structure supplemented by new landscape planting, would limit the effects on the wider character area. The inclusion of POS areas to the western edge of the proposed development would help to partially maintain the landscape buffer, setting of Penperlleni, and transition to the wider countryside to the west, an important transition area to the Brecon Beacons National Park.

Summary of Potential Visual Effects

7.6 The proposed development would be located on the western edge of Penperlleni, beyond its development boundary, but close to it. As a result, views to the proposed development from more distant views from the surrounding landscape would not be entirely uncharacteristic of baseline views and seen as a small addition to the existing residential development. Additionally, substantial layered vegetative cover and the undulating topography of the local landscape would limit the number of visual receptors in the wider area that would experience a noticeable change. The most noticeable effects upon views, acknowledged as adverse effects, would be at a very local level. Most notably, from Representative Viewpoints 1 and 2, in transient views for road users and pedestrians along the A4042 Usk Road and Park Y Brain Lane. With landscape buffer enhancement, to the northern boundary, beneficial effects have also been identified from local views (Representative Viewpoints 3 and 4).

7.7 At winter Year 1, a **Minor** to **Moderate adverse** and **Moderate adverse** significance of effect has been identified for Viewpoints 1 and 2 respectively. At summer Year 15, there would be a residual **Minor** to **Moderate adverse** significance of effect in transient views from Representative Viewpoint 1. The landscape gateway at the entrance to the development and green corridor would have some beneficial effects and partially screen / filter views to the proposed development. However, it is anticipated that the proposed development would remain an obvious feature within the view on approach to Penperlleni, in particular the addition of the entrance allowing some more open views internally to the proposed development. Albeit short period transient views from relatively fast-moving vehicles.

7.8 The green corridor and, in particular, the landscape buffer enhancements to the northern boundary similarly have some beneficial effects upon views from Park Y Brain Lane (Representative Viewpoint 2) at summer Year 15. Enhancements, in full leaf, would screen / filter views to the proposed development in summer. However, due to the close proximity to the road, it is anticipated that the proposed development would remain a noticeable feature within oblique transient views. The significance of effect would be reduced slightly to **Minor adverse**.

7.9 The most notable beneficial effects, as a result of the proposed development and, more specifically, the green corridor and landscape buffer enhancements to the northern boundary would be from areas to the north, Representative Viewpoints 3 and 4. Existing development, within the view, is an existing feature to a varying degree from each location. As such, the addition of the proposed development, while adding to the built form would not have a marked influence on the view with a **Negligible adverse** and **Minor adverse** significance of effect respectively at winter Year 1. Landscape buffer enhancements to the northern boundary, at summer Year 15, would represent a noticeable beneficial effect. Particularly from Representative Viewpoint 3 and for much of the length of PRoW 358/67/1. It is anticipated that landscape enhancements would effectively screen any views to the proposed development, resulting in a **Minor beneficial** significance of effect.

Overview

7.10 Residential development within any part of the Candidate Site would result in a direct impact upon a small part of Local Landscape Character Area (LLCA) PE02, as derived from the Monmouthshire County Council Landscape Sensitivity Update Study (October 2020). The Candidate Site is located adjacent to Penperlleni and is therefore located in the open countryside in accordance with the Adopted LDP's proposal maps. As such, any development would result in those parts of the Candidate Site no longer being countryside, but part of the settlement, which would be similar for any allocation of undeveloped land adjacent to the settlement boundary. Further, development within the Candidate Site would result in a noticeable change in the pattern of development, which to date has been north to south between the railway line and the A4042 Usk Road and ribbon in form. Albeit, that a small amount of existing and relatively recent development has gone against this characteristic settlement, to expand it a little way east along Star / Plough Road and start to round off the settlement

7.11 Adverse landscape and visual effects, identified above, resulting from development within the Candidate Site, would be partially offset by appropriate landscape design and mitigation. Including, landscape buffer enhancement to all boundaries, a landscape gateway POS at the sites entrance and a substantial green corridor which, along with the landscape buffers, would help to maintain important views to the wider countryside and partially maintain the landscape setting of Penperlleni and the transition to the wider countryside.

FIGURES

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Study Area (3km
- Candidate Site
- Brecon Beacons National Park
- Ancient Woodland
- Statutory Access
- Listed Buildings
- Conservation
- Site of Special Scientific Interest

Monmouthshire County Council LDP 2011-2021

- Areas of Amenity

N

Sir Fynwy - Monmouthshire

Torfaen

0 265 530 m

© Crown copyright: All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the est of Usk Road, Penperlleni, Monmouthshire
Title	Landscape Planning Designations

Status	Drawn By	PM/Checked By
DRAFT	GL	PH
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
1		-

rpsgroup.com

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 1 Landscape Planning Designations.mxd

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Study Area (3km Radius)
- Candidate Site

Topography (mAOD)

- 14.00-36.25
- 36.25-58.50
- 58.50-80.75
- 80.75-103.00
- 103.00-125.25
- 125.25-147.50
- 147.50-169.75
- 169.75-192.00
- 192.00-214.25
- 214.25-236.50
- 236.50-258.75
- 258.75-281.00
- 281.00-303.25
- 303.25-325.50
- 325.50-347.75
- 347.75-370.00
- 370.00-392.25
- 392.25-414.50
- 414.50-436.75
- 436.75-459.00

N

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client: Baratt and David Wilson Homes (South Wales)

Project: Land to the est of Usk Road, Penperlleni, Monmouthshire

Title: Topography

Status	Drawn By	PM/Checked By
DRAFT	GL	PH
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
2		-

rpsgroup.com

0 265 530 m

© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 2 Topography_copy.mxd

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Study Area (3km
- Candidate Site
- Existing Development
- Woodland
- Representative Viewpoints
- ZTV (indicative extent of the surrounding area from which views of the proposed development may be available)

N

Note:
ZTV compiled assuming observer height as 1.5m at eye level, and takes into account screening effects of exising development at 9m and existing vegetation / woodland at a height of 12m.

Two origin points, from the approximate highest and lowest parts of the option site, has been used to illustrate the ZTV. It is based upon a maximum ridge height of a proposed residential development at 9.5m AOD.

OS Terrain 5 data has been used for generating the ground model.

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	Preliminary Zone of Theoretical Visibility (ZTV)

Status	Drawn By	PM/Checked By
DRAFT	GL	PH
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
3		-

rpsgroup.com

0 265 530 m

© Crown copyright All rights reserved -2021 License number 0100031673;10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.S

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 3 Preliminary ZTV.mxd



Representative Viewpoint 1: A4042 Usk Road

Land west of Usk Road, Penperlleni,
JSL3528

Date of photograph: 26/02/2020
NGR: 332157, 204483

Horizontal field of view: 39.6°
To be viewed at comfortable arms length

Figure: 4.1



Representative Viewpoint 2: Park Y Brain Lane	**Land west of Usk Road, Penperlleni,** JSL3528	Date of photograph: 26/02/2020 NGR: 332140, 204725	Horizontal field of view: 39.6° To be viewed at comfortable arms length	**Figure: 4.2**



Representative Viewpoint 3: Public Right of Way (footpath) 358/67/1	**Land west of Usk Road, Penperlleni,** JSL3528	Date of photograph: 26/02/2020 NGR: 332023, 205001	Horizontal field of view: 39.6° To be viewed at comfortable arms length	**Figure: 4.3**



Representative Viewpoint 4: A4042 Usk Road

Land west of Usk Road, Penperlleni,
JSL3528

Date of photograph: 26/02/2020
NGR: 332229, 204772

Horizontal field of view: 39.6°
To be viewed at comfortable arms length

Figure: 4.4



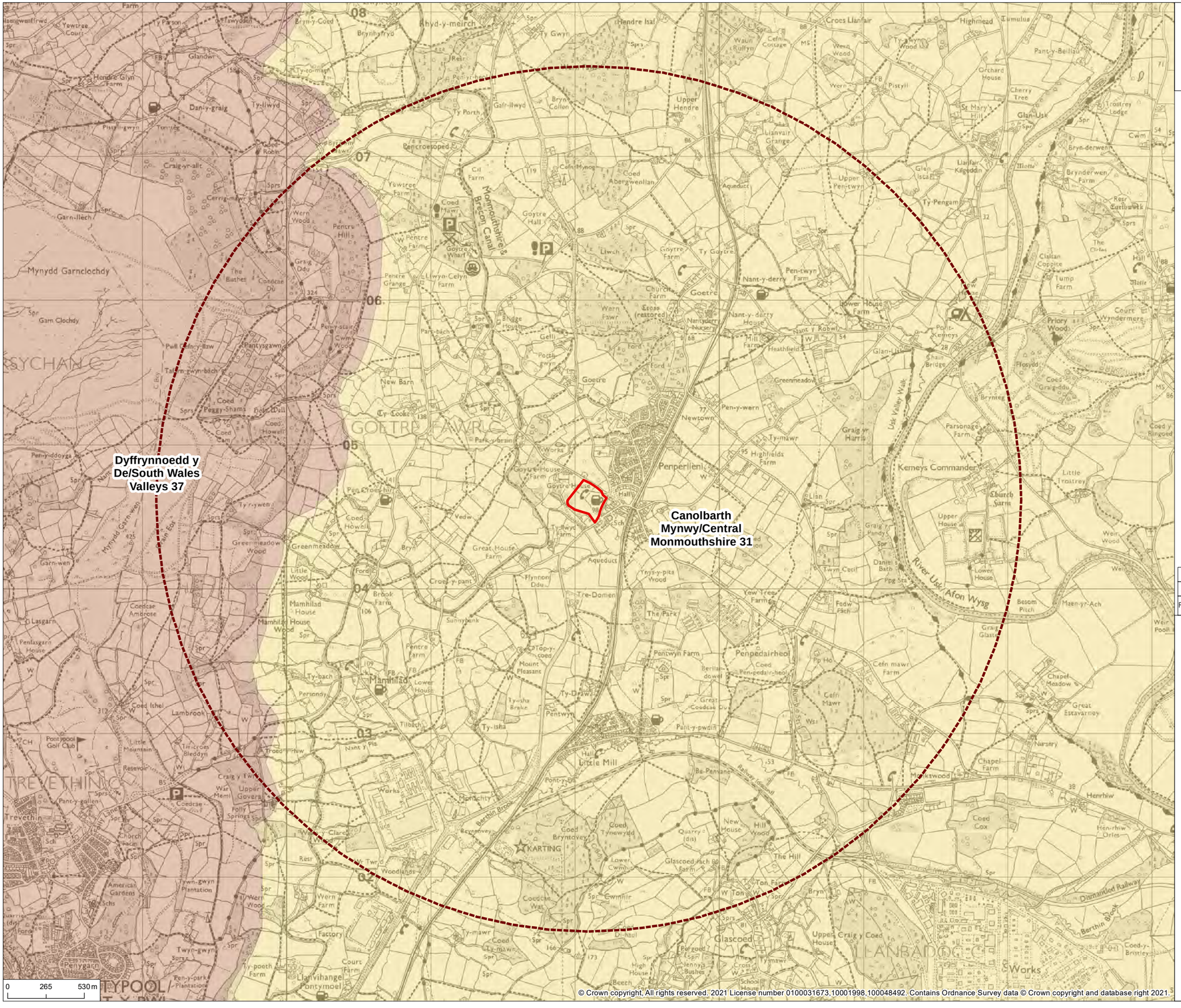
Representative Viewpoint 5: Star Road at junction with Public Right of Way (footpath) 358/93/2	**Land west of Usk Road, Penperlleni,** JSL3528	Date of photograph: 26/02/2020 NGR: 332956, 204740	Horizontal field of view: 39.6° To be viewed at comfortable arms length	**Figure: 4.5**



Representative Viewpoint 6: A4042 Usk Road	**Land west of Usk Road, Penperlleni,** JSL3528	Date of photograph: 26/02/2020 NGR: 331928, 203987	Horizontal field of view: 39.6° To be viewed at comfortable arms length	**Figure: 4.6**



Representative Viewpoint 7: Public Right of Way (Footpath) 358/143/1 (Brecon Beacons National Park)	**Land west of Usk Road, Penperlleni,** JSL3528	Date of photograph: 26/02/2020 NGR: 329249, 204127	Horizontal field of view: 39.6° To be viewed at comfortable arms length	**Figure: 4.7**


Dyffrynnoedd y De/South Wales Valleys 37
Canolbarth Mynwy/Central Monmouthshire 31
Penperlleni
Goetre
Goetre Fawr
Mamhilad
Pontypool
Trevethin
Llanvihangel Pontymoel
Glascoed
Kemeys Commander
Penpedairheol
Mynydd Garnclochdy
Garn-llech
Craig-yr-allt
Dan-y-graig
Hendre-Glyn Farm
Pencroesoped
Upper Hendre
Llanvair Grange
Croes Llanfair
Highmead
Pant-y-Beiliau
Glan-Usk
Bryn-derwen
Brynderwen Farm
Llanfair Kilgeddin
Ty-Pengam
Upper Pen-twyn
Aqueduct
Goytre Hall
Goytre Farm
Ty Goytre
Nant-y-derry
Pen-twyn Farm
Church Farm
Goytre Wharf
Monmouthshire & Brecon Canal
Llwyn-Celyn Farm
Pentre Grange
Pentre Hills
Coed Abergwenllan
Cefn-Mynos
Ty Gwyn
Rhyd-y-meirch
Brynhyfryd
Bryn-y-Coed
Ty Porth
Gafr-llwyd
Bryn Collen
Cil Farm
Yewtree Farm
Coed Hawl
Wern Wood
Pentre Hills
Graig Ddu
The Buthes
Coedcae Du
Mill Farm
Heathfield
Nant y Robin
Glan-Llisky
Chain Bridge
Greenmeadow
Pen-y-wern
Newtown
Ty-mawr
Graig yr Harris
Highfields Farm
Usk Valley Walk
Parsonage Farm
Priory Wood
Frosydd
Coed Graig-ddu
Court Wyndermere
Clatian Coppice
Tump Farm
Orchard House
Cherry Tree
St Mary's Hill
Trostrey Lodge
Little Trostrey
Church Farm
Upper House
Lower House
River Usk / Afon Wysg
Besom Pitch
Maen-yr-Ach
Graig Glas
Penpedairheol
Pentwyn Farm
Cefn mawr Farm
Chapel Meadow
Great Estavarney
Nursery
Chapel Farm
Henrhiw
Coed Cox
Dismantled Railway
Berthin Brook
Tynys-y-pita Wood
Yew Tree Farm
Foxy Pitch
The Park
Tre-Domen
Flynnon Ddu
Croes-y-pant
Aqueduct
Sunnybank
Top-y-coed
Mount Pleasant
Ty-Draw
Pentwyn
Ty-isha
Ty-isha Brake
Pant-y-pwdin
Cefn Mawr
Great Coedcae Du
Coed Pen-pedair-heol
Berllan-dowell
Pentre Farm
Lower House
Ty-bach
Persondy
Tilbach
Nant y Pis
Coed Ithel
Lambrook
Pontypool Golf Club
Little Mountain
Tir-croes Bleddyn
Reservoir
Craig y Twr
War Memi
Upper Govera
Folly Springs
Coedcae
Pant-y-gollen
Church Acre
Schs
Twyn-gwyn Plantation
American Gardens
Wern Farm
Factory
Court Farm
Ty-pooth Farm
Penygarn
Pen-y-park Plantation
Twyn-gwyn
Ty-mawr
Coed Ty-mawr
Coedcae Wat
Gwynnir
Lower Cwmhir
Coed Bryntovey
Quarry (dis)
Coed Tynewydd
Berthin Brook
Bryntovey
Works
Little Mill
Pont-y-pr
Be-Pannace
Railway Embankment
Hall
Pen-y-graig
Ty-Isaf
Ty-llwyd Farm
Great House Farm
Greenmeadow Wood
Coed Howell
Coed Peggy-Shams
Coed Cam
Coed Howell
Pantysgawn
Pwll Glyn-y-llaw
Tafarn-gwyn-bach
Cwm Wood
Pen-y-stair
Pont-y-gwyn
Gelli
Pant-bach
Bridge House
Ford
Goytre Wharf
New Barn
Ty-Looke
Park-y-brain
Goytre-House Farm
Pen Croes-hir
Coed Howell
Vedw
Ty-llwyd Farm
Great House Farm
Greenmeadow
Little Wood
Ford
Brook Farm
Mamhilad House
Mamhilad House Wood
Coedcae Amerose
Lasgarn
Penlasgarn House

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

Candidate Site

Local Landscape Character Areas (LLCA) (Monmouthshire Landscape Sensitivity Update Study, October 2020)

- PE01
- PE02
- PE03
- PE04
- PE05

N

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	Local Landscape Character Areas

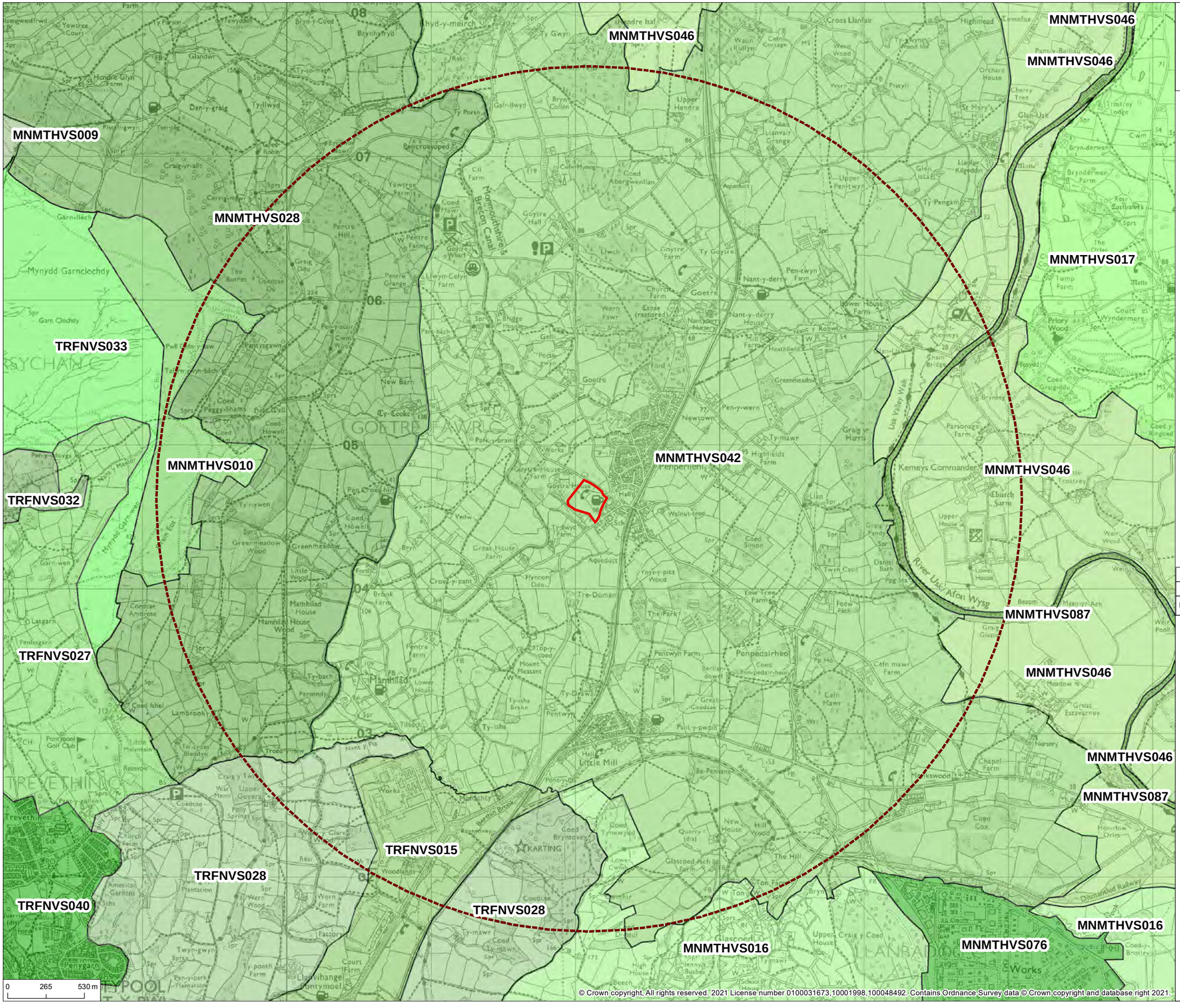
Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:10,000	JUL 2021
Figure Number		**Rev**
6		-

rpsgroup.com

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 6_Local Landscpae Character Areas.mxd

0 105 210 m

© Crown copyright. All rights reserved. 2021 License number 0100031673.10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.



© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

N

Legend

- Study Area (3km Radius)
- Candidate Site
- MNMTHVS009, Garnclochdy Hills
- MNMTHVS010, Mynydd Garnclochdy
- MNMTHVS016, Cilfeigan Park & Woodlands
- MNMTHVS017, Gwehelog
- MNMTHVS028, Blorenge scarp slopes
- MNMTHVS042, Goytre Lowland
- MNMTHVS046, Upper Usk Valley
- MNMTHVS076, Glascoed OS military base
- MNMTHVS087, River Usk
- TRFNVS015, Llanfihangel
- TRFNVS027,
- TRFNVS028, Twyn-Gwyn
- TRFNVS032,
- TRFNVS033,
- TRFNVS040,

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Visual and Sensory Aspect Areas

Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
7		-

rpsgroup.com

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 7_LANDMAP Visual and Sensory Aspect Areas.mxd

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

N

Legend

- Study Area (3km
- Candidate Site

LANDMAP: Visual and Sensory Aspect Areas

Overall Evaluation

- Outstanding
- High
- Moderate
- Low

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Visual and Sensory Aspect Areas Overall Evaluation

Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
8		**-**

rpsgroup.com

0 265 530 m

© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 8_LANDMAP Visual and Sensory Aspect Areas Overall Evaluation.mxd

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

N

Legend

- Study Area (3km Radius)
- Candidate Site

LANDMAP: Geological Landscape Aspect Areas

UID, AreaName

- MNMTHGL039, Bettws Newydd
- MNMTHGL040, Usk-Nant y Wilcae
- MNMTHGL045, Llanover
- MNMTHGL046, Coed-y-Prior
- MNMTHGL047, Mamhilad
- MNMTHGL048, Pentre Hill
- MNMTHGL050, Blorenge
- MNMTHGL058, Glascoed
- MNMTHGL059, Llanfair Kilgeddin
- MNMTHGL060, Kenys Commander
- MNMTHGL061, Brynderwen
- MNMTHGL062, Llancayo
- MNMTHGL063, Little Mill
- MNMTHGL064, Pettingale
- TRFNGL009, Afon Llwyd
- TRFNGL010, Llanfrechfa
- TRFNGL011, Coedcae Wat
- TRFNGL013, Plas y Coed
- TRFNGL020, Mynydd Garn Clochdy
- TRFNGL024, Cwm Lasgarn
- TRFNGL025, Lasgarn Wood
- TRFNGL026, Trevethin
- TRFNGL027, Mynydd Garn Wen
- TRFNGL028, Pen y Garn
- TRFNGL029, Pontypool Park
- TRFNGL030, Llanfihangel Pontymoel
- TRFNGL031, Berthin Brook

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Geology Aspect Areas

Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
9		**-**

rpsgroup.com

0 265 530 m

© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 9_LANDMAP Geology Aspect Areas.mxd

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Study Area (3km Radius)
- Candidate Site
- MNMTHLH013, Cilfeigan Park
- MNMTHLH020, Mynydd Garnclochdy
- MNMTHLH063, Penperlleni - Llanover
- MNMTHLH064, Farmland to E. of Llanover
- MNMTHLH067, Farmland to W. of Llanover
- MNMTHLH068, Craig yr Allt
- MNMTHLH070, W. rural Monmouthshire
- MNMTHLH121, River Usk"s floodplain
- MNMTHLH124, Area surrounding Litte
- MNMTHLH128, Farmland W. of Raglan
- MNMTHLH135, Cilfeigan Park Works
- MNMTHLH140, River Usk
- TRFNLH005,
- TRFNLH008,
- TRFNLH011,
- TRFNLH012,
- TRFNLH019,
- TRFNLH023,
- TRFNLH026,
- TRFNLH040,
- TRFNLH048,

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Geology Aspect Areas

Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
10		-

rpsgroup.com

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 10_LANDMAP Landscape Habitat Aspect Areas .mxd

0 265 530 m

© Crown copyright. All rights reserved. 2021 License number 0100031673|1000,1998|100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.



© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

N

Legend

- Study Area (3km
- Candidate Site

LANDMAP: Historic Landscape Aspect Areas

UID, AreaName

- MNMTHHL044, Coed-y-Prior
- MNMTHHL049, East Bergavenny
- MNMTHHL054, Cilfeigan
- MNMTHHL055, Goetre
- MNMTHHL056, Mynydd Garnclochdy
- MNMTHHL059, Estavarney and Kemeys Commander
- MNMTHHL060, Glascoed Royal Ordnance Factory
- MNMTHHL061, Usk Valley
- MNMTHHL078, Llanover
- MNMTHHL081, Gwehelog and Trostrey
- TRFNHL011, HL011 Pontypool Park
- TRFNHL012, HL012 Pontypool
- TRFNHL013, HL013 Cilgoegan and Lasgarn
- TRFNHL014, HL014 Mynydd Garnclochdy
- TRFNHL022, HL022 Mynydd y Garn-fawr

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Historic Landscape Aspect Areas

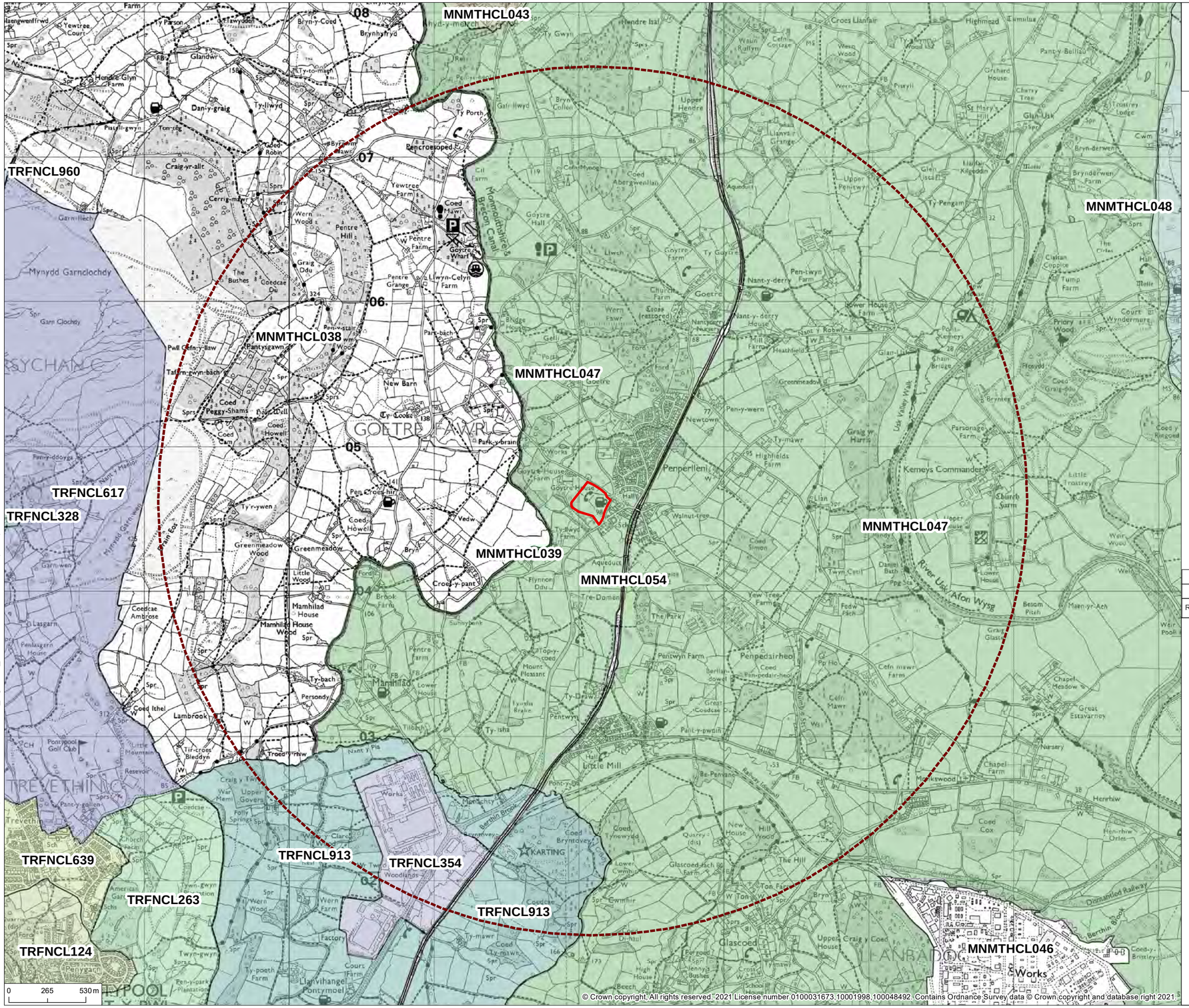
Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021

Figure Number **11** Rev **-**

rpsgroup.com

© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 11_LANDMAP Historic Landscape Aspect Areas.mxd



© Crown copyright. All rights reserved. 2021 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2021.

© 2021 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

N

Legend

- Study Area (3km
- Candidate Site
- MNMTHCL039, Monmouthshire & Brecon Canal
- MNMTHCL043, Llanover Park & Village
- MNMTHCL047, Lower Usk River Valley
- MNMTHCL048, Cobblers Plain
- TRFNCL124, Pontypool
- TRFNCL263, Pontypool Park
- TRFNCL328, Cwmafon
- TRFNCL354, Industrial Estates and Business Parks
- TRFNCL617, Uplands
- TRFNCL639, Trevethin
- TRFNCL913, Lowlands and Southern Ridges
- TRFNCL960, Blaenafon World Heritage Landscape

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

Lakesbury House, Hiltingbury Road, Chandlers Ford,Hampshire SO53 5SS
T:02380 810 440 E: rpsso@rpsgroup.com

Client	Baratt and David Wilson Homes (South Wales)
Project	Land to the West of Usk Road, Penperlleni, Monmouthshire.
Title	LANDMAP Cultural Landscape Aspect Areas

Status	Drawn By	PM/Checked By
DRAFT	JMB	GL
Project Number	**Scale @ A3**	**Date Created**
JSL3528	1:25,000	JUL 2021
Figure Number		**Rev**
12		-

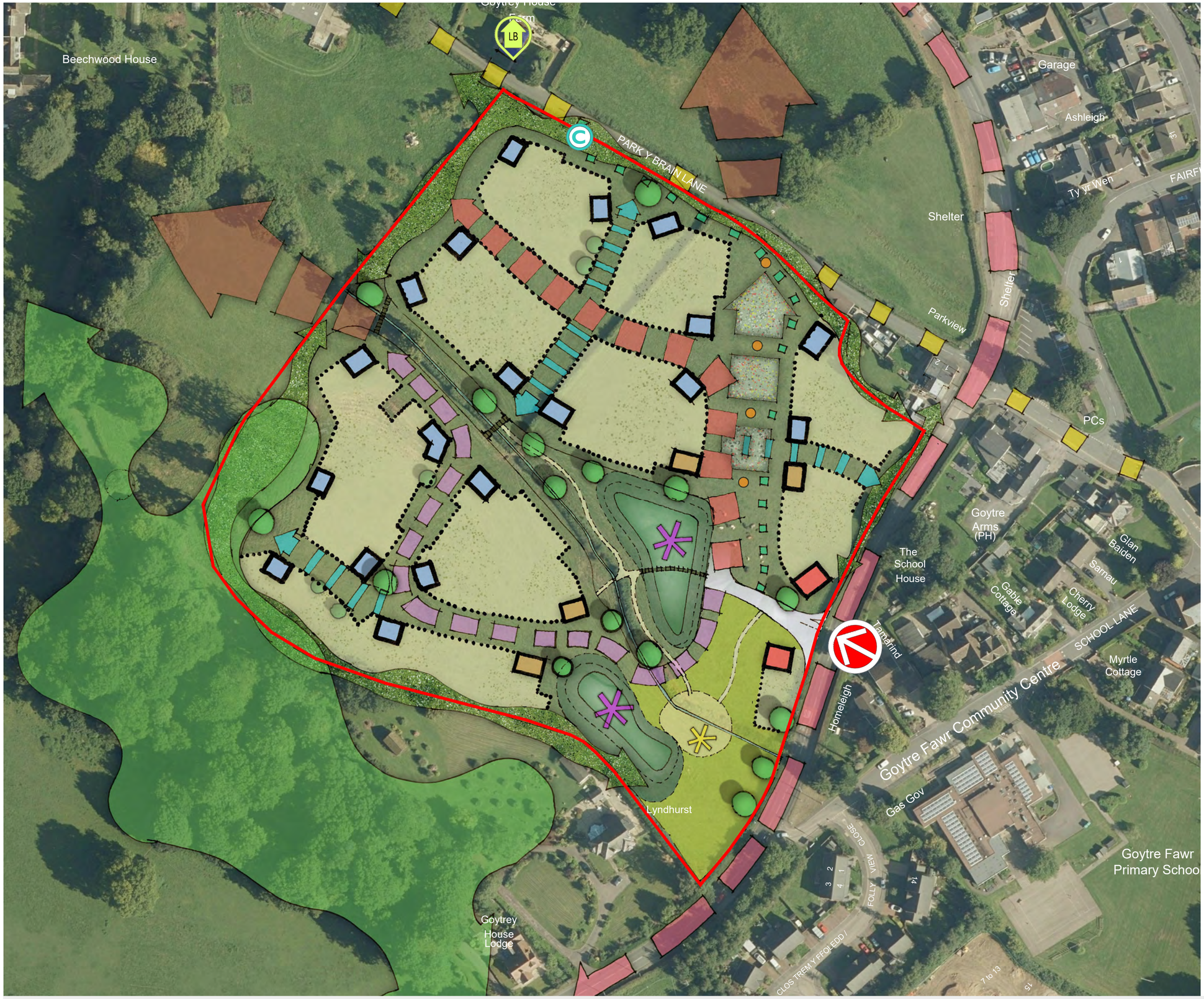
rpsgroup.com

P:\3500 Series\JSL3528 - Land west of Usk Road Penperlleni\Tech\GIS\JSL3528_Figure 12_LANDMAP Cultural Landscape Aspect Areas.mxd

APPENDICES

Appendix A

Opportunities and Concept Plan (ref. 0711-1001-V2, Focus on Design, August 2021)



N

BARRATT HOMES

REVISION/S:

LEGEND

- SITE BOUNDARY
- OPTIMUM ACCESS POINT
- A4042 (USK ROAD) - PRIMARY ROUTE THROUGH VILLAGE
- PARK Y BRAIN LANE - SECONDARY LINK INTO VILLAGE
- CONNECTION BY FOOT/CYCLE TO ACCESS 358/68/1 TO THE NORTH
- CYCLE & FOOTPATH ROUTE
- RESTORED ANCIENT WOODLAND
- VIEWS OUT TO HILLS
- GREEN CORRIDOR
- PRINCIPAL VILLAGE STREET
- SECONDARY VILLAGE STREET
- TERTIARY VILLAGE STREET
- PLAY ON THE WAY OPPORTUNITIES WITHIN GREEN CORRIDOR
- PLAY FEATURE OPPORTUNITY
- OPEN SUDS FEATURE
- POTENTIAL DEVELOPMENT
- POTENTIAL GATEWAY FEATURES/BUILDINGS
- POINT OF ARRIVAL FRAMED WITH FEATURE BUILDINGS
- WAY FINDER BUILDINGS
- LANDSCAPE BUFFERS/ENHANCEMENT OF CURRENT BOUNDARIES
- FEATURE TREES AT KEY LOCATIONS WITHIN DEVELOPMENT
- LANDSCAPE GATEWAY TO DEVELOPMENT
- EXISTING WATER COURSE
- LISTED BUILDING

LAND AT PENPERLLENI, MONMOUTHSHIRE

OPPORTUNITIES AND CONCEPT PLAN

DATE : AUGUST 2021
DRAWN : SO

DRAWING TITLE : OPPORTUNITIES AND CONCEPT PLAN
DRAWING NO : 0711-1001-V2

SCALE : 1:1000 @ A2
0 5 10 15 20 25 [m]

The Distillery, The Old Brewery Office Park,
7 - 11 Lodway, Pill, Bristol BS20 0DH
T. 01275 813380 E:admin@focusdp.com
www.focusdp.com

FOCUS ON DESIGN

This drawing is the copyright of Focus On Design which is a trading name for Focus Design Partnership Ltd. No liability will be accepted for amendments by others to either the printed or digital format.

Appendix B

Representative Viewpoints (Contextual Panoramas)

Applicaion Site occupies entire view.

Goytrey House Farm

Goytrey Farm House

Maes Y Beryn

1 and 2 Park Y Brain Lane

Representative Viewpoint 1: A4042 Usk Road

Applicaion Site occupies entire view.

1 and 2 Park Y Brain Lane / Goytre Arms

Residential properties School Lane

'Lyndhust'

Representative Viewpoint 2: Park Y Brain Lane

JSL3528_Appendix B_Representative Viewpoints_Contextual Panoramas

MAKING COMPLEX EASY

Date of photographs: 26/02/2020

Lens type: 50mm

JSL3528 Land West of Usk Road, Penperlleni
Represntative Viewpoints - Contextual Panoramas



Representative Viewpoint 3: Public Right of Way (footpath) 358/67/1



Representative Viewpoint 4: A4042 Usk Road

JSL3528_Appendix B_Representative Viewpoints_Contextual Panoramas

MAKING COMPLEX EASY

Date of photographs: 26/02/2020
Lens type: 50mm

JSL3528 Land West of Usk Road, Penperlleni
Represntative Viewpoints - Contextual Panoramas



Representative Viewpoint 5: Star Road / Public Right of Way 358/93/2



Representative Viewpoint 6: A4042 Usk Road

JSL3528_Appendix B_Representative Viewpoints_Contextual Panoramas

MAKING COMPLEX EASY

Date of photographs: 26/02/2020
Lens type: 50mm

JSL3528 Land West of Usk Road, Penperlleni
Represntative Viewpoints - Contextual Panoramas



Representative Viewpoint 7: PRoW 358/143/1 (Brecon Beacons National Park)

Date of photographs: 26/02/2020
Lens type: 50mm

JSL3528 Land West of Usk Road, Penperlleni
Represntative Viewpoints - Contextual Panoramas

JSL3528_Appendix B_Representative Viewpoints_Contextual Panoramas

Appendix C

LANDMAP Evaluation of Aspect Areas (within local Landscape Character Area PE02)

LANDMAP Evaluation of Aspect Areas

In order to supplement the Landscape and Visual Statement and to inform any future assessment, the NRW LANDMAP level 3 data for each aspect layer within Local Landscape Character Area (LLCA) PE02: Penperlleni was reviewed in accordance the 'LANDMAP Information Guidance Notes'. This included a review and summary of each aspect area within which LLCA PE02 is located, including the following:

Visual and Sensory	Scenic Quality
	Integrity
	Character Evaluation
	Rarity
	Overall Evaluation
Geological Landscape	Value
	Rarity / Uniqueness
	Overall Evaluation
Landscape Habitats	Condition
	Value
	Connectivity/Cohesion
	Overall Evaluation
Cultural Landscape	Condition
	Group Value
	Rarity
	Overall Evaluation
Historic Landscape	Condition
	Value
	Overall Evaluation

The results of the mapping exercise are presented in table format in this appendix. All evaluations are as derived directly from the LANDMAP database, accessed February 2020.

Table A1.1: Visual and Sensory Evaluation Summary Table

Local Landscape Character Area	Visual and Sensory Aspect Areas	Scenic Quality	Integrity	Character	Rarity	Overall Evaluation
LLCA PE02: Penperlleni	Goytre Lowland (MNMTHVS042)	High	High	Moderate	Moderate	High (An attractive rolling lowland landscape extensively viewed from the Blorenge and the scarp slopes of Mynydd Garnclochdy and with views of these as a backcloth. The area is in good condition with consistent character throughout and generally unspoilt by visually intrusive development. The area is character is defined primarily by the Llanover estate buildings and the ever-present scarp slope to the west. The estate character is relatively rare in Monmouthshire.)

Table A1.2: Geological Evaluation Summary Table

Local Landscape Character Area	Geological Aspect Areas	Value	Rarity/ Uniqueness	Overall Evaluation
LLCA PE02: Penperlleni	Llanover (MNMTHGL045)	High	High	High (Although mainly glacial drift at surface area includes part of the famous Usk Silurian Inlier and a significant number of Geodiversity Audit sites (see "Assessment: Field 36) including potential geological SINCs.)

Table A1.3: Landscape Habitats Evaluation Summary Table

Local Landscape Character Area	Landscape Habitats Aspect Areas	Condition	Value	Connectivity/ Cohesion	Overall Evaluation (Habitat and Species)
LLCA PE02: Penperlleni	Farmland o the West of Llanover (MNMTHLH067)	Unassessed	Moderate	Unassessed	Moderate (Evaluated as moderate for both factors.)

Table A1.4: Cultural Evaluation Summary Table

Local Landscape Character Area	Cultural Aspect Areas	Condition	Value	Rarity	Overall Evaluation
LLCA PE02: Penperlleni	Lower Usk River Valley (MNMTHCL047)	Good	High	Commonplace (Low despite being a surviving multi-period evolved landscape of exceptional attractiveness)	High (High as a surviving multi-period evolved landscape of exceptional attractiveness)

Table A1.5: Historic Evaluation Summary Table

Local Landscape Character Area	Historic Aspect Areas	Condition	Value	Overall Evaluation
LLCA PE02: Penperlleni	Goetre (MNMTHHL055)	Good	High	High (As an important transport corridor and agricultural estate landscape with a wealth of surviving post-medieval and earlier features.)

REFERENCES

Council of Europe, European Landscape Convention (ratified 2006);

Landscape Institute and Institute of Environmental Impact Assessment and Management, Guidelines for Landscape and Visual Impact Assessment: Third Edition (2013);

Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019);

Natural England, An Approach to Landscape Character Assessment (2014);

Natural Resources Wales (2016). LANDMAP the Welsh landscape baseline;

Natural Resources Wales (2017). National Landscape Character Areas;

The Monmouthshire Landscape Sensitivity Update Study (October 2020);

The Monmouthshire County Council Local Development Plan 2011 - 2021 (adopted on the 27th February 2014);

Planning Policy Wales (Edition 11, 2021);

Technical Advice Note (TAN): Nature Conservation and Planning (2009).

Tree Survey

At

Land at Penperlleni
Monmouthshire

Inspected by:-
Julian Wilkes BSc.For, MSc.Land Man, MIC.For, TechArborA
Treescene Ltd
The Walled Garden
Old Coedarhydyglyn
St Nicholas
Cardiff
CF5 6SG
Tel No. [redacted]

1st April, 2021

Brief

I have been instructed by Ms Zoe Aubrey of Barratt Homes to carry out a survey on trees at Land at Penperlleni, Monmouthshire.

Scope of Report

This Tree Survey has been undertaken within the recommendations of British Standards 5837:2012 and current good arboricultural practice.

The survey entailed a visual inspection from ground level of all trees.

Each tree has been numbered and, where instructed, have been tagged using small durable metal or plastic tags.

Due to variations of existing ground levels through the site, height dimensions are estimated and are given in metres.

Trunk/stem diameters are measured at 1.5 metres above ground level, or immediately above the root flare for multi-stemmed trees.

Estimated branch spread is taken in metres from the centre of the trunk, at the four cardinal points of a compass, to achieve an accurate representation of crown shape.

An assessment of a tree's age classification is made in terms of its maturity within the site's landscape.

An assessment of a tree's physiological condition is made as good, fair, poor, dead.

Data on the structural condition of the tree has been entered, e.g., collapsing, leaning and the presence of any decay or physical defect has been noted.

Preliminary management recommendations include further investigation of suspected defects that require more detailed assessment or potential for wildlife habitat.

An assessment of a tree's future life expectancy is made as <10, 10-20, 20-40 or >40 etc.

Table 1 – Cascade chart for tree quality assessment

Category and definition	Criteria (including subcategories where appropriate)		
Category U Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years	• Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other U category trees (i.e. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) • Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline • Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve; see 4.5.7		
	1 Mainly Arboricultural values	2 Mainly landscape values	3 Mainly cultural values, including conservation
Category A Those of high quality with an estimated remaining life expectancy of at least 40 years	Trees that are particularly good examples of their species, especially if rare or unusual, or essential components of groups, or of formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance as Arboricultural and/or landscape features	Trees, groups or woodlands of significant conservation; historical, commemorative or other value (e.g. veteran trees or wood-pasture)
Category B Those of moderate quality with an estimated remaining life expectancy of at least 20 years	Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural benefits
Category C Those of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value, and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G1	Group of Hazel (Corylus avellana), Hawthorn (Crataegus monogyna) and Holly (Ilex aquifolium)	1	Multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	B
G2	Group of Hazel (Corylus avellana), Hawthorn (Crataegus monogyna), Holly (Ilex aquifolium), Elder (Sambucus nigra) and Ash (Fraxinus excelsior)	1	Multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	B
G3	Group of Hazel (Corylus avellana), Hawthorn (Crataegus monogyna), Holly (Ilex aquifolium) and Blackthorn (Prunus spinosa)	1	Multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	B

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G4	Group of Hazel (Corylus avellana), Hawthorn (Crataegus monogyna), Holly (Ilex aquifolium) and Blackthorn (Prunus spinosa)	1	Multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	B
G5	Group of Hazel (Corylus avellana), Hawthorn (Crataegus monogyna), Holly (Ilex aquifolium), Elder (Sambucus nigra), Ash (Fraxinus excelsior) and Oak (Quercus robur)	1	Multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	B

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G6	Group of 1 Apple (Malus spp), 1 Pear (Pyrus spp) and 1 Holly (Ilex aquifolium)	Up to 11	Single and multi	0.3 (avg)	3	3	3	2	1	Mature	Fair to poor	Off-site trees located in orchard area. Pear has suffered significant structural failure.	Monitor for safety	10-20	C
T7	Oak (Quercus robur)	17	Single	0.84	6	6	7	7	2	Mature	Fair	Notable hedgerow tree of reasonable form. Main stem and mid crown heavily colonised by ivy thus preventing full inspection. Some evidence of die-back in mid and upper crown. Leading stem in upper crown is dead.	Prune to remove unstable deadwood of diameter >50mm. Monitor for safety.	20-40	B
G8	Group of Holly (Ilex aquifolium) and Hazel (Corylus avellana)	8	Multi	0.25	1	2	2	1	0	Middle aged	Fair	Scrubby specimens that are effectively an overgrown hedgerow	No action required at this time	20-40	C
G9	Group of Holly (Ilex aquifolium), Hawthorn (Crataegus monogyna), Beech (Fagus sylvatica) and Elder (Sambucus nigra)	1	Single and multi	0.15	0.5	0.5	0.5	0.5	0	Middle aged	Fair	Scrubby specimens forming gappy hedgerow that has been tightly flailed	No action required at this time	20-40	C

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T10	Oak (Quercus robur	15	Single	0.79	6	6	8	8	3	Mature	Fair	Notable hedgerow tree of reasonable form. Main stem and mid crown heavily colonised by ivy thus preventing full inspection. Some minor die-back in upper crown.	Prune to remove unstable deadwood of diameter >50mm. Monitor for safety.	>40	B
G11	Group of Hawthorn (Crataegus monogyna) and Hazel (Corylus avellana)	1	Single and multi	0.1	0.5	0.5	0.5	0.5	0	Middle aged	Fair to poor	Scrubby specimens forming gappy hedgerow dominated by bramble	No action required at this time	10-20	C
T12	Oak (Quercus robur)	17	Single	0.26	2	4	6	6	5	Middle aged	Fair	Hedgerow tree of variable form with crown more heavily developed on southern side	No action required at this time	>40	B
G13	Group of Birch (Betula pendula), Beech (Fagus sylvatica), Hazel (Corylus avellana) and Holly (Ilex aquifolium)	16	Single and multi	0.25	3	3	3	3	0	Middle aged	Fair	Overgrown hedgerow specimens	No action required at this time	20-40	B

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T14	Oak (Quercus robur)	20	Single	1.2	14	12	10	11	4	Mature	Good	Notable hedgerow tree of good form	No action required at this time	>40	A
G15	Group of Beech (Fagus sylvatica), Birch (Betula pendula), Holly (Ilex aquifolium) and Hazel (Corylus avellana)	Up to 18	Single and multi	0.35	5	5	5	5	0	Middle aged	Fair	Overgrown hedgerow	No action required at this time	20-40	B
T16	Apple (Malus spp)	8	Single	0.41	1	7	5	1	3	Mature	Poor	This specimen has a significant split in main stem extending from ground level to 3m	Remove	<10	U
T17	Ash (Fraxinus excelsior)	23	Single	0.8 (est)	12	11	13	14	4	Mature	Poor	Notable off-site tree infected with Ash Die-back disease	Remove	<10	U
G18	Group of Holly (Ilex aquifolium), Cherry Laurel (Prunus lauro-cerasus) and Rhododendron	7	Multi	0.25	2	2	2	2	0	Middle aged	Fair	Evergreen boundary screen	No action required at this time	20-40	C
T19	Wellingtonia (Sequoia-dendron giganteum)	28	Single	>1.5	8	8	8	8	3	Mature	Good	Notable off-site tree of good form	No action required at this time	>40	A

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T20	Hazel (Corylus avellana)	10	Multi	0.4	2	7	7	3	1	Mature	Fair	Multi stemmed specimen of variable form with some internal decay within stems	Monitor for stability	10-20	C
T21	Wellingtonia (Sequoia-dendron giganteum)	27	Single	>1.5	9	9	9	9	4	Mature	Good	Notable off-site specimen of good form	No action required at this time	>40	A
G22	Group of Western Hemlock (Tsuga heterophyllia) and Western Red Cedar (Thuja plicata)	25	Single	0.6 (avg)	9	9	9	9	2	Mature	Good	Notable off-site trees of good form	No action required at this time	>40	A
T23	Birch (Betula pendula)	25	Single	0.55	6	7	8	9	6	Mature	Fair	Notable off-site tree of reasonable form. Main stem colonised by ivy thus preventing full inspection.	Monitor for health	20-40	B
G24	Group of 2 Oak (Quercus robur) and 1 Yew (Taxus baccata)	24	Multi	0.8	10	10	10	10	3	Mature	Fair	Off-site trees of reasonable form. Western-most Oak tree has recently been pruned presumably in relation to some internal decay within major limbs.	Monitor for health	>40	B

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G25	Group of 2 Birch (Betula pendula)	24	Single	0.26	0	2	8	6	5	Middle aged	Poor	Trees of variable form with low stem diameter to height ratios. Both specimens lean excessively to the south and west and are at risk of future failure.	Remove	>10	U
T26	Oak (Quercus robur)	16	Single	0.29	3	4	5	5	2	Middle aged	Fair	Boundary tree of reasonable form	No action required at this time	>40	B
T27	Holly (Ilex aquifolium)	7	Multi	0.25	2	2	2	2	1	Middle aged	Fair	Boundary tree of reasonable form	No action required at this time	10-20	C
T28	Horse Chestnut (Aesculus hippo-castanum)	23	Single	0.99	10	11	5	12	3	Mature	Fair to poor	Notable tree of reasonable form. Evidence of thinning of foliage within crown. Stunted shoot growth indicates that this is a tree of declining vigour.	Monitor for health	10-20	C
T29	Horse Chestnut (Aesculus hippo-castanum)	24	Single	0.85	8	8	9	8	2	Mature	Poor	Notable tree that has suffered massive internal decay extending from ground level to approximately 10m. This specimen is unsafe for retention.	Remove	<10	U

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T30	Horse Chestnut (Aesculus hippo-castanum)	5	Single	0.68	1	1	1	1	2	Mature	Poor	Crown and main stem of this tree have snapped. Decay extends to ground level.	Remove	<10	U
T31	Horse Chestnut (Aesculus hippo-castanum)	25	Single	1.02	4	9	9	9	3	Mature	Poor	Tree of variable form exhibiting internal decay at ground level and significant decay within main stem and major limbs. This specimen is unsafe for long-term retention.	Remove	<10	U
T32	Scots Pine (Pinus sylvestris)	18	Single	0.33	2	2	2	2	12	Middle aged	Fair	Suppressed specimen with low stem diameter to height ratio	Monitor for stability	10-20	C
T33	Larch (Larix decidua)	20	Single	0.99	3	6	4	1	9	Mature	Poor	This specimen is partially failed to the east. Root plate has lifted. This specimen is vulnerable to failure.	Remove	<10	U
G34	Group of 2 Scots Pine (Pinus sylvestris)	20	Single	0.48	5	3	6	7	6	Mature	Good	Notable specimens of reasonable form	No action required at this time	>40	B
T35	Ash (Fraxinus excelsior)	20	Single	0.44	7	5	5	9	5	Mature	Poor	Boundary tree infected with Ash Die-back disease	Remove	<10	U

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T36	Oak (Quercus robur)	22	Single	>1.25	5	3	10	11	5	Mature	Fair to poor	Notable tree of variable form with crown developed on south-western side only. Massive basal decay on southern side of main stem which extends internally rendering the upper crown potentially unstable. Extensive deadwood throughout crown which is normal for a tree of this age. Some evidence of thinning of foliage throughout crown. Dense epicormic shoots throughout crown indicates a tree of declining vigour.	Shorten all apical and lateral branches by 5-6m, pruning back to suitable growing points. Prune to remove unstable deadwood of diameter >50mm. Monitor for safety.	10-20	C
T37	Ash (Fraxinus excelsior)	4	Single	0.9	0	0	0	0	0	Mature	Poor	This specimen has recently failed leaving high stump	Remove	<10	U
T38	Horse Chestnut (Aesculus hippo-castanum)	19	Single	>1.25	10	10	6	9	3	Mature	Poor	Notable specimen with extensive die-back throughout crown. This specimen is in a moribund condition and unsafe for retention.	Remove	<10	U

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T39	DEAD														
G40	Group of Hornbeam (Carpinus betula)	19	Single and multi	0.4	6	9	3	4	3	Mature	Fair	Boundary trees of reasonable form. Some stems leaning to the east.	Monitor for stability	20-40	B
T41	Beech (Fagus sylvatica)	16	Single	0.75	8	8	1	4	8	Mature	Poor	Upper crown has failed as a result of Ganoderma infection	Remove	<10	U
T42	Beech (Fagus sylvatica)	24	Single	0.55 (est)	2	3	9	9	4	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Tree of variable form leaning to the south-west.	Monitor for stability	10-20	C
G43	Group of Holly (Ilex aquifolium)	8	Single and multi	0.15	1	1	1	1	0	Young	Fair	Scrubby specimens of variable form	No action required at this time	20-40	C
T44	Oak (Quercus robur)	19	Single	0.6 (est)	4	10	3	8	5	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Some deadwood within crown.	Prune to remove unstable deadwood of diameter >50mm. Monitor for safety.	20-40	B
T45	Beech (Fagus sylvatica)	22	Single	0.75 (est)	9	9	9	9	9	Mature	Poor	Off-site tree thus preventing full inspection and accurate measurement. Tree of reasonable form with massive internal decay on main stem at approximately 8m which renders upper crown unstable.	Remove	<10	U

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T46	Holly (Ilex aquifolium)	9	Multi	0.2	2	2	2	2	0	Middle aged	Fair	Scrubby specimen of variable form	No action required at this time	20-40	C
T47	Beech (Fagus sylvatica)	22	Single	0.6 (est)	8	8	8	8	10	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Tree of reasonable form.	No action required at this time	>40	B
T48	Oak (Quercus robur)	10	Single	0.4 (est)	1	4	1	1	3	Mature	Fair to poor	Off-site tree thus preventing full inspection and accurate measurement. This specimen has been severely reduced.	No action required at this time	10-20	C
T49	Sycamore (Acer pseudo-platanus)	22	Single	0.75 (est)	6	8	7	8	4	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Some storm damage in lower and mid crown possibly associated with previous squirrel damage.	Prune to remove severely squirrel and storm damaged branches. Monitor for safety.	20-40	B
T50	Oak (Quercus robur)	24	Single	>1.25	13	14	14	14	4	Mature	Good	Notable specimen of good form with well-balanced crown	Prune to remove unstable deadwood of diameter >50mm	>40	A
T51	Oak (Quercus robur)	23	Single	1.1 (est)	9	10	10	10	4	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Tree of reasonable form with some evidence of thinning of foliage within crown. Significant accumulation of deadwood.	Prune to remove unstable deadwood of diameter >50mm. Monitor for health.	>40	B

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T52	Oak (Quercus robur)	20	Single	0.75 (est)	5	9	9	7	4	Mature	Good	Off-site tree thus preventing full inspection and accurate measurement. Tree of reasonable form.	No action required at this time	>40	A
T53	Weeping Willow (Salix crysocoma)	10	Single	0.35 (est)	7	7	7	7	2	Middle aged	Good	Off-site tree thus preventing full inspection and accurate measurement. Ornamental specimen of good form.	No action required at this time	>40	B
G54	Group of Hawthorn (Crataegus monogyna), Ash (Fraxinus excelsior) and Elder (Sambucus nigra)	1	Single and multi	0.1	0.5	0.5	0.5	0.5	0	Middle aged	Fair	Scrubby specimens forming gappy hedgerow	No action required at this time	20-40	C
G55	Group of Privet (Ligustrum)	1.5	Single and multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Ornamental boundary hedgerow	No action required at this time	20-40	C

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G56	Group of Privet (Ligustrum), Hawthorn (Crataegus monogyna), Beech (Fagus sylvatica) and Holly (Ilex aquifolium)	1.5	Single and multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Boundary hedgerow dominated by privet	No action required at this time	20-40	B
T57	Lawson Cypress (Chamae-cyparis lawsoniana)	8	Single	0.7	3	4	2	4	1	Mature	Fair to poor	Roadside tree that has been heavily reduced in the past. Some mechanical damage on southern side of lower crown associated with conflict with high-sided vehicles.	Monitor for safety	10-20	C
T58	Lawson Cypress (Chamae-cyparis lawsoniana)	10	Single	0.25	2	1	2	2	2	Middle aged	Fair	Tree of variable form located immediately adjacent to main stem of Sycamore	Monitor development of main stem in relation to adjacent tree	10-20	C
T59	Sycamore (Acer pseudo-platanus)	13	Single	0.35 (est)	2	2	8	2	3	Middle aged	Fair to poor	Tree of variable form that has suffered squirrel damage in lower and mid crown which could lead to branch failure in relation to adjacent highway.	Shorten all lateral branches extending over highway by 3-4m to minimise risk of branch failure. Monitor for safety.	10-20	C

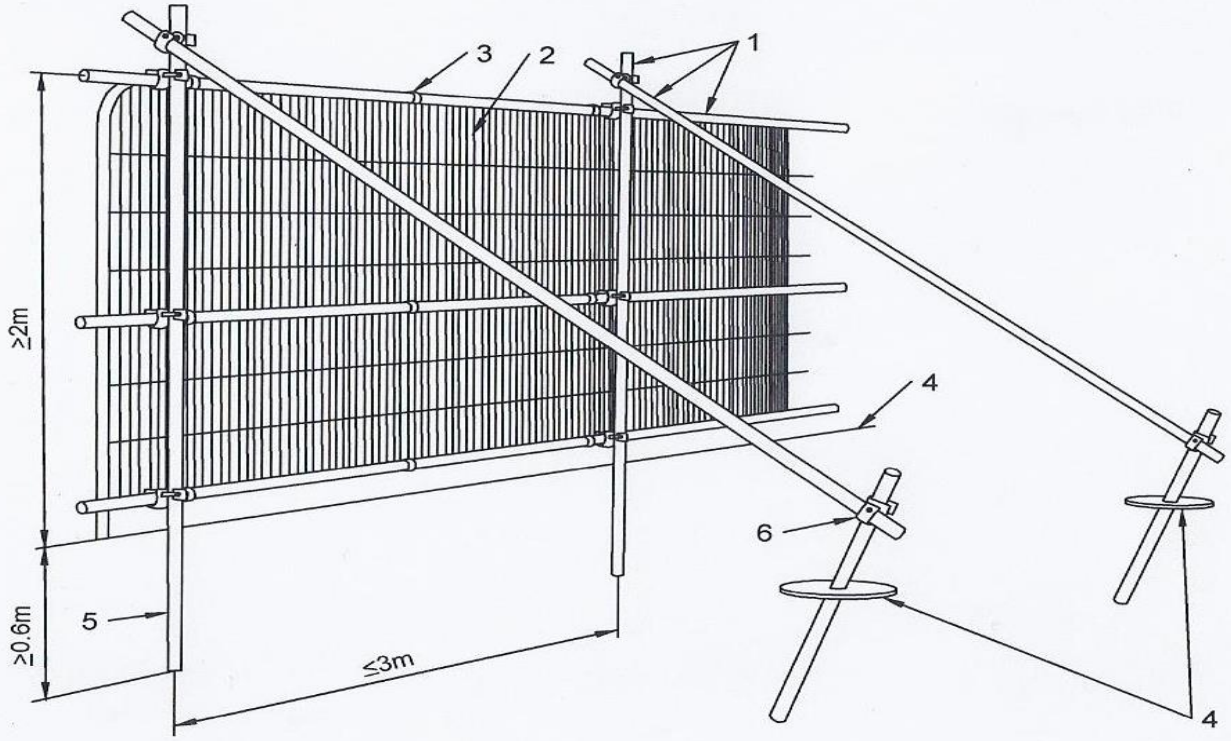
Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
T60	Lawson Cypress (Chamae-cyparis lawsoniana)	14	Multi	0.5	2	4	4	2	2	Middle aged	Fair to poor	Twin stemmed specimen of variable form that has been heavily pruned in lower crown in relation to adjacent highway	Monitor for safety	10-20	C
T61	Birch (Betula pendula)	17	Single	0.4 (est)	5	7	4	5	4	Mature	Fair	Off-site tree thus preventing full inspection and accurate measurement. Main stem and mid crown heavily colonised by ivy thus preventing full inspection. Tree of reasonable form and vigour.	No action required at this time	20-40	B
G62	Group of Hawthorn (Crataegus monogyna), Holly (Ilex aquifolium), Sycamore (Acer pseudo-platanus), Ash (Fraxinus excelsior) and Hazel (Corylus avellana)	1	Single and multi	0.15	25 cm	25 cm	25 cm	25 cm	0	Middle aged	Fair	Scrubby specimens forming dense boundary hedgerow that has been tightly flailed	No action required at this time	20-40	C

Tree No.	Species	Height(m)	Single/Multi Stemmed	Stem Diameter(m)	Branch Spread(m)				Height of Crown(m)	Age	Physiological Condition	Structural Condition	Prel. Man. Recommendations	Est. Remaining Contribution	Category
					N	E	S	W							
G63	Group of Beech (Fagus sylvatica)	2	Single and multi	0.1	25 cm	25 cm	25 cm	25 cm	0	Young	Good	Residential boundary hedgerow	No action required at this time	20-40	C

Recommendations for Tree Protection during Development

Due to the high risk to established trees we would recommend the installation of protective fencing prior to commencement of **any** works on site in accordance with BS 5837:2012 "Trees in relation to Construction". Trees should be protected using scaffold frame supporting weld mesh panel fencing sited on the edge of the Root Protection Area as defined in BS5837:2012. These fenced areas should not be used for the storage of any plant machinery or materials and personnel should be excluded at all times; these fences should remain in situ until after final landscaping has been carried out, removed by hand with great care to prevent compaction or root damage to established trees. The services of a suitably qualified arborist should be sought **prior** to the commencement of each stage.

Figure 2 Default specification for protective barrier



Key
1 Standard scaffold poles
2 Heavy gauge 2m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6m)
6 Standard scaffold clamps

1533

Manor Farm Partnership

Professional Representations for Candidate Site CS0168: Land West of Rogiet, Monmouthshire

Date: 19th November 2024
On behalf of: Manor Farm Partnership
Prepared by: Powells



Introduction

These representations are submitted to Monmouthshire County Council in support of the reconsideration of **Candidate Site CS0168: Land at Rogiet** for allocation in the Replacement Local Development Plan (RLDP). Despite the site's current exclusion from the RLDP due to concerns related to flood risk, Green Wedge designation, and perceived deliverability challenges, we present a robust case for its allocation.

This representation addresses:

1. The site's deliverability, including flood risk management and its alignment with key planning policies.
2. The appropriateness of the Green Wedge designation and the case for its removal.
3. The strategic suitability, viability, and benefits of the site, demonstrating its alignment with Monmouthshire's housing and growth objectives.

Flood Risk and TAN15 Designation

Uncertainty in Projections for Sea Level Rise Underpinning the TAN15 Designation

The updated TAN15 flood risk designation for Candidate Site CS0168 is predicated on projections of sea level rise due to climate change, which are based on long-term climate models extending over an 80-year horizon. While such projections are valuable for broad policy planning, they inherently carry significant uncertainties that must be critically evaluated when applied to site-specific designations.

1. **Scientific Uncertainty in Climate Models:**
    - Climate models predicting sea level rise rely on assumptions about global carbon emissions, polar ice melt, and ocean thermal expansion. Variability in these inputs leads to a wide range of potential outcomes, with differing projections of both the magnitude and timing of sea level rise.
    - The Intergovernmental Panel on Climate Change (IPCC) highlights the inherent uncertainties in predicting regional sea level changes, particularly for low-lying coastal regions like the Severn Estuary. These uncertainties are compounded by factors such as sedimentation, tidal movements, and localised land subsidence or uplift.
2. **Localised Discrepancies in Flood Mapping:**
    - The TAN15 designation relies on NRW flood maps that may not account for localised topographic or hydrological conditions. This can lead to an overgeneralisation of flood risk at specific sites like CS0168.
    - Historical data for the Rogiet area does not indicate significant flooding events that would substantiate the projected future risk. Prior to the TAN15 update, the site was not identified as at risk, suggesting that the current designation may

reflect a precautionary approach rather than an evidence-based assessment of local conditions.

3. **Debate Over the Pace and Extent of Sea Level Rise:**
    - While there is consensus that sea levels are rising, the rate and extent of this rise remain contested within the scientific community. The projections used in TAN15 are based on higher-end emission scenarios and worst-case outcomes, which may not materialise if global mitigation efforts to curb emissions are successful.
    - For example, lower emissions pathways aligned with the Paris Agreement targets would significantly reduce the pace of sea level rise, potentially invalidating the long-term flood risk designation for sites like CS0168.
4. **Impact of Future Flood Defence Measures:**
    - The strategic importance of infrastructure in the Rogiet area, including the M4 motorway, rail network, and existing settlements, makes it likely that flood defence works will be prioritised to protect these assets. Such measures would reduce the flood risk to CS0168, rendering the current designation less relevant in the long term.
    - National policies and funding streams, such as the UK's Flood and Coastal Erosion Risk Management Strategy, are committed to improving flood resilience in vulnerable areas. Rogiet and its surrounding infrastructure would undoubtedly benefit from these initiatives, further reducing the potential risk to the site.
5. **Practical Implications for Development:**
    - Development at CS0168 can incorporate advanced engineering and design solutions to mitigate potential flood risks. Raised floor levels, sustainable drainage systems (SuDS), and flood-resilient construction techniques can ensure the site is safe and suitable for development, even under higher-end flood scenarios.
    - By addressing potential risks through design, the site could be developed in a manner consistent with TAN15's overarching objective to minimise harm while facilitating sustainable growth.

Section Conclusion

The reliance on long-term climate projections to designate the flood risk for Candidate Site CS0168 introduces significant uncertainty that warrants closer scrutiny. Given the variability in sea level rise predictions, the localised conditions at Rogiet, and the likelihood of future flood defence investments, the risk for this site may be overstated. Monmouthshire County Council should re-evaluate the TAN15 designation with these factors in mind, ensuring a balanced approach that reflects both current conditions and the site's potential for mitigation and adaptation.

Proposed Action

- We request that the Council revisits the site-specific flood risk assessment with NRW and considers the potential impact of future flood defence investments in the area.
- Further, we recommend that Monmouthshire advocates for site-specific refinements to the TAN15 mapping, considering both the strategic importance of the site and the deliverability of mitigation measures.

Green Wedge Designation

Justifying the Release of Land from Green Wedge

The current Green Wedge designation for Candidate Site CS0168 presumes against new development to prevent urban coalescence and preserve openness in the area. However, a detailed assessment reveals that the designation does not effectively serve these purposes and that removing the site from the Green Wedge would enable sustainable development while aligning with broader strategic policies.

---

1. Limited Role in Preventing Coalescence

1. **Inadequacy of the Green Wedge Boundary:**
    - The Green Wedge at Rogiet does not serve a meaningful purpose in preventing urban coalescence. The physical and policy constraints already in place, including the **Conservation Area designation around Llanvihangel Rogiet**, naturally limit inappropriate development in this part of the settlement.
    - The site is contained by its local context, and its development would not risk merging Rogiet with nearby settlements. The current Green Wedge designation offers no additional protection against coalescence that is not already achieved through existing statutory designations.
2. **Role of the Natural Landscape and Infrastructure:**
    - Significant infrastructure, such as the **M4 motorway** and the **rail corridor**, create robust and permanent physical boundaries that naturally separate Rogiet and the River Severn. These features are far more effective at preventing coalescence than the Green Wedge designation and render the designation redundant in this context.
    - The site is visually and physically contained by natural features, ensuring that development would not intrude upon the perceived openness of the area.

3. **Reassessing Strategic Land Use:**
    - The Green Wedge designation at Rogiet must be evaluated in terms of its strategic purpose. Given the clear presence of other, more permanent constraints, the designation's role in protecting the area from coalescence is overstated and unnecessary.

---

2. Inconsistency with Future Wales Policy

1. **Shift Toward a Regional Green Belt Strategy:**
    - The **Cardiff-Newport Green Belt designation** introduced under **Future Wales 2040** provides a more strategic and robust mechanism for managing urban coalescence and sprawl in South East Wales. Unlike the Green Wedge, the Green Belt is designed to address development pressures at a regional scale.
    - The Rogiet Green Wedge is a smaller-scale, outdated mechanism that does not align with this broader policy framework. The Green Belt's establishment renders the Green Wedge designation redundant, as the larger regional strategy now governs coalescence and urban growth management.
2. **Alignment with Regional Growth Objectives:**
    - The **Future Wales 2040** policy framework prioritises the delivery of housing and infrastructure in sustainable locations that support economic growth. Releasing Candidate Site CS0168 from the Green Wedge designation aligns with this objective, as the site offers an accessible and sustainable development opportunity that supports regional housing and employment targets.

---

3. Opportunity for Sustainable Development

1. **Supporting Housing and Employment Needs:**
    - Monmouthshire faces significant pressure to deliver housing that meets local needs, particularly affordable and family homes. Releasing the land from the Green Wedge would unlock a strategically located site that can contribute to meeting these targets in a sustainable and accessible location.
    - The site's proximity to the **Rogiet rail station**, **active travel networks**, and the **M4 corridor** makes it an ideal candidate for mixed-use development that reduces car dependency and supports sustainable transport.
2. **Strategic Integration into the RLDP:**
    - Allocating Candidate Site CS0168 would contribute to a balanced and sustainable growth strategy for Rogiet, ensuring that housing and employment opportunities are delivered in tandem with infrastructure improvements.

3. **Preservation of Openness Elsewhere:**
    - Releasing this site from the Green Wedge does not compromise the broader objectives of maintaining openness and preventing coalescence. Land elsewhere within Monmouthshire, particularly along more vulnerable boundaries, can retain the Green Wedge designation to meet these objectives.

Proposed Action: Removing the Site from the Green Wedge

1. **Revisiting the Green Wedge Boundary:**
    - As part of the RLDP process, the Council should reassess the Green Wedge boundary, specifically considering the site's strategic context and the presence of alternative constraints such as the Conservation Area and regional infrastructure. These factors negate the need for the Green Wedge designation at this location.
2. **Aligning with Future Wales and RLDP Objectives:**
    - Removing Candidate Site CS0168 from the Green Wedge designation would align with both **Future Wales 2040** and Monmouthshire's RLDP objectives by enabling sustainable, deliverable, and strategically located development.
3. **Reassessing Strategic Priorities:**
    - The Council should prioritise land that supports growth while maintaining environmental and social balance. Releasing this site would demonstrate a commitment to addressing housing shortages and delivering development in the right locations.

END

1588

AB INBev UK Limited

View results

Respondent

590 Anonymous

27:31
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

Gerald Eve LLP on behalf of AB InBev UK Limited

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

9. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

10. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

11. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the design and sustainable place-making policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

12. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

13. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

16. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

17. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

18. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

19. Would you like to comment on this question *

- (•) Yes
- ( ) No

20. Is your representation in support or objection? *

- (•) Support
- ( ) Objection

21. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Policy EA1(f) Quay Point - employment allocation to the south of the Magor Brewery.

AB InBev UK Limited, owner and operator of the Magor Brewery, supports the inclusion of the Quay Point allocation for industrial and manufacturing uses. The Brewery has previously expanded into the Quay Point allocation to support production capacity. Continued allocation of the Quay Point site would enable the Brewery or other supporting uses to come forward at the appropriate time to further increase the Brewery's manufacturing capacity and efficiency.

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

22. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

23. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

25. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

28. Do you consider that the Plan is sound? *

- (●) Yes
- ( ) No

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

29. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- ( ) Yes
- (●) No

Part 5: Welsh Language

30. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

31. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



1596

Monmouthshire Housing Association (MHA) (Boyer Planning)

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Monmouthshire Housing Association (MHA)	Boyer Planning
Address:	C/O Agent	[redacted]
Telephone No:		

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

This representation will relate and support Policy HA13 - Land adjacent to Piercefield Public House, St Arvans.

Monmouthshire Housing Association (MHA) agree that key issues and drivers, vision and objective identified in the Replacement LDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the plan period as set out within legislation and national policy and guidance, whilst also clearly identifying the relevant evidence base used to formulate the emerging plan and how this has evolved since the Preferred Strategy (PS).

MHA support the recognition that Monmouthshire demonstrates capacity for sustainable growth based on accessibility, availability of amenities and employment provision in the context of its existing population bases which is reflected within the Integrated Sustainability Appraisal and supporting technical evidence base. We also support the recognition of Monmouthshire as a hub for development, in particular for housing in accordance with the findings of the Local Housing Market Assessment Refresh.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

In principle MHA support the Monmouthshire County Council Replacement Local Development Plan (RLDP) and Strategic Policy S1 – Growth Strategy which makes provision for 6,210 homes to meet a housing requirement of 5,400 homes.

MHA are aware that this now includes a 15% flexibility allowance, above the 10% previously proposed. MHA consider this as positive and in line with the Development Plan Manual, to ensure the consistent delivery of dwellings at the rate set out within the housing trajectory. This would ensure the consistent delivery of homes throughout the Plan period.

That said, MHA do note that whilst Monmouthshire is not within the National Growth Area identified in Future Wales 2040, they agree that the proposed level of growth is a minimum to ensure delivery of housing

MHA do commend the aspiration of the RDLP to support rural communities, the rural economy and deliver on ambitious affordable housing targets. MHA believe this aspiration is achieved, in particular through the support of Policy H2 which allows development in Main Rural Settlement, such as St Arvan. This approach would be consistent with Policies 4, 5 and 7 of FW 2040 to ensure that rural communities in Monmouthshire are thriving and resilient, with a re-balanced demography that would protect the future of these communities over the plan period and beyond.

MHA agree with the Plan's focus on the delivery of affordable homes to specifically address housing affordability which is one of the most fundamental challenges facing communities. MHA supports the RLDP seeking to maximise affordable housing delivery on new housing allocations to reflect the Council's commitment to deliver 50% affordable homes on new housing sites to help tackle Monmouthshire's housing need, homelessness and social inequality.

To achieve this, MHA supports the allocation of Policy HA13 – Land adjacent to Piercefield Public House, St Arvans. MHA wish to work with the Council to cooperate to ensure the delivery to meet local needs.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 – Spatial Distribution of Development sets out the proposed Settlement Hierarchy for the County. The Policy seeks to focus the majority of new development on the primary settlements of Abergavenny (including Llanfoist), Monmouth, Chepstow and Caldicot including the Severnside area. However, MHA support the increase in from 8% to 9% of the housing target proposed to be delivered across the Main Rural and Minor Rural Settlements, including St Arvans.

Whilst MHA agree in principle that new development should be allocated to primary settlements, in order to achieve the aspiration of more demographically balanced rural communities, it is agreed that this can best be achieved through directing growth to the more sustainable rural settlements, such as St Arvans. This would enable greater opportunities for demographically diverse people to stay in or move to these settlements, thereby serving to protect and reinforce the long-term vitality of those communities.

MHA support the identification of St Arvans as a Main Rural Settlement capable of accommodating development to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. In particular proposed Allocation HA13 (St Arvans).

It is acknowledged that the County has an aging population, with The Sustainable Settlement Appraisal (SSA, December 2022) confirming that the County as a whole to be nearly 25% over 65. As is shown in Table 16 of the SSA, the Mid-Year Population estimates by Settlement and Age Group, St Arvans is estimated as having approximately 31% of the population over 65. This would be one of the highest disproportionately aging communities in the County. As such, we agree with the growth directed to rural settlements such as St Arvans, to fulfil the aspirations of the RDLP and FW 2040 to demographically rebalance communities to ensure their economic and social sustainability and vitality.

MHA consider that rural settlements such as St Arvans are a suitable and appropriate location for a commensurate level of growth, that could support the sustainability and vitality of the community, whilst also serving to support housing land requirements for its hinterland and nearby main settlements. St Arvans is located less than 13km to the south of Bigsweir Bridge, whilst also located just over 1.5km north of Chepstow, with good connectivity and access to

services and facilities. As such, St Arvans provides support for these settlements, as well as its own community.

Overall, MHA consider that St Arvans is well placed within the Tier 3 – Main Rural Settlements in Strategic Policy S2, and agree with the scale of growth in the Deposit Plan reflective of the aspiration to protect and enhance the sustainability, longevity and vitality of the community as well as acknowledging the supporting role that St Arvans gives to the main rural settlements of Chepstow and Monmouth. We consider that this growth is accommodated by Allocation HA13- Land adjacent to Piercefield Public House.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Whilst MHA have no specific comments in relation to the requirements of Policy OC1- New built development in the Open Countryside, there is support in regard to the Settlement Boundary Review which facilitates the above policy.

The Settlement Boundary Review Paper (October 2024) which accompanies the RLDP provides the background and justification for alterations to existing settlement boundaries within the Deposit Plan. Given St Arvans position as a Main Rural Settlement, MHA supports the amendments being sought in respect of the existing settlement boundary. Most notably that includes reference 111 which intends to amend the boundary in the southern corner of the settlement to facilitate the delivery of Residential Allocation HA13- Land adjacent to Piercefield Public House.

As the developer, MHA remain fully committed to development opportunities associated with Land adjacent to Piercefield Public House. The site represents a logical extension to the defined urban area of St Arvans and will enable residential development to come forward in a Main Rural Settlement. From a procedural perspective the site also aligns with MCC's Growth Strategy and Spatial Strategy which collectively go to the heart of the RLDP in terms of promoting a sustainable pattern of development.

- MAH have no comments on Policy GW1 – Green Wedge Designations

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

MHA broadly agree with the wording and rationale of Strategic Policy S3 (Sustainable Placemaking & High Quality Design) and Policy PM1 (Creating Well-Designed Places). Upon further review we understand the overarching principles of which are reiterated within Strategic Policy S8 (Site Allocation Placemaking Principles) along with the proposed site allocation for Land adjacent to Piercefield Public House (Policy HA13) itself, which MHA are confident in delivering, in principle, in line with MCC's expectations. MHA have some specific comments to Policy HA13 which are addressed later.

The Proposed Masterplan demonstrates that spatially the site is more than capable of accommodating the proposed allocation of 16 no. homes and is very much a Green Infrastructure-led approach providing ample provision for public open space, green infrastructure, pedestrians accessibility, and SuDS/attenuation basins. Collectively these features are illustrated within the information provided as part of MHA's latest candidate site submission which have been deemed acceptable by the authority.

- MHA have no comments on Policy PM2– Environmental Amenity
- MHA have no comments on Policy PM3 – Advertisements
- MHA have no comments on Policy HE1 – Conservation Areas
- MHA have no comments on Policy HE2 – Design of Shop Fronts in Conservation Areas
- MHA have no comments on Policy HE3 – Roman Town of Caerwent

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	Support/Comment
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S4 – Climate Change, sets out a range of measures and criteria for developments to address the cause of and adapt to the impacts of climate change. In principle, MHA is eager to help contribute towards MCC's Climate and Decarbonisation Strategy and Action Plan, which sets out broad objectives and actions to deliver a net reduction in carbon emissions to net zero by 2030 and address the water issues in the County.

The level of MHA's sustainability is demonstrated through the use of sustainable modes of transport, sustainability within the design of buildings, or indeed the actual proportions of Green & Blue Infrastructure. This is demonstrated in the indicative candidate site submissions.

In terms of specifics within Strategic Policy S4, MHA support the prioritisation of fabric first as per criteria (ii), and also notes that criteria (iv) requests developments to utilise sustainable construction techniques and local supplies through the adoption of the circular economy principles where possible.

MHA fully supports emerging policies seeking to tackle climate change with proactive sustainable measures. However, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The proposed policy, however, should be flexible to allow developers to utilise the most appropriate technology available at that time, whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.

Boyer are aware that MHA have provided comments in relation to Policy NZ1 – Monmouthshire Net Zero Carbon Homes within other representations and MHA default to those.

- MHA have no comments on Policy CC2 – Renewable Energy Allocation
- MHA have no comments on Policy CC3 – Renewable Energy Generation

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S5 - Green Infrastructure, Landscape and Nature Recovery, requires development proposals to adopt a strategic and proactive placemaking via maintaining, protecting and enhancing the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, access and heritage assets.

As demonstrated within the information submitted as part of the Candidate Site process the proposed scheme has been informed by the site's setting and looks to actively respond to the area's natural characteristics. Most notably this includes the fact that green infrastructure has generally been prioritised in the site thereby representing a logical extension to the existing urban area of St Arvans. Furthermore, MHA acknowledges the site being within the Wye Valley National Landscape (AONB) and will support in respecting any key views.

Again, MHA agree in principle with Policy GI1 – Green Infrastructure and in particular that a GI Statement will be proportionate to the scale, nature and complexity of the development proposed. MHA do question if the policy is required altogether as it a repetition of national planning policy – Planning Policy Wales (12th Ed 2024).

MHA supports that within Policy LC4 - Wye Valley National Landscape (AONB), any development must be subservient to the primary purpose to conserve and enhance the natural beauty of the area. MHA agree that the long term effect of the proposal, and the degree to which its nature and intensity is compatible with the character, purpose and overall management of the National Landscape (AONB) and in Allocation HA13's case, Wye Valley Landscape.

As for Policy NR2 – Severn Estuary Recreational Pressure, MHA note that the policy seeks to protect the Severn Estuary European Marine Site (EMS) within Monmouthshire. MHA acknowledge Allocation HA13 is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site. However, MHA question how significant 16 no dwellings would be on the recreational pressure of the EMS. Furthermore, it is unclear from the policy what the Mitigation Strategy and financial contribution would be. MHA supports in demonstrating that there will be no adverse impact on the integrity of the European Marine Site, however considered that the policy needs further evidence.

- MHA have no comments on Policy GI2 – Trees, Woodland and Hedgerows
- MHA have no comments on Policy LC1 – Landscape Character
- MHA have no comments on Policy LC2 – Blaenavon Industrial Landscape World Heritage Site
- MHA have no comments on Policy LC3 – Bannau Brycheiniog National Park
- MHA have no comments on Policy LC5 – Dark Skies and Lighting
- MHA have no comments on Policy NR1 – Nature Recovery and Geodiversity
- MHA have no comments on Policy NR3 – Protection of Water Sources and the Water Environment
- MHA have no comments on Policy PROW1 – Public Rights of Way

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Comment
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S6 states where existing infrastructure is inadequate to serve the proposed development, new or improved infrastructure and facilities must be provided as part of the proposed development to mitigate any likely adverse impacts. MHA query whether this is required as a separate policy given the need for physical, community and green/blue infrastructure will be assessed on individual site-by-site basis and secured via legal agreements in the form of a Section 106 within the planning application process.

Furthermore, where specific infrastructure works are necessary to facilitate the delivery of allocated sites such as HA13- Land adjacent to Piercefield Public House, St Arvans, these details are specified within the policies which correspond with those individual sites.

- MHA have no comments on Policy IN1– Telecommunication, broadband and other digital infrastructure

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	Support/Comments
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S7 (Affordable Housing) establishes MCC's target for affordable housing over the emerging plan period (2018-2033) as 1,595 – 2,000 homes. This will be achieved in a range of ways including a requirement for all new site allocations to deliver 50% affordable housing on-site which is similarly referenced within the wording for proposed site allocation ref. HA13 – Land adjacent to Piercefield Public House, St Arvans.

In response to above, MHA acknowledge the County's need to accelerate the delivery of affordable housing in response to local need and are committed to working collaboratively with the Council to help meet their affordable housing requirements.

MHA support Policy H2- Residential Development in Main Rural Settlements, in particular the allocation of St Arvans (HA13) for 16 approximate no. homes.

MHA agree that St Arvans accords with National policy contained in PPW12 provides a firm steer that new development should be directed to existing urban areas where there is greatest potential for reducing the need to travel due to the co-location of houses, jobs, shops, services and public transport facilities MCC support in principle the affordable housing provision.

MHA agree with Policy H8 – Housing Mix to assist in addressing the demographic and affordability challenges in Monmouthshire, development proposals of 10 or more homes must include a range and mix of house types, tenure and size, to be agreed by the Council.

In principle MHA support Policy H9– Affordable Housing Exception Sites, however do consider that the thresholds for the thresholds set out in Criteria C (iii) 10 homes or less in Tier 3 Main Rural Settlements and (iv) 5 homes or less in Tier 4 Minor Rural Settlements needs to be increased. Often these Main and Minor Rural settlements have a significant affordable need and the increase in the allowance of both will assist in addressing this.

- MHA have no comments on Policy H1 – Residential Development in Primary and Secondary Settlements
  MHA have no comments on Policy H3 – Residential Development in Minor Rural Settlements
- MHA have no comments on Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use

- MHA have no comments on Policy H5 – Replacement Dwellings in the Open Countryside
- MHA have no comments on Policy H6 – Extension of Rural Dwellings
- MHA have no comments on Policy H7 – Specialist Housing
- MHA have no comments on Strategic Policy S9 – Gypsy and Travellers
- MHA have no comments on Policy GT1 – Gypsy, Traveller and Showpeople Sites

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

MHA fully supports Land adjacent to Piercefield Public House, St Arvans progression as a proposed allocation which is identified as Policy HA13 within the Deposit Plan. As mentioned above the site plays an important role in helping to deliver MCC's Spatial & Growth Strategies from Main Rural Settlements and prioritising future development in the most sustainable locations throughout the region. Furthermore, given the allocations location the site represents a logical extension to the defined urban area of St Arvans, which as a Main rural Settlement.

According to the Candidate Site Assessment, the site performs very well against the assessment methodology with no fundamental constraints identified. Although within the Wye Valley National Landscape (AONB), the proposal is small scale, and the landscape assessment has demonstrated limited harm. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore proposed to allocate the site for approximately 16 homes which MHA support.

MHA support the placemaking principles into the scheme such as Green Infrastructure, Landscape and Nature Recovery, and Sustainable Travel and Highways.

Whilst MHA clearly support the proposed allocation, some comments are provided in relation to specifics in Policy HA13.

In particular, noting the additional principles the site is required to comply with, MHA object on this specific element until further clarification and information on the requirements of the Mitigation Strategy for the recreational impact on the Severn Estuary EMS is provided (See Question 7) and further clarification is requested on the proposed financial contribution.

Moreover, objections are raised regarding the provision for SANG as part of the scheme in the absence of the emerging guidance. The proposed scheme would ensure a generous amount of open space is provided on site through a suitable green space design.

In relation to the provision of a lighting strategy, it is considered that this can be appropriately dealt with at the detailed design stage.

These comments relate to a request for further information as MHA works in collaboration with MCC to bring forward the allocation.

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Strategic Policy S10 – Employment Sites Provision
- MHA have no comments on Policy E1 – Protection of Existing Employment Land
- MHA have no comments on Policy E2 – Non-Allocated Employment Sites
- MHA have no comments on Strategic Policy S11 – Rural Economy
- MHA have no comments on Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions
- MHA have no comments on Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use
- MHA have no comments on Policy RE3 – Agricultural Diversification
- MHA have no comments on Policy RE4 – New Agricultural and Forestry Buildings
- MHA have no comments on Policy RE5 – Intensive Livestock / Free Range Poultry Units

- MHA have no comments on Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Policy EA1 – Employment Allocations
- MHA have no comments on Policy EA2 – Protected Employment Sites

13.	Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Strategic Policy S12 – Visitor Economy
- MHA have no comments on Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside
- MHA have no comments on Policy T2 – Protection of existing tourism facilities

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box *(please use additional sheets as necessary).*

If you are objecting, please state how you would like the Plan to be changed.

MHA support MCC's approach in providing Sustainable Transport in line with Strategic Policy S13. MHA acknowledge this as part of Allocation HA13 under Sustainable Travel and Highways and agree to connect the layout of the proposal to the existing Public Right of Way footpath running along the site's south eastern boundary at the design stage.

As for subsequent Policy ST1, MHA agree with the requirement of a Transport Assessment (TA) to include links to public transport to be considered and if necessary, included. A proportionate approach will be applied to the assessment of TAs and their accordance with the Sustainable Transport Hierarchy. Such as provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including an agreement for proposed A466 road junction, footways, street lighting, crossing provision, connection to the cycle network and the widening and improvement of the existing footway on the A466 as part of ST2 also.

- MHA have no comments on Policy ST1- Sustainable Transport Proposals
- MHA have no comments on Policy ST2 – Highway Hierarchy
- MHA have no comments on Policy- ST3 Freight
- MHA have no comments on Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas
- MHA have no comments on Policy ST5- Transport Schemes
- MHA have no comments on Policy ST6 – Protection of Redundant Routes

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Strategic Policy S14- Town, Local and Neighbourhood Centres
- MHA have no comments on Policy RC1 – Central Shopping and Commercial Areas
- MHA have no comments on Policy RC2 – Primary Shopping Frontages
- MHA have no comments on Policy RC3 – Local Centres and Neighbourhood Centres/Shops MHA have no comments on Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Strategic Policy S15 – Community and Recreation Facilities
- MHA have no comments on Policy CI1 – Retention of Existing Community Facilities
- MHA have no comments on Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas

- MHA have no comments on Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing
- MHA have no comments on Policy CI4 – Areas of Amenity Importance

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- MHA have no comments on Strategic Policy S16 – Sustainable Minerals Management to Safeguarding
- MHA have no comments on Policy M1 – Local Building and Walling Stone.
- MHA have no comments on Policy M3 – Mineral Site Buffer Zones
- MHA have no comments on Strategic Policy S17 – Sustainable Waste Management
- MHA have no comments on Policy W1 – Waste Management Facilities
- MHA have no comments on Policy W2 – Agricultural Land – Disposal of Inert Waste
- MHA have no comments on Policy W3 – Identified Potential Waste Management Sites

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

MHA supports the assessment of the Candidate Site for Allocation HA13- Land adjacent to Piercefield Public House. Specifically, it is agreed the site performs well against the assessment methodology with no fundamental constraints identified. Although within the Wye Valley National Landscape (AONB), the proposal is small scale, and the landscape assessment has demonstrated limited harm. The site also meets key policy requirements, including 50% affordable housing and net zero carbon homes, demonstrating its viability and deliverability. It is therefore agreed to allocate the site for approximately 16 homes.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	Yes
	No:	

If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1663

Richborough

illustrative masterplan



Sustainable drainage with wild life and **biodiversity** benefits

Residential land proposed to deliver over 150 new **sustainable homes,** 50% affordable

Enhancements to existing **Green Infrastructure**

Recreational spaces

Community facilities(0.23Ha)

Sustainable drainage with wild life and **biodiversity** benefits

Access to employment site from **existing** infrastructure

EV charging in all car parks

Yards **shielded** from housing to reduce noise impact

Public right of way

Green Corridor with wild life and **biodiversity** benefits

High Quality sustainable commercial buildings

Potential **access** to employment site from **existing** road infrastructure

Employment site boundary (4.5 hectares, delivering approx 125,000sq.ft GFA)

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Richborough	Turley
Address:		[redacted]
Telephone No:		

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Key Issues, Challenges and Opportunities

The key issues, challenges and opportunities facing the County (as summarised at Section 3.1 and 3.2 of the Deposit Plan) highlight the key considerations for the Replacement LDP (RLDP) over the plan period. Many of the points listed are interlinked, for example, demographic issues (i.e. an ageing population and smaller economically active population), high house prices, affordability and an increasing need for affordable housing.

Addressing issues such as housing affordability and rebalancing demography across the County will be essential to achieving sustainable economic growth. These matters must be considered holistically to ensure an appropriate policy response through the RLDP.

We support the recognition in Paragraph 3.1.1 that the RLDP must look for opportunities to increase the number of affordable homes, but, importantly, also ensure a range and choice of homes. The RLDP correctly acknowledges this will require both market and affordable dwellings being incorporated in new developments.

Paragraph 3.1.1 also lists wider issues relating to matters such as the climate, landscape and the environment. All of which will need to be balanced to ensure that sufficient growth is brought forward and in the correct places.

We support the recognition that, whilst the site search sequence must prioritise suitable/sustainable previously developed land, there is limited brownfield land available in Monmouthshire. Paragraph 3.1.6 also correctly acknowledges that there are other environmental, social and economic considerations when selecting sites that need to be balanced in a Monmouthshire context. The RLDP must therefore bring forward both brownfield and greenfield sites to address the issues identified in Section 3.1.

In this context, we welcome the acceptance (at Paragraph 3.1.7) that, given the widespread distribution of BMV agricultural land throughout Monmouthshire, this must be reflected in the spatial strategy. To address the issues and challenges identified in Section 3.1, a suitable level of growth must be taken forward, which will inevitably require appropriate development on greenfield sites, some of which will be BMV agricultural land.

The 3rd bullet point under Paragraph 3.1.1 states that to help reduce carbon emissions, all new strategic allocations will be required to be "within walking distance of existing town centres." This should be amended to read:

"…within walking***/cycling*** distance of existing town centres…"

It is agreed that the need to sustain rural communities is an important issue for the RLDP. To address this issue, the spatial strategy must support growth in appropriate locations, with sufficient levels of development directed to the most sustainable rural settlements. This will be critical to sustaining locally accessible services and facilities.

Whilst there are challenges and issues to be addressed, the Deposit Plan rightly acknowledges that the County has a number of opportunities to address these challenges/issues. This includes the opportunities associated with growth from both the Cardiff Capital Region and Western Gateway. It is important that the spatial strategy and level of growth taken forward in the plan capitalises on these opportunities.

Vision

Achieving the 'Vision' at Paragraph 4.1.1 will be reliant on the policy response set out in the remainder of the RLDP bringing forward an appropriate growth and spatial strategy over the plan period. This strategy must enable distribution of development to the most sustainable settlements.

Objectives

We are broadly in support of the objectives set out in Table 1. We do have some observations and suggested changes to specific objectives, as set out below.

Objective 1 Economic Growth/Employment

Reference should be made to the increased role that home and agile working can be expected to make over the plan period. This is recognised elsewhere in the RLDP (for example, Paragraph 6.3.14). The plan should seek to encourage/facilitate the increased propensity for home/agile working, alongside the need to bring forward 'traditional' business spaces.

Objective 2 Town and Local Centres

The objective should recognise the importance of sustaining and enhancing all four County towns and its three local centres. As worded, no reference is made to Raglan, which is designated as a local centre. Local centres such as Raglan serve an important purpose, not only to its local population, but also the surrounding hinterlands. The RLDP must help to sustain and enhance these centres by directing sufficient levels of growth to settlements such as Raglan. For consistency, Bulwark Local Centre should also be listed. The wording should be amended as follows:

"To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth***, Raglan, Bulwark*** and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street."

Objective 6 Land

We welcome the recognition that whilst opportunities for previously developed land should be maximised when selecting sites, and BMV agricultural land should be protected, this will not always be possible in a County like Monmouthshire. This provides important context for the 'search sequence' that must be followed when identifying new housing allocations.

Objective 9 Demography

We support the need for the RLDP to create a more balanced demography and socially and economically sustainable communities. This will be important if the issues identified in Section 3 of the Deposit Plan are to be addressed. To do so, sufficient levels of growth must be planned for, and in the right locations.

Objective 10 Housing

The importance of providing new affordable housing is supported. Given the issues faced by the County, a wide-ranging choice of new homes must be provided for existing and future residents. Mixed and balanced communities must be created, bringing forward both affordable and market housing. Delivering sufficient housing growth (affordable and market) will be critical if other objectives identified in the plan are to be achieved – for example, Objective 1 (Economic Growth/Employment), Objective 9 (Demography) and Objective 12 (Communities). The objective should therefore be changed to make specific reference to a choice of homes, including both market and affordable.

"To provide urgently needed ***market and*** affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents."

Objective 13 Rural Communities

We agree that to sustain existing rural communities it will be necessary to provide development opportunities of an appropriate scale and location in rural areas. Such development will need to include a range of housing types, including both affordable and market housing. The distribution of new development to key rural settlements, particularly those placed higher in the settlement hierarchy (i.e. Secondary Settlements), will be critical to achieving Objective 13.

Objective 13 should be amended to read:

"To sustain existing rural communities as far as possible by providing ***market and*** affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy."

Objective 15 Accessibility

The recognition that accessibility can be achieved via a variety of means (including mixed use development, improved internet connectivity (which will improve opportunities to work from home), and providing opportunities for active travel) is supported.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S1 makes provision for 6,210 homes. It should be made clear that this figure does not represent a maximum provision or cap on future development. Elsewhere in the Plan, the figure is referred to as delivering 'approximately' 6,210 homes which reflects that it is not an absolute figure. The policy wording should be amended to reflect this with 'approximately' or 'at least' added ahead of 6,210 homes.

"…the Plan will make provision for:

• ***at least*** 6,210* homes to meet a housing requirement of 5,400 homes…"

We support the use of a flexibility allowance when calculating the number of new homes to be provided through the Plan. The Development Plans Manual is clear that a development plan will not be effective if it cannot accommodate changing circumstances. As such, it requires a flexibility allowance to be embedded into the plan. Whilst the Manual identifies a starting point of 10%, it is made clear that the level of flexibility is for individual LPAs to determine. In this case the Council has provided appropriate evidence to justify the use of a 15% flexibility allowance (Paragraph 3.3 of the Housing Background Paper (October 2024)).

Paragraph 6.2.2 of the Deposit Plan notes that the level of growth has been set to address local evidence-based issues and objectives. These include the delivery of affordable homes, sustainable economic growth, and rebalancing the demography to enable young people to choose to live in the County. The level of growth seeks to address those key issues, while also responding to the climate and nature emergency.

We support the Council's assertion that the level of growth is in general conformity with Future Wales's overall strategy (Paragraph 6.2.3 of the Deposit Plan). The Council rightly note that the level of growth will assist in addressing the core issues identified in Section 3.1, without harming or undermining the Welsh Government's objectives for the wider South East Wales region.

We do, however, consider that a higher level of growth could be supported to best address the core issues and objectives identified in the Plan, whilst remaining in general conformity with Future Wales. Adopting a higher level of growth would provide a more positive platform to address the key issues, challenges and opportunities identified in Section 3 (including demographic issues (i.e. an ageing population and smaller economically active

population), high house prices, affordability, an increasing need for affordable housing and opportunities associated with growth from both the Cardiff Capital Region and Bristol region). We strongly disagree with the assertion that higher growth in Monmouthshire would impede the National Growth Area (through displacement of population, housing and jobs from elsewhere in the region). Notwithstanding this, it is recognised that the Council has had to consider pragmatically how best to progress the RLDP in light of the challenges faced.

Paragraph 6.3.2 notes that the Plan is focused on the delivery of affordable homes to specifically address housing affordability. The provision of new affordable housing is supported, but addressing housing affordability will require a number of policy levers to be applied through the Plan. This should include the delivery of a wide range and choice of housing types and sizes, of both market and affordable tenures. This will be an important part of helping younger people stay in or move to the area, whilst also allowing older people to downsize from larger family homes. Doing so will create more age-balanced sustainable and resilient communities, as well as increase the economically active population. The importance of providing new market housing, alongside affordable homes, should not be overlooked in the Plan.

Policy S1 aims to provide a level of growth that maximises the extent to which the identified issues and objectives can be addressed – including the delivery of affordable homes, sustainable economic growth and rebalancing demography. To do so, it is important that sufficient growth is provided for, but also that it is distributed where these issues are most acute. This issue is returned to in our response to Strategic Policy S2.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 states that the main focus for new development will be distributed based on a defined settlement hierarchy, which comprises four tiers (ranging from Primary Settlements (Tier 1) to Minor Rural Settlements (Tier 4). Outside of the identified tiers, 'open countryside' policies will apply.

Policy S2 provides an indicative percentage of distribution for residential growth across each tier, with 85% being directed to Tier 1, 6% to Tier 2 and 9% to Tier 3 and 4. We will return to the indicative percentage distribution of residential growth later in this response.

We are supportive of the adoption of a settlement hierarchy. We also strongly support the identification of Monmouth and Caldicot as Primary Settlements and Raglan as one of three Secondary Settlements. It is important that the distribution of growth reflects the fact that the first two tiers clearly represent the most sustainable settlements.

The 'Sustainable Settlement Appraisal' (December 2022) confirms the dominant role of the County towns of Abergavenny, Chepstow, Caldicot and Monmouth. All four are shown to score highly against the methodology set out in the Sustainable Settlement Appraisal. The assessment confirms that the four settlements function as service centres for their rural hinterlands and benefit from a (relative) level of self-containment, when compared to other settlements within the County. The Appraisal therefore concludes that it is appropriate for the four settlements to be identified as Primary Settlements, which can be maintained and strengthened through future sustainable developments. We support this conclusion, and the identification of these settlements as the first tier in the Deposit Plan.

Whilst identified as a 'Primary Settlement' in the Sustainable Settlement Appraisal, Caldicot is also identified as part of a wider cluster – 'Severnside'. Paragraph 11.5 of the Sustainable Settlement Appraisal recognises that (together with the Primary Settlements of Abergavenny, Chepstow and Monmouth), *"the Primary Settlement of Caldicot including the Severnside cluster with its good transport links, employment opportunities and range of services offers the most sustainable location for future growth".*

As reflected in the Deposit Plan (and evidence base documents), Caldicot should form the main focus for the Severnside cluster. Neither Policy S2 or Table 2 (contained within the supporting text) break down the proposed distribution of growth between Caldicot and the settlements making up the wider Severnside Area. It is important that the Plan is clear (in Policy S2 or the supporting text) that Caldicot, as the Primary Settlement within a wider cluster, will accommodate the majority of new growth in the area. This would be consistent with the proposed allocation of Caldicot East, which accounts for 770 of the 810 new homes proposed to be allocated in Caldicot/Severnside over the plan period.

We also support the identification of Monmouth as a Primary Settlement. The evidence base clearly demonstrates the dominant role of the four Primary Settlements, which include Monmouth. Monmouth is therefore identified as one of the most sustainable locations for future growth in the County. It benefits from access to good quality public transport and active travel, together with a broad range of facilities, services and employment opportunities. Given the planned improvements at the Monmouth Wastewater Treatment Works, it is appropriate for Monmouth to accommodate an appropriate level of new housing and employment development.

We strongly support the identification of Raglan as one of three Secondary Settlements – forming Tier 2 of the hierarchy. The Sustainable Settlement Appraisal demonstrates that outside of the Primary Settlements there is a clear group of higher performing Secondary Settlements. It is clear from the Sustainable Settlement Appraisal that a distinction should be made between the Secondary Settlements and the lower tier rural settlements (for example, by reference to the weighted scores set out in Table 15). It is therefore

appropriate to separate the Secondary Settlements from the other 'Main Rural' and 'Minor Rural' Settlements in the hierarchy. This distinction must also be reflected in the distribution of growth (and site allocations) between Tier 2 and Tier 3/4.

Whilst the Secondary Settlements are set apart from the other rural settlements in the hierarchy, this is not always clearly reflected elsewhere in the Deposit Plan. There are examples where the supporting text fails to clearly distinguish the three Secondary Settlements from other rural settlements. For example, Paragraph 6.4.2 of the Deposit Plan states that new development will be focused on the Primary Settlements, together with a lower level of growth in the most sustainable lower tier settlements. It is important that Tier 2 is given due weight when compared to the other rural settlements in Tier 3 and 4. We recommend that the RLDP refers to the Secondary Settlements of Penperlleni, Raglan and Usk separately to the other smaller rural settlements.

The Sustainable Settlement Appraisal supports the identification of additional sustainable growth at the Secondary Settlements. It is important that the scale of growth reflects the role, function and size of the Secondary Settlements. This must also acknowledge that these settlements currently provide local services/facilities to meet the needs of their immediate vicinities.

As stated above, we strongly support the identification of Raglan as a Secondary Settlement. It scores strongly against the assessment methodology set out in the Sustainable Settlement Appraisal, being identified as a Tier 2 settlement when scored against the three main assessment principles (transport services/accessibility; community services and facilities; and employment opportunity). In comparison, Penperlleni (another Secondary Settlement) is scored as a combination of Tier 2 and 3 against the three principles.

Raglan scores well against all three principles on which the audit was based. Raglan is shown to score well in terms of sustainable transport and accessibility, despite lacking a train station due its comparable strength in other categories. It also scores highly in terms of availability of services and facilities, noting that its local centre meets the daily needs of its local population and those living in the surrounding area. Raglan is also among the higher performing settlements in terms of employment opportunities. Raglan is also identified as one of the settlements with the highest levels of self-containment, behind only Monmouth, Abergavenny, Chepstow, Caldicot and Usk.

The Sustainable Settlement Appraisal also notes that Raglan has a higher than average proportion of its population in the over 65s group. In contrast, Raglan has one of the lowest percentages of working age groups of the larger settlements. This is seen as potentially having longer term implications for local employment if there are insufficient economically active residents to support local employers. To address this issue sufficient growth must be directed to Raglan through allocations made in the RLDP. We therefore strongly support the allocation of new homes at Monmouth Road in Raglan in Policy HA10.

Strategic Policy S2 sets out an indicative percentage distribution for residential growth for Tier 2 as a whole – which is 6% (350 homes). By comparison, Tier 3 and 4 combined has an indicative percentage distribution for residential growth of 9% (556 homes). Whilst it is appropriate for some growth to be directed to the most sustainable Main Rural and Minor Rural Settlements, there should be a clear distinction between the level of growth

distributed to Tier 2 and Tiers 3/4. We would advocate increasing the proportion of growth directed to the Tier 2 settlements, ahead of Tiers 3/4.

Under Policy H2 of the RLDP, new development within the Main Rural Settlements is supported, providing consideration is given to matters such as potential impact on village form, character etc. Given the nature of the Main Rural Settlements, it is appropriate to direct some development to such settlements, particularly given the high level of affordable need. Developments are, however, likely to be at a smaller scale than would be acceptable in the Primary and Secondary Settlements. It is important that the distribution of residential growth reflects this.

Table 2 sets out an indicative spatial distribution of housing provision. It confirms that the requirement for new housing allocations is reduced by completions, existing commitments, and allowances for small sites and windfalls. Having reviewed Table 2 (and the supporting evidence base documents), we would urge an element of caution as to the contribution to be made by small sites and windfall sites over the plan period. By over-estimating the contribution from this element, there is a risk that the need for development provided through new allocations required will be under-estimated.

There is risk that past rates of delivery will not continue at the same levels over the RLDP plan period. This position is based on two key issues:

(1) a clear shift in national planning policy, whereby the emphasis on a plan led approach has been strengthened. This could result in a reduction in the number of windfall sites delivered over the next Plan; and

(2) given the nature of Monmouthshire, there is limited scope for new windfall sites within development boundaries. There is a finite supply of such sites, and it is reasonable to expect delivery from this element to be below levels seen over the past 10 years.

This is reflected in Table 10 of the Housing Background Paper (October 2024), which shows a notable drop in small site completions from 2021/22 onwards. For example, the three years prior to this date saw completions from small sites of 84 (2018/19), 104 (2019/20) and 81 (2020/21). The completion rates then dropped to 45 (2021/22), 61 (2022/23) and 58 (2023/24).

Whilst it is noted that a degree of discounting has been applied by the Council, there is still a risk that supply will be below that estimated for small sites and windfalls. We are of the view that the delivery of 68 dwellings per annum through small sites (from Year 7 onwards) could be ambitious.

Taking the Tier 3/4 settlements, an allowance of 231 homes is made for small sites/windfalls. Given the above, it would be more appropriate to allocate a greater number of dwellings to the Tier 1/2 settlements, rather than rely on small sites/windfalls coming forward in lower tier settlements. Redistributing some of this allowance to Tier 1/2 settlements could be picked up by increases to existing allocations (where appropriate).

In summary, we support focusing new development on the most sustainable settlements – the identified Primary and Secondary Settlements. We also support Caldicot being the main focus for new development within the wider Severnside Area. This approach is consistent with the evidence base, which concludes that the Primary Settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside), Monmouth and Chepstow have been

identified as being the most sustainable locations with capacity to deliver more significant growth, followed by the three Secondary Settlements of Penperlleni, Raglan and Usk.

Ensuring sufficient levels of growth within the Primary and Secondary Settlements will ensure that the RLDP is best placed to address the key issues, challenges and objectives identified in Section 3 of the Deposit Plan. This approach will also enable development to come forward that can help sustain existing services and facilities, together with securing new facilities where they do not exist. It will also provide opportunities to improve access to modes of transport other than the car, by providing improved service levels and increased patronage.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy OC1 – New built development in the Open Countryside

PPW recognises that there may be exceptional circumstances where new built development may be acceptable in the open countryside. This could be for the benefit of the rural economy and sustaining rural communities. This is particularly important in a County such as Monmouthshire. It is therefore important that Policy OC1 allows sufficient flexibility for appropriate development to be considered. The policy, or supporting text, should be amended to clarify that PPW (Paragraph 3.60) notes that development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. New development away from existing settlements should be more strictly controlled.

Policy GW1 – Green Wedge Designations

Paragraph 7.2.3 of the Deposit Plan confirms that the existing green wedges (as defined in the adopted LDP) have been reviewed to assess whether they continue to meet the purposes (as defined in PPW12). It is welcomed that the Council has undertaken a review of green wedge designations in support of Policy GW1.

Having reviewed the Green Wedge Assessment (March 2024), we strongly support the continued identification of a green wedge designation between Rogiet and Caldicot. The

evidence base clearly demonstrates that the green wedge in this location continues to serve an important purpose.

The Assessment concludes that the parcels of land immediately west of Caldicot (identified as RC3 and RC4) make a strong contribution to preventing the coalescence of the two settlements. Both parcels are identified as playing a major buffer role and having high potential for green wedge designation (the highest potential for designation). The assessment also notes that release of either parcel as a whole would remove the separation between Rogiet and Caldicot. It goes on to state that even partial development would narrow the gap between Rogiet and Caldicot and weaken the contribution of adjacent green wedge land to the green wedge purposes.

We therefore support the continued identification of a green wedge between Rogiet and Caldicot in Policy GW1.

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S3 – Sustainable Placemaking & High Quality Design

We agree with the importance placed on placemaking and high quality design and therefore broadly support Strategic Policy S3.

Criterion ii) requires development to incorporate an appropriate mix of uses (where applicable) to minimise the need to travel and to maximise opportunities for active travel and public transport use. The supporting text to Policy S3 should recognise that this could be achieved either through bringing forward mixed-use developments, or through the appropriate location of new development alongside other existing uses (i.e. allowing the co-location of existing and new uses). Criterion ii) should also be expanded to acknowledge the role promoting the ability to work from home can play in terms of minimising the need to travel. The increased propensity for home or agile working presents an opportunity for sustainable placemaking that should be reflected in Policy S3.

Criterion iv) should be amended to include the underlined text;

'Protect and***, where possible,*** enhance the natural, historic and built environments…'.

We have no specific comments in relation to the following policies

- Policy PM1 – Creating well-designed places;
- Policy PM2– Environmental Amenity;
- Policy PM3 – Advertisements;
- Policy HE1 – Conservation Areas;
- Policy HE2 – Design of Shop Fronts in Conservation Areas;
- Policy HE3 – Roman Town of Caerwent.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S4 – Climate Change

Paragraph 9.3.1 of the Deposit Plan notes that, in accordance with national guidance, Strategic Policy S4 seeks to steer highly vulnerable development away from flood risk areas. Criterion (i) of Policy S4 should amended to reflect this wording.

"i) Avoiding locating ***highly vulnerable*** development in areas at risk of flooding…"

Criterion vi) requires land to be used efficiently and encourages co-locating uses to minimise the overall need to travel and maximise opportunities for sustainable travel. The role that can be played by increased home/remote working in minimising the need to travel should also be recognised in Policy S4 or the supporting text. This can be achieved by a range of measures including local shared workspaces, improved residential broadband connectivity and providing flexible house types capable of accommodating home working.

We have no comments on the following policies:

- Policy NZ1 – Monmouthshire Net Zero Carbon Homes
- Policy CC1 – Sustainable Drainage Systems
- Policy CC2 – Renewable Energy Allocation

- Policy CC3 – Renewable Energy Generation

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery

The policy wording should be clarified to recognise that not all the key functions listed in Criterion (i) to (vi) will be relevant to every site/development proposal.

Policy GI2 – Trees, Woodland and Hedgerows

The first paragraph of Policy GI2 should be amended to read:

"Development proposals that would ***have an unacceptable*** adverse~~ly~~ impact on trees, woodland and hedgerows that are either a public amenity, of cultural heritage, provide important ecosystem services, are protected, or significantly contribute to GI connectivity will not be permitted."

Policy NR2 – Severn Estuary Recreational Pressure

The supporting text to Policy NR2 provides important context in terms of how developments can mitigate against adverse impacts on the integrity of the European Marine Site (EMS).

This could include proportionate financial contributions to fund on-site SAC/SPA conservation measures, but also provision of alternative natural greenspace as part of new housing developments (within the identified proximity of the EMS). It is important that the policy allows flexibility for sites to demonstrate how any potential adverse impacts will be mitigated.

Paragraph 10.12.3 also confirms that Supplementary Planning Guidance (SPG) will provide further information on the mechanisms for delivery of such measures. It is important that the SPG is made available early in the plan period to help guide developments.

We have no comment on the following policies:

- Policy GI1 – Green Infrastructure

- Policy LC1 – Landscape Character
- Policy LC2 – Blaenavon Industrial Landscape World Heritage Site
- Policy LC3 – Bannau Brycheiniog National Park
- Policy LC4 – Wye Valley National Landscape (AONB)
- Policy LC5 – Dark Skies and Lighting
- Policy NR1 – Nature Recovery and Geodiversity
- Policy NR3 – Protection of Water Sources and the Water Environment
- Policy PROW1 – Public Rights of Way

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S6 – Infrastructure

We support the inclusion of 'where possible' in respect of infrastructure improvements being provided prior to occupation. This should be considered on a site by site basis as proposals come forward through the development management process.

Strategic Policy S6 should be amended to refer to the need for the phased delivery of infrastructure for larger, strategic sites given the way in which such sites are delivered. Appropriate triggers could be agreed as part of legal agreements associated with any future permissions.

The requirement for future management and maintenance must be proportionate and considered on a site-by-site basis.

We support the recognition that improvements in infrastructure, facilities, services and related works sought (and secured through legal agreements) must be necessary to make development acceptable. We also support the reference to due regard being paid to the overall development viability. As the policy states, viability and priority considerations should be determined on the basis of the individual circumstances of each case

The policy should be amended to make it clear that the list of infrastructure provisions set out will not apply to all schemes.

Policy IN1– Telecommunication, broadband and other digital infrastructure

No comment.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy H1 – Residential Development in Primary and Secondary Settlements

We support the acknowledgement that new residential development will be acceptable within the settlement boundaries of Primary/Secondary Settlements.

Policy H2 – Residential Development in Main Rural Settlements

We support the general principle of identifying settlement boundaries and provision within the RLDP for an appropriate amount of housing development in the Main Rural Settlements. Given the nature of the villages in this tier, it is appropriate for Policy H2 to require the suitability of such developments to be considered in the context of the village form and character.

Policy H3 – Residential Development in Minor Rural Settlements

Given the nature of the 'Minor Rural Settlements' it is appropriate for Policy H3 to clarify that housing development in such settlements will be limited to minor small scale rounding off, infilling or conversion/subdivision of existing properties.

Paragraph 12.4.1 of the Deposit Plan also refers to possible exceptions for affordable housing on exception sites. This is not, however, referred to in Policy H3 itself. Policy H3 should be amended to refer to the potential for exception sites, cross referring to the need for any such sites to be in accordance with Policy H9.

Paragraph 12.5.1

Paragraph 12.5.1 states that new build dwellings in the open countryside will not be permitted unless justified by the types of developments noted in Policy S2 and Policy OC1.

Reference should also be made to Policy H9. This policy allows for new affordable housing outside of settlement boundaries, subject to specific conditions.

Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use

No comment.

Policy H5 – Replacement Dwellings in the Open Countryside

No comment.

Policy H6 – Extension of Rural Dwellings

No comment.

Policy H7 – Specialist Housing

Specific support for specialist housing within or adjacent to defined settlement boundaries is welcomed. As Paragraph 12.9.1 recognises, specialist housing can come in a range of formats. Some of which will provide a higher level of care onsite and cater for residents with a higher level of dependency. For higher dependency facilities there is a likelihood that residents will be less reliant on the use of public transport or access to shops etc. Whilst beneficial for such facilities to be located within or adjacent to settlements (i.e. to provide access to GP surgeries), it is important to recognise that different locational requirements will apply. Greater flexibility should therefore be applied when assessing higher dependency facilities against Policy H7 (a). This should be clarified in Policy H7 or the supporting text.

Policy H8 – Housing Mix

We support the principle of ensuring that new housing proposals include a range and mix of house types, tenure and size. It is appropriate for the policy to not be overly prescriptive and allow an appropriate housing to be agreed taking into account the nature of specific sites, settlements etc. It is important that whilst 1-3 bedroom properties are provided, provision can still be made for larger properties as part of a housing mix, providing they do not make up an excessive proportion of any mix.

S7 – Affordable Housing

We support the identification of a range of means to achieve the affordable housing target for the plan period.

Policy S7 should be amended to include reference to the potential need for affordable homes to be provided off-site or a financial contribution in lieu of on-site provision. This is referenced in the supporting text, but not the policy itself.

The supporting text (Paragraph 13.1.6) also recognises there may instances where viability makes it difficult to achieve the full affordable housing requirements. In such cases, the supporting text recognises that the Council may be willing to negotiate on the number of affordable homes to be provided. Again, this is not referenced in the policy wording itself.

Policy H9– Affordable Housing Exception Sites

We support the inclusion of a policy which allows for affordable housing exception sites adjoining defined settlements. The policy is, however, subject to a restriction on the

number of dwellings that can be brought forward. The threshold varies depending on the settlement tier.

Paragraph 13.2.3 recognises that there may be a need for flexibility in this approach, although no reference is made to this within Policy H9 itself. The thresholds set in Policy H9 are considered too restrictive for the higher tier settlements. The threshold should be increased for Tier 1 and 2 settlements to allow greater flexibility for exception sites to come forward. The remaining criteria in Policy H9 (and other RLDP policies) provide sufficient controls to ensure that any development proposed under this policy is appropriate to the specific site and settlement context.

Unduly restricting the scale of exception sites could impede the delivery of such sites. This would limit the contribution exception sites can make to addressing key issues such as access to affordable housing and affordability. The policy should be amended to allow flexibility for the appropriate scale of exception schemes to be considered on a case by case basis, taking into account the nature and character of the site and wider settlement.

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We have no specific comments on the following residential site allocation policies:

- Policy HA1, HA5, HA6, HA8, HA9, HA11, HA12, HA13, HA14, HA15, HA16, HA17, HA18.

Strategic Policy S8 – Site Allocation Placemaking Principles

Under the 'Sustainable Communities' heading reference to the incorporation of ULEV charging points should be amended to refer to read:

"ULEV charging points***/infrastructure***".

This would be consistent with Policy NZ1, which requires developments to provide all new homes with ULEV charging infrastructure. This will provide flexibility for a percentage of new dwellings to be served by charging points, with all remaining dwellings benefiting from the necessary infrastructure to allow future connection.

Reference to 'agreed standards' under the green infrastructure, landscape and nature recovery heading should be clarified. As currently worded it is unclear what agreed standards are being referred. Clarification should be provided in the policy itself or supporting text.

We recommend the following amendment to the second bullet point under the 'Sustainable Travel and Highways' heading.

"Sites must contribute to active travel and public transport improvements as ***appropriate*** ~~necessary~~."

The third bullet point under the 'Sustainable Travel and Highways' heading should also be amended to reflect the need for consideration to be given to *unacceptable* adverse effects, rather than adverse effects per se. The wording should be amended as follows:

"Ensure that the development does not ***result in an unacceptable adverse effect upon*** ~~***adversely affect***~~ the safety, capacity and operation of the highway network."

Policy HA2- Land to the East of Caldicot/North of Portskewett

We strongly support the identification of land east of Caldicot/North of Portskewett as a residential-led, strategic allocation. As addressed in response to Policy S2, it is appropriate for a significant amount of growth to be directed to Caldicot, as the primary settlement of the wider Severnside cluster. In this context, it is both appropriate and necessary for growth of a strategic scale to be accommodated within Caldicot.

The candidate site process and wider RLDP evidence base demonstrates that directing strategic growth to the east of the settlement is the most appropriate means of accommodating new development. Opportunities for development elsewhere in the settlement, particularly at the scale required, are significantly constrained. This has been considered in detail through the various stages of the RLDP process, but growth to the north and south of the settlement is constrained by existing road (to the north) and rail (to the south) infrastructure. This acts as a barrier to future development.

Land to the west of Caldicot is also heavily constrained by issues such as flooding and designation as a green wedge. This is demonstrated by the assessment of a candidate site promoted for residential/employment development to the west of Caldicot. The site (referred to as Ifton Manor) failed to progress past Stage 3A/B in the candidate site process. The 'Candidate Site Assessment Report' (2024) confirms that the site did not progress due to its designation as a green wedge. 'The Green Wedge Assessment' (March 2024) found that the site makes a strong contribution to preventing the coalescence of Rogiet and Caldicot. Importantly, the Green Wedge Assessment concluded that the release of the site as a whole would remove the separation between Rogiet and Caldicot, and any partial development in this narrow gap would weaken the contribution of adjacent green wedge land to the green wedge purposes. Overall, the Candidate Site Assessment Report concluded that there are more suitable alternative sites in the Severnside area and, therefore, the site was not allocated in the RLDP.

In contrast, the Candidate Site Assessment Report found that the site to the east of Caldicot is a sustainably located edge of settlement site, that is partly brownfield land. The

allocation will extend the existing settlement to the north-east, adjacent to recent development to the south side of the B4245. The Report found that the site performs well against the site search sequence, with good links to shops, open space and employment uses, with facilities in the town centre just over a 20 minute walk. It is also recognised that these links will be strengthened as part of the proposed development via active travel links throughout the site. The site already has good links to existing schools, but a new primary school and community playing fields will form part of the development. This will benefit both new and existing residents.

While the site is in close proximity to heritage designations, the Candidate Site Assessment Report found that no significant constraints are identified on the site. The site is also in close proximity to a SSSI, but no built development will take place on these sensitive areas.

The Candidate Site Assessment Report concludes that land to the east of Caldicot offers the opportunity to create an exemplar residential-led mixed-use development. It will provide new market and affordable homes (with a 50/50 split), together with a new school, community playing fields, a neighbourhood centre (which could include commercial, or community uses), employment uses and new public open space.

A significant amount of technical work has been prepared in support of the allocation. This demonstrates that any site constraints can be satisfactorily addressed, and that development of the site would be deliverable and viable. The technical work undertaken has informed a comprehensive masterplan for the site. This work demonstrates that the site can comfortably accommodate at least 770 homes. Further technical work will be prepared to support future planning application(s) in due course.

In summary, land east of Caldicot/north of Portskewett is the most logical and appropriate location for the level of growth needed within Caldicot and Severnside more widely. It provides an opportunity to bring forward a sustainable, edge of settlement strategic scale development, which will deliver new homes, together with opportunities for other supporting uses such as employment, open space, education, commercial and community uses.

Whilst we strongly support the principle of allocating land to the east of Caldicot/north of Portskewett for a strategic scale residential led development, amendments are required to Policy HA2 and the supporting text.

Comments and changes to the supporting text are addressed first, before the policy wording itself.

Supporting Text to Policy HA2

Paragraph 14.4.2 refers to the 'school combined with the local centre' providing a key focal point of the site. This should be expanded to recognise the role of the community playing fields also proposed.

"The school combined with the local centre ***and community playing fields*** will provide a key focal point of the site."

Paragraph 14.4.3 recognises that Crick Road will act as an important central spine through the proposed allocation. It goes onto state that the road should be incorporated into the development as an active frontage. It is agreed that the approach to development along

Crick Road will be a fundamental part of the masterplan, ensuring that development on either side of the road is brought forward in a cohesive way. Extensive masterplan work has already been carried out for the site, which envisages that Crick Road will act as a green corridor through the site. Active frontages to Crick Road will be incorporated, where appropriate. This will be confirmed through the ongoing design process, but there may be parts of Crick Road where development sits slightly further back from the road, behind existing or proposed green infrastructure. Frontages may also be set back in places to reflect easements associated with existing water infrastructure within the eastern part of the site. Paragraph 14.4.3 should be amended as follows:

"Crick Road provides a central ***green*** spine through the development and will be incorporated into the site as an active frontage***, where appropriate and possible, to*** provid***eing*** legibility for the community across the site. This will act as a gateway to the site as a whole and ensure the development either side of the road is integrated in a cohesive manner."

Paragraph 14.4.3 recognises that a masterplan is being developed for the site. It continues by stating that this process will identify key issues and opportunities within the site as well as establishing a design code and key land use parameters. Paragraph 14.4.3 should be amended to clarify that the masterplan is intended to set key principles and general land use parameters for the site, rather than act as a design code per se. The use of the word 'code' could lead to confusion. The masterplan will be developed further as part of future planning application(s) for the allocation. At that point, any application will be supported by an indicative masterplan and a parameter plan(s). The paragraph should be amended as follows:

"A masterplan is being developed for the site, which identifies key issues and opportunities within the site as well as establishing ***a*** ***key*** design ***principles*** ***code*** and ***key*** land use parameters."

Paragraph 14.4.4 notes that an 'active travel link' will be required from the site to provide access all year round. Active travel connections will form an important part of the development but will be delivered through a range of active travel links, rather than a single link. This will provide choice and resilience across the year when accessing the town centre and other points of interest. Routes will likely include those following the main roads, through areas of open space to the west of the disused railway corridor and by connecting to existing routes (for example, through the Castle Grounds and the former MoD railway 'Greenway'). Paragraph 14.4.4 should be amended to read:

"***An A***ctive travel links ***is will be*** required ***which*** to provide access to the site all year round."

Paragraph 14.4.5 notes the proximity of the site to the Severn Estuary European Marine site (EMS). Reference should be made to the potential for any potential impacts to the EMS to be addressed through financial contributions and/or provision of open space as part of the development.

Policy HA2 – Policy Wording

The policy should be amended to add 'approximately' before 770 homes (as below). This would be consistent with the supporting text and policy wording used for other strategic allocations.

"Sustainable Communities

a) Provision of a mixed-use development containing the following key uses:

• ***approximately*** 770 homes including 50% affordable homes.

• …"

Under the 'Allocation Type' column in Policy HA2, we recommend adding 'community playing fields' to the list of development likely to be provided through the allocation. This would be consistent with the wider policy wording and supporting text.

Under the 'Sustainable Communities' heading the fifth bullet point states that the allocation will include a minimum of 1 ha of Class B1 employment land. Whilst small scale employment uses may be appropriate on the site, the policy should be amended to remove reference to the provision of a minimum of 1 ha of Class B1 employment land. The policy should allow flexibility in terms of the appropriate form and quantum of any employment use that could be brought forward. This should be guided by the ongoing masterplan process and an assessment of market demand for such uses. This would also be influenced by the availability of existing Class B1 space within walking distance of the site at Castlegate Business Park.

This issue is addressed in more detail in our response to Policy S10 and Policy EA1, but for completeness it is noted that the Employment Land Review (ELR) identifies a need for 3.5 ha of Class B1 space across the plan period. This is described as an upper level in the ELR. Policy EA1 of the Deposit Plan, however, proposes the allocation of 8.09 ha for solely Class B1 use. A further 40 ha of land is proposed to be allocated for Class B1/B2/B8 use. A significant amount of land is therefore identified for Class B1 use in the Deposit Plan.

Policy HA2 should therefore be amended to allow the appropriateness of incorporating employment uses within the development to be considered as part of any future planning applications. It is not appropriate or necessary for the policy to set a specific or minimum requirement for a quantum of space to be provided.

As noted in relation to Paragraph 14.4.3, the treatment of Crick Road will be an important part of the proposed development. It will be integral to bringing development forward in a comprehensive and cohesive manner. To reflect the design aspiration for Crick Road, Criterion (b) under the 'Sustainable Communities' heading should be amended. Whilst an active frontage will be promoted along Crick Road, this may not be appropriate or feasible along the full length, or may in places be set behind existing/new green infrastructure (for example, hedgerows). The text should therefore be amended as follows:

"b) Crick Road must be incorporated into the site as ***a distinctive central green spine with*** an active street frontage ***(where appropriate and feasible),*** providing cohesion and a gateway for the development as a whole."

Criterion (e) under the 'Green Infrastructure, Landscape and Nature Recovery' heading states that less dense development should be provided on the edge of the site. This is in line with the emerging design principles, which propose lower density/looser grain development along the edges of the masterplan area, or where the site sits alongside green areas. To clarify, when referring to the 'edge of the site', this should not be taken as

including along Crick Road which is seen as central to the proposed masterplan (rather than an 'edge').

Criterion (f) under the 'Green Infrastructure, Landscape and Nature Recovery' heading requires development to consider/respond positively to the setting of the Grade II Listed Building, the Conservation Area, Country Park and views to the nearby Scheduled Ancient Monument. It goes onto state that no built development will take place within these sensitive areas. Criterion (f) should be amended, or further clarification provided within the supporting text, to acknowledge that attenuation features are expected to be located west of the former MoD railway line. These features would be located outside of the Country Park, but within the wider Conservation Area boundary.

Under the 'Sustainable Travel and Highways' heading, under Criterion (o) the bullet point referring to amending the speed limit on Crick Road should be deleted. Whilst we support the revision of the speed limit along Crick Road to 20mph, this will be subject to a process that falls outside of planning. Reference could be made to this aspiration in the supporting text rather than the policy itself.

Under the 'Sustainable Travel and Highways' heading, the following amendments should be made to the bullet point in Criterion (o) relating to public transport links. Whilst public transport links will be an important part of the development, reference to links being provided "throughout the site" should be deleted. The technical work undertaken to date in support of the allocation indicates that it would be best to serve public transport from the existing road network. Appropriate connections (by foot) would then be provided from within the site to bus stops on the existing road network. The policy should allow flexibility for the best approach to public transport infrastructure to be determined through the planning application process, rather than 'require' links 'throughout the site' at this stage. The criterion should also be amended to add reference to 'proportionate' financial contributions to public transport.

Criterion (o) should be amended as follows:

"Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

- An agreement must be entered into with the Council to facilitate the construction of multiple development accesses along Crick Road and any necessary access points along the B4245 to the north of the site;
- A minimum of a 2 metre footway for pedestrians over the site's frontages linking to existing footways;
- ~~*Revision of speed limits along Crick Road to 20mph, the location of which to be agreed with MCC.*~~
- Provision of a public transport link to be provided along Crick Road ~~*and throughout the site*~~, details of which to be agreed with MCC, including any ~~*necessary*~~ *proportionate* financial contributions to improve nearby infrastructure."

Criterion (p) under the 'Flood Risk and Sustainable Drainage Systems' heading states that no built development will be permitted within the part of the site located in the floodplain.

Clarification should be provided within the policy or supporting text that attenuation features may be located within Flood Zone 2/3.

The policy concludes by noting that a masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Council prior to the determination of any future planning application(s). We support the recognition that the appropriate mechanism to progress/agree the masterplan for the site will be through forthcoming planning applications.

A copy of an indicative masterplan is included for the site at p.124 of the Deposit Plan. It has been adapted by the Council from a masterplan submitted by the site promoters through the RLDP process. The Deposit Plan does not set out what the purpose or status is of the masterplan, other than referring to it as an indicative masterplan. The policy or supporting text should be amended to make it clear that the masterplan is purely informative and is not intended to carry any weight. As stated in the policy itself, it will be for the masterplan to be developed and agreed through the development management process. Any such applications should not be tied to the indicative masterplan included in the Deposit Plan.

Policy HA4- Land at Leasbrook, Monmouth

Whilst we support the allocation of new residential development in Monmouth, we maintain that it would be more appropriate for strategic development to be directed to the west of the settlement, at land north of Wonastow Road. This is based on the comparative constraints for each site, together with the wider benefits that could be delivered by bringing forward a mixed-use development at land north of Wonastow Road.

As noted in the Deposit Plan and supporting evidence base, land at Leasbrook is subject to a number of issues and constraints that would need to be overcome. Issues include flooding and the ability to provide suitable access arrangements, ecological constraints/sensitivity relating to the sites proximity to two Special Areas of Conservation (SACs) and landscape sensitivity associated with the adjacent Dixton Conservation Area and the Lower Wye Valley Landscape of Historic Interest. The site also comprises a higher proportion of BMV agricultural land, when compared with land at Wonastow Road.

The Integrated Sustainability Statement (ISA) provides an assessment of three growth options considered around the edge of Monmouth. The assessment demonstrates that the land at Wonastow Road performs better than the proposed allocation at Leasbrook in a number of areas, including 'economy/employment', 'natural resources', 'biodiversity/geodiversity', 'historic environment' and 'landscape'.

Reference to the 'Landscape Sensitivity Study' (2020) confirms that the candidate sites making up the proposed Leasbrook allocation were determined to be of High/Medium sensitivity, whilst those promoted at Wonastow Road sites were identified as being of Medium sensitivity. This is reflected in Paragraph 4.27 of the Study, which concludes that:

"Monmouth is constrained by the Wye Valley AONB and its setting, by the courses and green corridors of the River Wye and River Monnow and by exposed slopes and rising land to the north, south, east and west. The area which has the most opportunity is west of recent expansion at Wonastow."

The Study continues by stating that development within the high/medium sensitivity area (in which the Leasbrook site is located), would be less preferable to the medium sensitivity sites considered west of Wonastow (Paragraph 4.28).

As a mixed-use development, the site at land north of Wonastow Road performs strongly in relation to economic factors and employment. Aside from delivering 4.5 ha of employment land, alongside residential and community uses, the site is also adjacent to an established employment area.

Development at land north of Wonastow Road would represent a continuation of the western expansion of Monmouth, which has delivered new residential development at Kingswood Gate and employment development north of Wonastow Road. This would result in benefits to not only new residents, but also existing residents of Kingswood Gate. The mixed-use development proposed at land north of Wonastow Road would expand the existing residential community in this area and bring forward additional employment, new open space and community uses. The nature and type of community use proposed is flexible, but could include the provision of land for a new community building or other community space. There is also potential for a small local shop to serve existing and new residents.

Land north of Wonastow Road is capable of accommodating a range of housing, including market and affordable (at a 50/50 split). Based on the design work undertaken to date, it is envisaged that the site could accommodate c.175 dwellings. The site also has the potential to accommodate specialist housing (for example, with an element of care) as part of the development to meet unmet need in the County. Such a use would complement the wider mixed-use nature of the proposal.

As demonstrated by the Vision Document submitted in support of the candidate site process, and Vision Document Addendum supporting these representations, land north of Wonastow Road is not subject to any significant constraints. The supporting material demonstrates that a landscape-led, mixed-use development could be delivered at the site, comprising c.175 dwellings, public open space, land for community uses and 4.5 ha of Class B1/B2/B8 land.

In summary, land north of Wonastow Road is subject to less constraints than the proposed allocated land at Leasbrook. It would also form a logical extension to Monmouth, building on the recent expansion of the settlement to the west taken forward through the adopted LDP. It would continue this direction of growth, and reinforce the co-location of employment, residential and community uses in this area. This would be to the benefit of new residents but also those living in the Kingswood Gate development.

We are therefore of the view that land north of Wonastow Road should be allocated as a mixed-use development, rather than a solely employment allocation. This is addressed in more detail in relation to Policy EA1/EA1c.

We have no comments on Policy HA5, HA6, HA7, HA8, HA9, HA11, HA12, HA13, HA14, HA15, HA16, HA17, HA18.

Policy HA10- Land South of Monmouth Road, Raglan

We strongly support the allocation of land south of Monmouth Road for residential development. As per our response to Policy S2, it is important that new residential development is directed to Raglan, as one of three Tier 2 settlements. Raglan is a sustainable settlement, which acts as a hub to the surrounding wider rural settlements. As demonstrated by the RLDP evidence base, Raglan is capable of accommodating an appropriate level of growth within the plan period.

As a settlement, it already performs strongly in comparison to others, but also has two new employment allocations within the RLDP. The employment allocations will provide c.6 ha of new employment space within Raglan, which will further support the settlement and its further growth.

The preferred direction of growth in Raglan has been carefully considered by the Council through the RLDP process. The Candidate Site Assessment Report (2024) confirms that two sites were considered for residential development – land south of Monmouth Road and land at Usk Road. The Report confirms that land south of Monmouth Road performs well against the site search sequence with good access to local amenities and has no fundamental constraints. This reflects the fact that the site is adjacent to the settlement boundary and is extremely well located to Raglan's centre. The Report concluded that the site at Usk Road should not be allocated on the basis of there being sufficient, and more suitable land available for residential development within Raglan to accommodate its housing need.

We support this conclusion and the allocation of land south of Monmouth Road for residential development. The site provides an opportunity to bring forward a high quality, landscape led residential development, which will include a significant amount of new public open space. The site also has the potential to accommodate community uses, the nature/type of which will be determined at the application stage based on local need. This could potentially include a new village hall, other community buildings (including agile working space) or community space. An area of 0.2 ha is set aside as part of the illustrative parameter plan for community use.

The site was originally proposed through the candidate site process as a larger parcel of land (extending to 7.6 ha), which would deliver c.85 homes. This larger site has been assessed through the candidate site and ISA process.

The Candidate Site Assessment Report confirms that a reduced area to the candidate site submission is proposed for allocation in the RLDP. This is now reflected in Policy HA10. Whilst we strongly support the allocation of the site through the RLDP, as per our previous submissions to the candidate site and RLDP process, we maintain that the whole site is appropriate for development should more development be directed to Raglan. As it stands, the remainder of the site would be subject to promotion as a second phase through a future development plan.

Notwithstanding this, as stated in our response to other policies in the Deposit Plan, we believe that a greater proportion of new development should be directed to Tier 2 settlements, as opposed to those in Tier 3/4. Should an uplift to the level of growth

directed to Raglan be identified as necessary, the allocation could be easily extended to include the full 7.6 ha originally promoted.

As the candidate site process progressed, two masterplan options were presented to the Council in a Supplemental Vision Document (which is resubmitted with these representations for completeness). This reflected the flexibility the site offers, meaning development can be brought forward to best fit the spatial strategy and distribution of growth.

The first masterplan option was as per the original candidate site submission – a single phase development of circa 85 dwellings. The masterplan was, however, refined to reflect discussions during the candidate site process. The Vision Document demonstrates that this level of development would continue to be an appropriate scale and form of development for the settlement.

The second masterplan option provides the opportunity for a smaller scale development, which could be brought forward as part of a phased approach. This option would deliver a development of circa 54 dwellings through the RLDP (as proposed to be allocated). This would be a standalone development, which would represent a sustainable and viable development for Raglan. This approach also provides the opportunity to bring forward a second phase of development through a future plan. The two phases of development would be capable of delivering approximately 100 dwellings.

Whilst two masterplan options have been presented, which would deliver c.54 or c.85 dwellings through the RLDP – there is greater flexibility as to how any phased approach is designed. For example, should the Council wish to bring forward a number of new homes somewhere between the two options, this could be easily accommodated, whilst continuing to adopt the same design principles.

In summary, we support the support the allocation of the site as proposed in the RLDP. The site does, however, offer the option of an increased scale of development, should more development need to be identified in Raglan at a later stage of the plan process. Should the smaller (c.54 dwelling scheme) be taken forward in the Plan, we would advocate adding reference in the supporting to the total site having potential to accommodate further dwellings in a second phase beyond the plan period. To address this, we would recommend adding ***'*within this plan period'*** to the policy wording when referring to the number of dwellings proposed.

Whilst we support Policy HA10 in principle we do have some comments and required changes to the policy and supporting text.

Paragraph 14.12.1 of the RLDP refers to land south of Monmouth Road comprising approximately 7.6 ha. This is assumed to refer to the full candidate site area as originally submitted. Whilst we would support the full site area being taken forward through the Plan, the current site allocation relates to 4.5 ha. The paragraph should be updated to refer to 4.5 ha to be consistent with the policy itself. Alternatively, the supporting text should clarify that the site as a whole extends to 7.6 ha, with 4.5 ha allocated for development during this plan period.

Turning to the policy wording, changes are necessary to the requirement listed under the 'Sustainable Travel and Highways' heading.

The third bullet point under Criterion (g) states that an emergency secondary access should be provided on to Station Road. The Transport Assessment prepared for the site does not identify a need for a secondary vehicular access to Station Road. A connection is provided, but this is envisaged to be a cycle/pedestrian link. An emergency access could be provided if deemed necessary, but this should be determined through the development management process.

The fourth bullet point under Criterion (g) refers to financial contributions to carry out any necessary improvements to the local and strategic highway network. Aside from provision of the main site access, the only improvements envisaged by the Transport Assessment are already captured in the other bullet points under Criterion (g) – i.e. footways/crossings of Monmouth Road, linkages from the site to Staton Road. The Transport Assessment does not identify a need for any improvements to the local or strategic highway network itself as a result of the proposed development. The fourth bullet point should therefore be deleted.

For clarity the fifth bullet point should be amended to read make reference to 'proportionate' financial contributions.

The sixth bullet point under Criterion (g) refers to the provision of pedestrian and cycle links, including a footpath link to Station Road. The current masterplan allows for a foot/cycle link to Station Road, which will provide access to the Primary School and village centre. Should a link be required along Station Road itself, the development would make a proportionate contribution to this.

The wording should be amended as follows:

"Sustainable Travel and Highways

g) Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:

• An agreement with the Council for the proposed Monmouth Road junction, footways, street lighting, crossing provision and the widening and improvement of the existing footway on Monmouth Road.

• Primary access arrangements on to Monmouth Road.

• An emergency secondary access on to Station Road***, if necessary***.

~~***• Financial contributions to carry out any necessary improvements to the local and strategic highway network.***~~

•***Proportionate*** ~~***Ff***~~financial contributions to improve public transport services and nearby infrastructure."

Strategic Policy S9 – Gypsy and Travellers

Strategic Policy S9 states that land will be made available at Bradley Farm, Crick to meet unmet Gypsy and Traveller accommodation needs. Other than noting that the site will accommodate 7 pitches, no further information is given in Strategic Policy S9 as to what will be expected from any development at the site – for example, placemaking principles to be adhered to, infrastructure requirements etc. Whilst the supporting text (Paragraph 15.1.1-

15.1.3) provides commentary regarding the need for new pitches, there is no reference or information provided in relation to the actual site identified to accommodate this need.

This is not consistent with the approach taken to the allocation of other residential uses (in Policy HA1-HA18), which all have specific expectations set for any future development. The policy and/or supporting text should be amended to provide additional detail to help guide any future development of the site.

Policy GT1 – Gypsy, Traveller and Showpeople Sites

No comment.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S10 – Employment Sites Provision

Strategic Policy S10 confirms that the RLDP provides for 57 ha of employment land to meet a minimum requirement of 38 ha of land for Class B1, B2 and B8 employment uses. Paragraph 16.1.1 notes that this level of growth (and the spatial strategy) seeks to address factors that are impacting on employment growth in Monmouthshire by promoting higher employment growth, supporting greater labour force retention and reducing the net out-flow of workers. The level of job growth is also said to align with the projected population and housing growth.

Paragraph 16.2.1 confirms that the minimum requirement of 38 ha of employment land (as set out in Policy S1) is taken from the Employment Land Review (ELR) (November 2022). This is based on forecasts using past take-up rates, together with the adoption of a buffer. This figure is also broken down to individual land use types in the ELR, with a requirement of 3.5 ha identified for Class B1 uses. The ELR notes that given changes to the office market and a policy to encourage homeworking, it is estimated this represents an upper level of need for office land.

It is noted that Policy EA1 allocates 5.09 ha of Class B1 uses on industrial and business sites, together with a further 3 ha of land on mixed use allocations. Policy EA1 also identifies a further 40 ha of land which is intended to be either Class B1, B2 or B8. The LDP therefore makes provision for a range of Class B1 uses over the plan period, which is in excess of the

ELR forecasts. Should such a level of Class B1 space be taken forward, it is important that there is sufficient flexibility for development proposals to respond to market conditions and demands over the plan period. This is particularly pertinent where 'minimum' levels of Class B1 use are identified for the strategic mixed-use allocations.

Policy E1 – Protection of Existing Employment Land

Policy E1 states that proposals that will result in the loss of existing or allocated industrial and business sites/premises to other uses will only be permitted if certain criterion are met. Paragraph 16.5.3 acknowledges that there may be instances where sites allocated or designated for employment use are no longer appropriate. In such cases the Council may be willing to review employment allocations/designations and consider whether an alternative and more beneficial use of the site or premises would be appropriate. This is an important recognition to ensure sufficient flexibility is provided through the plan to ensure sites come forward and with the most appropriate mix of uses. In this context, it is critical that Policy E1 is written, and interpreted through the development management process, to reflect this.

Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

Policy RE6 makes provision for recreation and leisure uses outside of settlement boundaries providing they are small scale and of an informal nature, and re-use/adapt existing buildings where possible. Allowance is made for new buildings of an appropriate scale in exceptional circumstances. Such schemes would also be considered against Policy OC1.

The policy is clearly aimed at recreational and leisure uses of a small scale nature. There may be instances where larger scale recreational/leisure facilities could come forward in the County. Whilst this may be in exceptional circumstances, allowance should be made for this to be considered if appropriate uses are proposed during the plan period. Such uses could bring a number of benefits, including access to recreation and leisure opportunities, but also job creation and the attraction of visitors to the County. Such sites would need to be carefully sited, but it is important that the plan allows for uses of this scale/nature to be considered.

We have no comments on the following policies.

- Policy E2 – Non-Allocated Employment Sites
- Strategic Policy S11 – Rural Economy
- Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions
- Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use
- Policy RE3 – Agricultural Diversification
- Policy RE4 – New Agricultural and Forestry Buildings
- Policy RE5 – Intensive Livestock / Free Range Poultry Units

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy EA1 – Employment Allocations

EA1c Land north of Wonastow Road, Monmouth – 4.5 ha (B1, B2, B8)

We support the allocation of land north of Wonastow Road for 4.5 ha of Class B1, B2 and B8 use. The Candidate Site Assessment Report concludes that the site forms a logical extension to adjoining employment uses and would provide much needed employment land in Monmouth. This is supported by the ELR, which notes that the Wonastow Road area is the primary industrial node in Monmouth and an important location in the northern half of the county. The ELR also notes that the area provides a range of engineering, storage, building suppliers, office and auto service uses. Given the existing range of uses in the area, it is logical to provide flexibility for uses to come forward across Class B1, B2 and B8. This will allow the site to respond to market demand across the plan period.

Whilst allocated solely as an industrial and business site, we maintain that the site should be taken forward as a mixed-use residential and employment development. A total of 10.97 ha of land was put forward as a mixed-use development through the candidate site process. This included a mix of residential, employment and community uses. At the time of the candidate site submission, 2.6 ha of land was proposed for employment use. During the course of the RLDP process, it has been agreed that the employment element of the proposed development could be increased to 4.5 ha (as reflected in Policy EA1). This means that there is still 6.2 ha of land available for residential use, together with land for community uses and public open space.

Whilst the nature/type of community use proposed would be determined at a later stage, it is envisaged that this could include the provision of land for new community buildings or other community space. This could include space for agile working to encourage home working (both for new and existing residents). The site could also be suitable for a small local shop to serve existing and new residents. The site is also capable of accommodating a range of housing, including market and affordable (at a 50/50 split) and specialist housing (for example, with an element of care) to meet unmet need.

The allocation of land north of Wonastow Road would form a logical extension to Monmouth, building on its recent expansion to the west through a mixed-use allocation in the adopted LDP for c.450 new homes and 6.5 ha of industrial/business use. The allocated

site has come forward on a phased basis, with a large part of the residential element now benefiting from planning permission and having been constructed. Planning permission has also been granted for c.3.72 ha of the proposed employment provision.

The allocation of land north of Wonastow Road as a mixed use would see new homes co-located with existing and proposed employment uses. It would continue the direction of growth taken forward in the adopted LDP, with the new employment land and community uses benefiting not only new residents, but also those living in the recently completed Kingswood Gate development. The proposals provide an opportunity to help reinforce this co-location of homes with jobs and services.

As set out in the Vision Document submitted in support of the candidate site process, placemaking is central to the proposed development. A mixed-use development at the site would:

- Bring forward a mix of uses, providing residential, commercial and community uses within close proximity of each other.
- The proposals will include a variety of housing, with a mix of housing types and tenures, including an opportunity to accommodate an element of specialist housing. The scheme also acknowledges the significant increase in those choosing and able to work from home.
- The scheme is within a comfortable walk of the existing services and facilities available in Monmouth. A range of employment uses will also be available as part of and adjacent the scheme.
- The proposals will be designed to encourage walking and use of public transport. This is likely to include measures to help improve existing infrastructure (for the benefit of new and existing residents).
- The scheme will be designed at an appropriate density to make the best use of land, but also reflect its setting.
- The proposals will be designed to provide a hierarchy of streets, which introduce different characters and functions.
- Green infrastructure will form an integral part of the proposals.

The Vision Document (and Vision Document Addendum) and other technical work submitted through the RLDP process demonstrates that the site is not subject to any constraints that cannot be addressed through careful site design and mitigation. The masterplanning work to date presents a landscape-led development, which will deliver a mix of uses whilst respecting the character and identity of its surroundings. Connectivity is also a key part of the vision, with an emphasis on new cycling and walking routes that are well connected both within the scheme, to neighbouring developments and to the wider network of footways in the local area.

Existing landscape features will be retained and enhanced, providing a framework to the masterplan. A mixed-use development provides an opportunity to create an expansion of Monmouth as a town, increasing its vitality and viability, to create an integrated community

comprising of housing, employment, agile working facilities, industry, recreation facilities, woodlands, hedgerows, community facilities, a LEAP and public open spaces.

Given the increased provision of employment land since the original candidate site submission (from 2.6 ha to 4.5 ha), a Vision Document Addendum has been prepared and is submitted in support of these representations. The Vision Document Addendum demonstrates how a mixed-use scheme could be brought forward to deliver 4.5 ha of employment land, together with c. 175 new homes, community uses and public open space.

In summary, we support the allocation of land north of Wonastow Road for employment use through Policy EA1 (EA1c). We do, however, maintain that the wider site promoted through the RLDP process should be identified as a mixed-use allocation, comprising 4.5 ha of employment land, together with new homes and community space.

EA1m Land to the East of Caldicot/North of Portskewett

Policy EA1 notes that 1 ha of Class B1 will be provided as part of the mixed-use allocation on land east of Caldicot/north of Portskewett. Whilst we support the principle of potentially including a small element of employment land as part of the allocation, this should be based on market demand and considered as future planning applications come forward. As noted in response to Strategic Policy S10, the RLDP allocates in excess of the forecasted need for new Class B1 space over the plan period. Flexibility must be applied when considering development proposals that come forward at the site over the plan period. This will ensure the most appropriate mix of uses are delivered.

Policy EA2 – Protected Employment Sites

No comment.

13.	Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)	
Is your representation in support or objection?	Support:	X
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S12 – Visitor Economy

We welcome the support for development proposals that support Monmouthshire's visitor economy and promote sustainable forms of tourism. It is important that it is recognised

that such uses could incorporate a wide range of different facilities, including active and leisure uses of a particular type/scale.

Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside

No comment.

Policy T2 – Protection of existing tourism facilities

No comment.

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S13 – Sustainable Transport

We support reference to measures aimed at encouraging remote access to work and other services. Such measures can help to reduce the need to travel. Achieving a higher propensity of home working will reduce the need to travel in the first instance, which accords with the initial aim of the sustainable transport hierarchy.

Paragraph 19.1.1 of the Deposit Plan rightly acknowledges the need for development proposals to accord with the Sustainable Transport Hierarchy. This is reflected in Policy S13 itself. Paragraph 19.1.5 does, however, make the important acknowledgement that Monmouthshire is predominantly a rural county. It is recognised that travel by car will still be a requirement in some rural areas.

Paragraph 19.1.6 encourages the use of innovative solutions to provide connections in rural locations, through measures such as car sharing schemes, e-bikes etc. Other solutions to reduce travel in the first place, such as improvements to digital infrastructure to facilitate remote access to employment, education and other services from rural locations should also be encouraged and recognised.

Policy ST1-- Sustainable Transport Proposals

No comment.

Policy ST2 – Highway Hierarchy

No comment.

Policy ST5- Transport Schemes

We welcome the support for active travel schemes. The RLDP should, however, better define what is being 'safeguarded' when referring to specific schemes. This could be provided by way of additional information appended to the RLDP or by signposting to other documents or sources of information.

Policy ST3 – Freight

No comment.

Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas

No comment.

Policy ST6 – Protection of Redundant Routes

We support recognition of the benefits of repurposing former rail routes for future sustainable transport use.

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	X
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S14- Town, Local and Neighbourhood Centres

We support the identification of a retail hierarchy and the recognition of Raglan as a Local Centre, together with Caldicot and Monmouth Town Centres at the top of the hierarchy. New housing led allocations proposed through the RLDP will help support the ongoing function and role of such centres.

Policy RC3 – Local Centres and Neighbourhood Centres/Shops

Policy RC3 rightly seeks to maintain and strengthen the role and function of local centres and neighbourhood centres/shops by focusing retail and complimentary commercial uses of an appropriate scale and nature within them. Such centres play an important role in resident's everyday lives.

Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

It is important to recognise that there may be an element of small scale retail brought forward as part of the strategic site allocation. Whilst such provision is likely to be small scale, and in the form of a neighbourhood centre, it should not be unduly constrained by other policies in the Plan.

Policy RC1 – Central Shopping and Commercial Areas
No comment.

Policy RC2 – Primary Shopping Frontages

No comment.

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S15 – Community and Recreation Facilities

We support reference to such uses being permitted both within and adjoining settlement boundaries. This is important given the wide range of uses covered by the policy.

The policy also seeks to protect facilities from development proposals that would result in their 'unjustified' lost. The supporting text clarifies that recreation facilities in the context of Policy S15 are those primarily used by local residents, as opposed to the more tourist related activities associated with visitors.

It is important that flexibility is applied in the interpretation of Policy S15 and other supporting policies, such as Policy CI3. The nature and specific circumstances of particular uses must be considered, particularly where there may be a crossover between the function different facilities serve (for example, those serving both local residents and visitors).

Policy CI1 – Retention of Existing Community Facilities
No comment.

Policy CI2 – Provision of Formal and Informal Open Space and Allotments/Community Growing Areas

No comment.

Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing

It is important that flexibility is applied in the interpretation of Policy CI3. This is particularly important where there is a crossover in the nature and function of certain facilities (for example, those serving both local residents and visitors).

Policy CI4 – Areas of Amenity Importance

Policy CI4 as worded is very brief and simply states that proposals that lead to the loss of AAI will not be permitted. Paragraph 21.5.4 clarifies that proposals that are complimentary to the use/function of the identified AAI, and would not lead to their loss, may be considered appropriate. Such examples could include active travel routes and drainage infrastructure. Such recognition is important to avoid being unduly restrictive when considering the potential use of such areas.

It is noted that the Proposals Map includes a new AIA on land that forms part of the strategic allocation east of Caldicot. The land, to the west of the disused railway line, is identified for designation on the basis of its size, contribution to local amenity and location within the development boundary (in the RLDP). Whilst we don't object to the identification of the land as an AIA, it does demonstrate the importance of ensuring Policy CI4 is not interpretated in an overly restrictive way.

No built development is proposed to the west of the disused railway line as part of the allocation. The land is intended to provide new open space and green infrastructure. It is, however, likely to also accommodate drainage infrastructure and new/improved active travel routes. Whilst the supporting text indicates that such uses would likely be acceptable, this should be made clearer in the policy wording itself.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	N/A
	Objection:	N/A

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We have no comments on the following policies:

- Strategic Policy S16 – Sustainable Minerals Management

- Policy M1 – Local Building and Walling Stone
- Policy M2 – Minerals Safeguarding Areas
- Policy M3 – Mineral Site Buffer Zones
- Strategic Policy S17 – Sustainable Waste Management
- Policy W1 – Waste Management Facilities
- Policy W2 – Agricultural Land – Disposal of Inert Waste
- Policy W3 – Identified Potential Waste Management Sites

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

RLDP Appendix 8: Infrastructure Delivery Plan

Land to the East of Caldicot/North of Portskewett

Under the 'key site issues and constraints' column, it is noted that:

"Location to the north of Caldicot Castle Scheduled Ancient Monument, the Caldicot Castle Country Park, Conservation Area and Area of Amenity Importance – no built development to take place in these areas."

It should be clarified that whilst no new housing is proposed within these areas, it is likely that attenuation features and active travel links will be accommodated in the Conservation Area and Area of Amenity Importance.

It is also noted that Crick Road must be incorporated into the site as an active street frontage providing cohesion and a gateway for the development as a whole. Whilst the treatment of Crick Road will be a key part of the masterplan process, including active frontages to it, there may be instances where this is not appropriate or feasible.

Key infrastructure requirements

We have the following comments on the 'Key Infrastructure Requirements' listed.

Active travel routes are listed, with the delivery body noted as the 'developer'. It should be noted that active travel routes could be delivered by the developer, or by means of financial contributions with the ultimate delivery by the Council.

Under the highways and sustainable travel heading, speed limit revisions to Crick Road are included. Whilst revisions to the speed limit would be supported, this process would fall outside of planning. If it is retained on the list for context, we would recommend the 'delivery body' column is changed to list the Council.

Under the nature recovery heading, it is noted that net benefit for biodiversity will be provided as part of the masterplanning. The delivery body is listed as Monmouthshire County Council – we recommend this is changed to Developer/Monmouthshire County Council.

Land south of Monmouth Road, Raglan

The 'Site Description' section states that the site benefits from less than 15 minutes walking time to Raglan's centre, with other key services and facilities including a school in closer proximity. This should be amended to reflect the wording in the main body of the Deposit Plan, which reflects that the site is actually less than 10 minutes walking time to Raglan's centre.

Under the highways and sustainable travel heading, an emergency access point to Station Road is listed as a requirement. As it stands, the Transport Assessment for the site does not identify a need for an emergency access. This will be considered further as part of any future planning application.

The requirements listed also refer to off-site highway infrastructure contributions, as necessary including, local and strategic highway network improvements. As noted in response to Policy HA10, the Transport Assessment completed for the site does not identify a need for any off-site infrastructure works to the local/strategic highway network.

Under the nature recovery heading, it is noted that net benefit for biodiversity will be provided as part of the masterplanning. The delivery body is listed as Monmouthshire County Council – we recommend this is changed to Developer/Monmouthshire County Council.

RLDP Appendix 9 – Housing Trajectory

We support the timings and phasing of development set out in Table 1 in relation to Caldicot East and land south of Monmouth Road, Raglan.

In terms of Caldicot East specifically, the developer has front loaded the process with supporting documentation and technical reports, which will continue to be progressed in tandem with the RLDP process. The developer specialises in bringing sites to market and making sure that housebuilder delivery partners can get on site as soon as possible. The benefits of 50% affordable housing in relation to delivery rates also apply to this site

We will continue to engage with the Housing Trajectory Stakeholder Group to provide further information in support of the assumptions made as required.

Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP) (September 2024)

We have concerns regarding some of the conclusions drawn in the ISA. These are set out below.

Section 6.5 Summary appraisal findings for strategic growth area options and Appendix D: ISA of Strategic Growth Area Options

Table 6.5 Summary findings for Monmouth strategic growth options

Overall, we consider that Option G should be ranked higher in a number of categories considered by the ISA. Examples of this are set out below.

Under the 'Economy and Employment' heading, the growth area to the west of Monmouth (Option G) is ranked 2nd, out of the three areas. Option G should be ranked 1st given its proximity to the Wonastow Road Industrial Estate and the fact mixed-use development is proposed (with 4.5 ha of new employment land proposed). Whilst slightly further from the town centre, Option G is still easily accessible by foot, cycle or public transport. Overall, the provision of a significant amount of new employment space should result in Option G being ranked highest under this category.

Under the 'Population and Communities' heading, Option G is ranked 2nd. Reference to Appendix D of the ISA notes that all Options have the potential to support the growth of existing communities. However, the ISA concludes this is likely to be more achievable through Options H and I, given their location in terms of access to the town centre and that each option would extend existing parts of Monmouth, supporting regeneration at these locations. Option G is identified as being *"arguably more isolated in this respect, being less well connected to the town centre."*

Whilst slightly further from the town centre, Option G is located adjacent to the recent Kingswood Gate residential development. Further expansion to the west of Monmouth has the potential to grow and help reinforce a sense of community in this area. This would be helped by the fact that growth proposed west of Monmouth is mixed-use, including residential, employment and community use. We are therefore of the view that each of the Options should be ranked equally.

Under the 'Climate Change (including Flood Risk)' heading, all Options are ranked equally. Appendix D of the ISA states that *'all Options perform on a par in terms of potential flood risk.'* However, part of Option I is located within an area of flood risk (Flood Zone 2). Whilst a relatively small proportion of the site, the area of flood risk impacts on the main access to the site. We would therefore argue that Option G should be ranked higher than Option I.

Table 6.6: Summary findings for Severnside strategic growth options

Overall, we consider that Option J should be ranked higher in a number of categories considered by the ISA. Examples of this are set out below.

Under the 'Natural Resources' heading, Option J is ranked as 2nd. Appendix D provides more information as to how this conclusion was reached:

"Options L and K are therefore best performing in this respect as they would necessitate the least amount of loss of BMV land. All Options comprise entirely greenfield sites and

consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Options L and K perform better than Options J and M in relation to protecting the County's soil/ and resource."

This is incorrect as Option J includes a significant proportion of brownfield land, comprising an equestrian centre. Option J should be identified as the best performing, as the only Option that includes brownfield land. Option J should therefore be ranked 1st.

Under the 'Historic Environment' heading, Option J is ranked 3rd out of the growth areas considered. Appendix D notes that:

"Development at Option J would likely lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. Development within this growth area would result in the loss of large areas of greenfield/open space in the setting of the castle which is also a Country Park. On this basis, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified; however, there is some uncertainty at this stage."

Technical work submitted in support of the allocation of Option J considers the Conservation Area and settings of the Castle, Berries Mound and Mount Ballan House. It notes that whilst the site lies partly within the Caldicot Conservation Area, it is beyond the areas from where the Conservation Area principally derives its special interest (including the Castle and Church). The illustrative masterplan also demonstrates that the western area of the site, which lies within the Conservation Area, will be retained as public open space and integrated into Caldicot Castle Country Park, retaining views to the Castle and Church. It also shows that the eastern area of the site could be delivered for residential development without harming the heritage significance of the Castle, Church or Conservation Area.

Under the 'Landscape' heading, Option J is ranked 3rd. We strongly disagree with Option L being ranked higher than Option J. Development within Option L would have a significant impact on the role and function of a designated green wedge. This would likely lead to the coalescence between Rogiet and Caldicot. Option L should be ranked lower as a result.

Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan (September 2024)

The Habitats Regulations Assessment (HRA) notes that given the high sensitivity of the Severn Estuary SPA/SAC/Ramsar to impacts from recreational pressure, adverse effects on its site integrity due to additional residential development cannot be excluded. On that basis, the HRA anticipates that mitigation measures will be required to avoid adverse effects on the SPA/Ramsar. The HRA notes that these measures could be delivered in the form of Strategic Access Management and Monitoring (SAMM) in the estuary itself, and/or through access enhancements and improvements to appropriately sited, existing or newly developed greenspaces.

The HRA notes that enhancing existing greenspaces or opening new areas of greenspace to public access will be an important part of mitigating recreational pressure. The rationale

behind alternative greenspace provision is to attract a certain proportion of local residents, thereby reducing the recreational burden in more sensitive European sites.

In this context, the HRA states that the strategic growth areas of Caldicot and Chepstow, should be the main focus of mitigation. It continues by noting that the most obvious candidate site for improvements is the Caldicot Castle Country Park (CCCP), which is approximately equidistant from existing residential development in Caldicot compared to the Severn Estuary SPA/Ramsar/SAC, thus representing a realistic alternative location geographically. It is noted that the CCCP is owned and operated by Monmouthshire County Council, which would facilitate the delivery of mitigation measures compared to sites under multiple ownership. The CCCP is recognised as already being an attractive destination for visitors and any mitigation measures would have to improve the capacity of the park to attract further visitors. The HRA sets out a list of potential enhancements, which may include:

• Provision of a variety of routes (ideally at least one circular route) leading out from the castle into the woodland;

• Enhancements to the existing main car park off Church Road (e.g. increasing capacity, renewing surfacing, etc);

• Provision of enhanced information boards along the key walking routes, which may address the cultural / historical heritage of the CCCP and ecological interest features in the site; and

• Incorporation of Nedern Brook as a main feature into the walking routes starting at the Castle.

The strategic allocation proposed to the east of Caldicot/North of Portskewett can play an important role in facilitating new and enhanced access to public open space. The allocation includes a significant amount of new public open space, particularly to the west of the former MoD railway line. This space will directly adjoin the Country Park, providing opportunities to incorporate a range of new routes and also the potential to include enhancements such as information boards. Details of the new public open space and wider green infrastructure provision will be developed as part of any future planning application(s) for the site. This will be taken forward in consultation with the Council and other key consultees.

The HRA concludes that, provided an appropriate set of mitigation measures in and/or the wider area around the Severn Estuary SPA/Ramsar/SAC is delivered (in agreement with the NRW), the Monmouthshire RLDP will not result in adverse effects on site integrity regarding recreational pressure. We agree with this conclusion and note that various policies are included in the Deposit Plan to secure the necessary mitigation measures.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	X
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? X		Fails Test 3: Will the Plan deliver (is it likely to be effective)? X
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): Whilst we support the principle of much of the Plan, there are changes required to ensure it is sound – particularly for it to be appropriate and ensure it will deliver against the tests of soundness. The changes required for the Plan to be sound are set out in response to individual policies and paragraphs in the main body of our representations.		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

	Yes:	X

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

illustrative masterplan



Sustainable drainage with wild life and **biodiversity** benefits

Residential land proposed to deliver over 150 new **sustainable homes,** 50% affordable

Enhancements to existing **Green Infrastructure**

Recreational spaces

Community facilities(0.23Ha)

Sustainable drainage with wild life and **biodiversity** benefits

Access to employment site from **existing** infrastructure

EV charging in all car parks

Yards **shielded** from housing to reduce noise impact

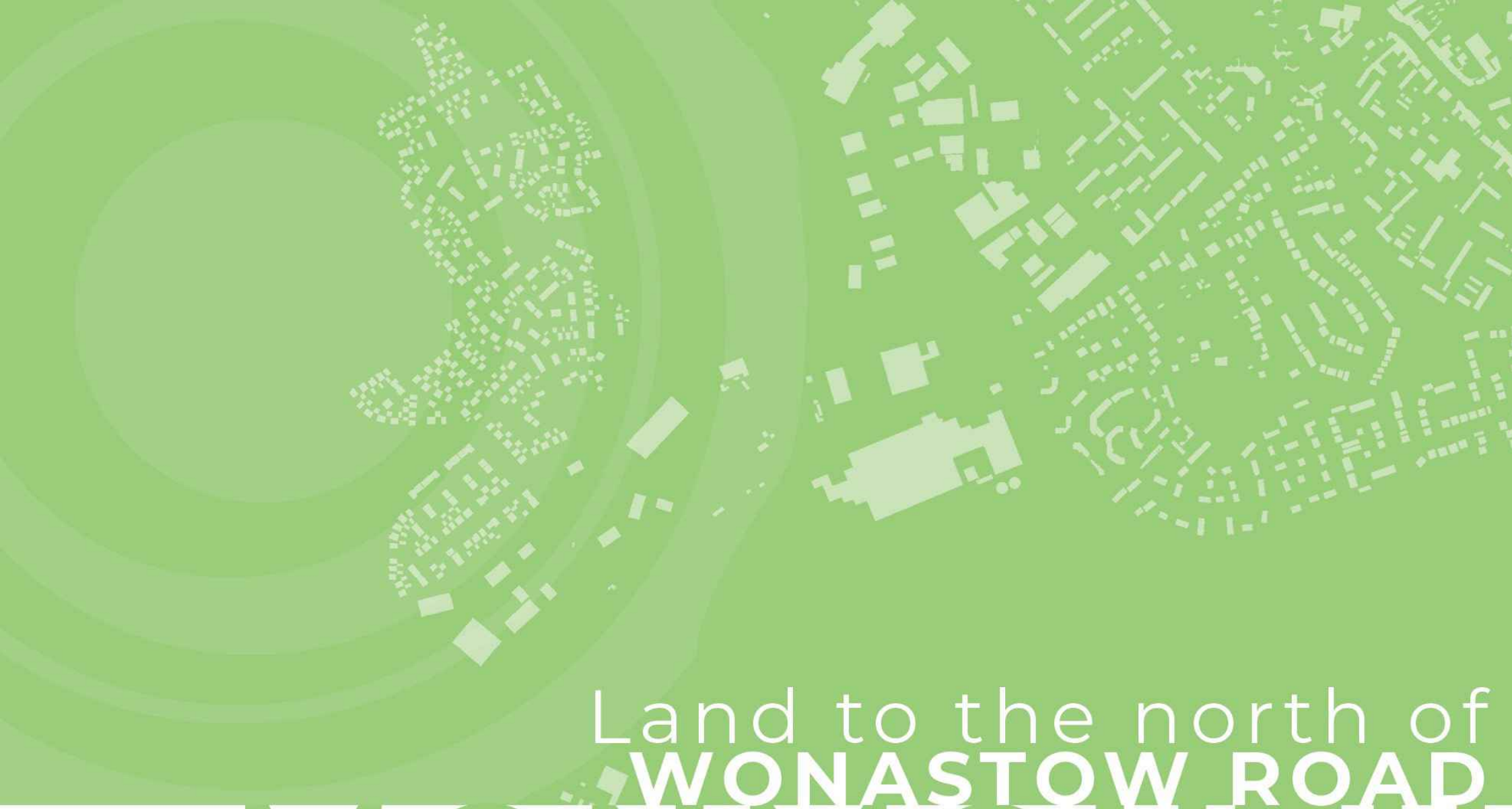
Public right of way

Green Corridor with wild life and **biodiversity** benefits

High Quality sustainable commercial buildings

Potential **access** to employment site from **existing** road infrastructure

Employment site boundary (4.5 hectares, delivering approx 125,000sq.ft GFA)



Land to the north of WONASTOW ROAD MONMOUTH

VISION DOCUMENT ADDENDUM

December 2024

Richborough

Introduction

This document serves as an addendum to the original Vision Document submitted in support of the candidate site process for a 10.97 Hectare mixed use development approximately one mile west of Monmouth town centre. This updated Vision Document provides a revised development framework, reflecting evolved proposals for the site.

The updated plan designates 6.2 hectares for residential development, accommodating approximately 150 to 175 high-quality, sustainable family homes in a mix of tenures, alongside 4.5 hectares of employment land, which could deliver approximately 125,000 sq ft GFA. Additionally, 0.23 hectares is identified for community facilities such as an agile working hub, promoting social and economic sustainability. This adjustment highlights the site's capacity to support Monmouth's economic growth while meeting pressing housing needs.

The proposed development will enhance the Monmouth community by building upon existing connectivity and transport routes while introducing cross-site connectivity to link spaces. The inclusion of new footpaths and cycle routes will tie into the existing Public Right of Way and cycle network, encouraging active travel and reduce reliance on cars.

Access to green spaces and play areas will foster a pleasant environment for residents and workers, enhancing health and well-being for both new and nearby residents. Promoting access to nature will encourage walking, jogging, cycling, and other recreational activities, creating a vibrant and active community. The development's design includes multi-functional open spaces and enhanced boundary planting to deliver a net biodiversity benefit, ensuring the area's natural environment is protected and improved.

The development aligns with the principles of social, cultural, economic, and environmental sustainability as set out in "Future Wales: The National Plan 2040." While the quantum of employment space has been increased, the key considerations, sustainability objectives, and overarching design principles remain consistent with the initial vision.

The proposals continue to align with the strategic growth direction established by the adopted Local Development Plan (LDP), offering a sustainable and integrated extension to Monmouth.

This document provides an updated framework to ensure that the mixed-use development delivers balanced growth, respects its context, and integrates harmoniously with the existing community.

Key features of the proposed development include:

Around 150 new sustainable family homes in a variety of tenures, including the potential to accomodate new specialist housing.

New children's play areas and outdoor activity facilities.

New footpaths and cycle routes integrated into the Public Rights of Way and cycle network.

Multi-functional open spaces and enhanced landscaping promote biodiversity.

4.5 hectares of employment land to support local economic growth.

0.23 hectares allocated for new community facilities / space



Constraints and Opportunities

Considering the analysis for the Site, the following constraints and opportunities should guide the masterplan layout:

Development Potential
The site provides an opportunity to continue the western expansion of Monmouth, adjacent to the Kingswood Gate residential development and Wonastow Road Industrial Estate. . It can enhance the community by providing employment opportunities, housing, and community facilities. Proposed housing would adjoin the existing residential areas to the north, with employment uses shielded to the south.

Access
Pedestrian access will be provided via footways alongside vehicular access from Ternata Drive, connecting to existing stub access points. Additional pedestrian links to Ternata Drive and Wonastow Road will ensure active travel connectivity.

Movement
A public right of way crosses the site with access points from Wonastow Road and open countryside to the west. This route will be retained and improved to promote walking and cycling. Additional recreational routes will link to the PRoW network, reducing car dependency.

Drainage
An open culvert runs through the southern part of the site, requiring an 8m offset from any development. SuDS features, such as basins and ponds, will manage surface water, enhance biodiversity, and improve water quality.

Heritage
There are no significant heritage constraints affecting development. Views towards Monmouth Castle and St Mary's Priory Church do not constitute key views. New development will align with adjacent development to the east.

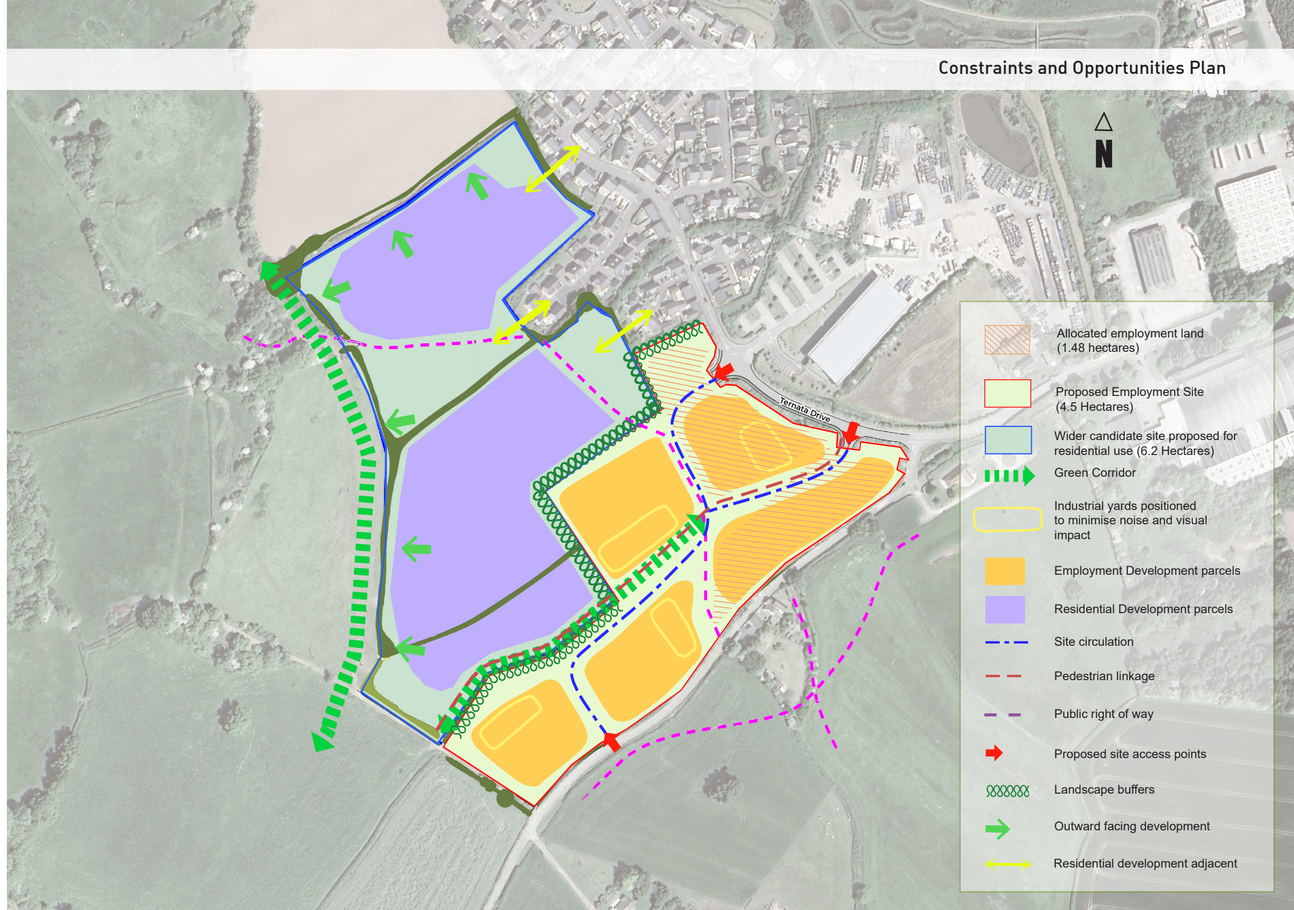
Landscape
Trees and hedgerows across the site form field boundaries and will be retained and enhanced where possible to maintain the landscape character. Native tree planting along plot frontages and roads will reflect the green infrastructure of the adjacent development. Green infrastructure will break up the built form, with informal public open space along the western edge providing a green transition to adjacent woodland. A soft development edge should be maintained to the north and west.

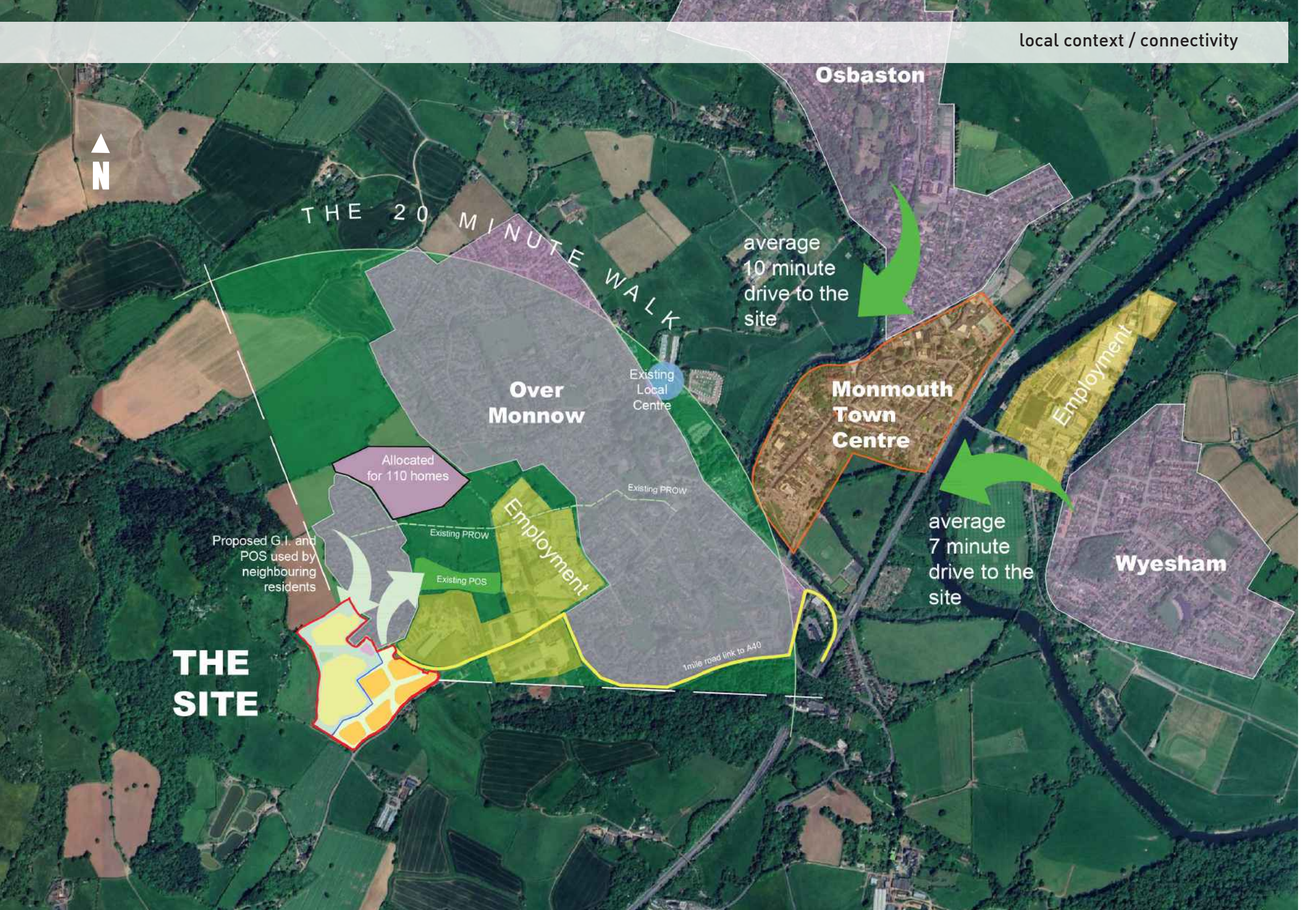
Ecology
Trees and hedgerows should be retained and enhanced with infill planting. The wet ditch running southwest to northeast offers opportunities for a linear park and biodiversity enhancements. A 10m buffer around the Site boundary will protect fauna corridors. Lighting will be minimized to preserve dark corridors for wildlife. Surveys will confirm species presence.

Topography
The Site slopes gently upward from east to west, reaching 30mAOD at the western boundary. Beyond this, the land rises steeply to Kings Wood at over 195m.



Constraints and Opportunities Plan





Local Context / Connectivity

Local Retail and Services

The pedestrian route to the town centre crosses the Monnow Bridge giving access to facilities on Monnow Street, the main town centre retail area. The area includes; convenience stores, supermarkets, pharmacies, doctors' surgery, hairdressers, cafés, takeaways, restaurants, public houses, banks, ATMs, and clothing retail stores. The Site lies within a short walk of a Spar shop and post office located on Kings Fee.

Employment

The Site is adjacent to existing local employment opportunities at Wonastow Road. The area is recognised as the primary industrial node in Monmouth and an important location in the northern half of the county. The area provides a range of engineering, storage, building suppliers, office and auto service uses.

Local Education.

Monmouth offers several options for education, including; Overmonnow Primary School, Osbaston Church in Wales School, Monmouth Comprehensive School, Monmouth School for Boys, and Monmouth School for Girls. The Stagecoach Performing Arts Cwmbran and Monmouth facility is also located in Monmouth.

Recreation

Existing footpath links are provided from the east of the Kingswood Gate development passing through wetland areas towards the areas to the east and the town centre. Monmouth provides a range of recreational facilities such as; Monmouth Town FC, Chippenham playing fields, Monmouth Castle, and Monmouth School Sports Club. Several restaurants and public houses are provided within the town centre.

Walk/Cycle

Although footways are currently absent along parts of Wonastow Road, footpath connections to the wider footway network are available, giving access towards public transport and local services in Monmouth.

The Wonastow Road 20-minute walk isochrone takes in facilities such as employment areas adjacent to the candidate site; a Spar food store; post office; Overmonnow Primary School; Stagecoach Performing Arts; health care uses; and a public house. The 20-minute walk aspiration reaches the pedestrian bridge across the River Monnow – the edge of the main shopping area within Monmouth. The National Cycle Network route 423 (NCN423) runs between Cwmbran and Ross via Monmouth. Locally, the route runs along Wonastow Road to the town centre. Public Transport. The closest bus stops to the Site are located on Link Road and Wonastow Road to the east of the Site. The stops provide access to the following services; 36, 60, and 83. The Stagecoach service 36 runs between Monmouth and Hereford, service 60 operates between Monmouth and Newport, and the number 83 service runs between Monmouth and Abergavenny. The services provide a realistic option for sustainable travel to these employment locations as well as for recreational, leisure and educational purposes within these larger towns.


Existing neighbouring employment Uses


Existing road infrastructure accessing the site


Neighbouring Residential Development

illustrative masterplan



Sustainable drainage with wild life and **biodiversity** benefits

Residential land proposed to deliver over 150 new **sustainable homes,** 50% affordable

Enhancements to existing **Green Infrastructure**

Recreational spaces

Community facilities(0.23Ha)

Sustainable drainage with wild life and **biodiversity** benefits

Access to employment site from **existing** infrastructure

EV charging in all car parks

Yards **shielded** from housing to reduce noise impact

Public right of way

Green Corridor with wild life and **biodiversity** benefits

High Quality sustainable commercial buildings

Potential **access** to employment site from **existing** road infrastructure

Employment site boundary (4.5 hectares, delivering approx 125,000sq.ft GFA)

Sustainability

Renewable Energy and Carbon Reduction

Electric Vehicle (EV) Charging Infrastructure: EV charging points will be installed in all car parks to promote the use of electric vehicles, reducing reliance on fossil fuels.

Photovoltaic (PV) Panels: Roofs of all buildings will be fitted with PV cells, enabling the generation of renewable energy on-site to meet a portion of the park's electricity needs.

Enhanced Thermal Envelopes: The buildings will incorporate high-performance insulation and enhanced airtightness measures, potentially achieving a higher level of BREEAM compliance and reducing energy consumption.

Sustainable Construction Practices

Local Labour and Materials: The project will prioritize the use of local suppliers and workforce to reduce transportation emissions and support the local economy.

Construction Management Plan:

A detailed plan will be developed to:

Minimize noise, dust, and air pollution during construction.

Reduce carbon emissions through efficient logistics and the use of low-carbon machinery.

Implement recycling and waste reduction measures on-site.

Green Infrastructure and Biodiversity

Green Infrastructure: New landscaping will include native tree planting, wildflower meadows, and hedgerows to enhance biodiversity and integrate the development into its natural surroundings.

Public Rights of Way: Existing public footpaths and rights of way will be preserved and enhanced to ensure continued community access.

Green Corridor: A green corridor will be created along the route of the existing dry culvert, providing a habitat for wildlife and supporting ecological connectivity across the site.

Long-Term Sustainability

Energy Performance Monitoring: The estate will implement systems to monitor and optimize energy usage over time.

Community Engagement: Regular communication with local stakeholders will ensure the development aligns with community expectations and delivers lasting benefits.

Ongoing Biodiversity Management: Maintenance of green spaces and biodiversity features will be prioritized to ensure their long-term success.

Noise and Visual Impact

Noise reduction strategies, such as sound barriers and operational restrictions, will protect the amenity of nearby residents.

Strategic landscaping and new green infrastructure will assist in shielding new development from view.

Landscape

Preliminary landscape and visual impact analysis has been undertaken which has concluded that, subject to sensitive design, the site has the ability to accommodate new mixed use development without having undue negative effects on the local landscape character or views from the surrounding landscape, whilst also having the ability to retain and enhance existing green infrastructure assets, provide new green and blue infrastructure features and also connect to the wider Strategic GI network and assets identified adjacent to the site within the GI SPG.

By integrating renewable energy, sustainable construction practices, and green infrastructure, the project will deliver significant economic and environmental benefits while respecting the sensitive nature of its greenbelt location.











Prepared by:

Pegasus Group
Central House,
Queen St,
Lichfield
WS13 6QD
Phone: 0121 308 9508

www.pegasusgroup.co.uk

For:

Richborough Estates Ltd
Second Floor, Waterloo House
20 Waterloo Street
Birmingham B2 5TB
Phone: 0121 633 4929

www.richboroughestates.co.uk

Land to the south of

MONMOUTH ROAD RAGLAN

SUPPLEMENTAL VISION DOCUMENT

May 2023

Richborough Estates

Introduction

This document supplements a previous Vision Document promoting land south of Monmouth Road, Raglan which was submitted in August 2021 as part of the candidate site process. Since that date, Richborough Estates has continued to positively engage with the Council through the candidate site advice service and this Supplemental Vision Document summarises how the proposal has developed and changed as a result of this ongoing engagement.

Richborough has taken account of the written advice received through the candidate site advice process, together with discussions with officers on matters such as design, landscape, drainage, ecology, heritage and active travel. This has included the start of detailed discussions with officers regarding drainage and the SAB process to ensure it is an integral part of the scheme from the outset. The document also provides further information about Richborough's approach and commitment to ensuring that the proposal is net zero ready.

Richborough has also engaged with the Headteacher of Raglan Primary School to discuss opportunities to capitalise on the site's unique proximity to the school by delivering an all-weather outdoor classroom structure together with outdoor learning and play areas within a secure site for dedicated use by the school. The Headteacher has confirmed strong support for this offering and has helped to refine this element of the masterplan proposals.

Following discussions with officers through the candidate site advice service, two masterplan options are presented within this Supplemental Vision Document. This reflects the flexibility the site offers, meaning development can be brought forward to best fit the spatial strategy and distribution of growth.

The first masterplan option is as per the original candidate site submission – a single phase development of circa 85 dwellings. The masterplan has, however, been refined to reflect discussions with the Council and Raglan Primary School. This is summarised on P.5 of this document.

The second masterplan option provides the opportunity for a smaller scale development, which could be brought forward as part of a phased approach. This option would deliver a development of circa 54 dwellings through the Replacement LDP. This would be a standalone development, but would also provide the opportunity to bring forward a second phase of development through future plans. The two phases of development would be capable of delivering approximately 100 dwellings.
This flexibility is a unique benefit of the site – offering flexibility in terms of the scale of development, which can be easily adapted to align with the final spatial distribution of growth. Importantly, under either option the core design principles and scheme benefits remain the same.

Whilst two masterplan options are presented, which would deliver c.54 or c.85 dwellings through the Replacement LDP – there is greater flexibility as to how any phased approach is designed. For example, should the Council wish to bring forward a number of new homes somewhere between the two options, this could be easily accommodated, whilst continuing to adopt the same design principles.

In summary, the land controlled by Richborough at Monmouth Road provides the opportunity to bring forward a high quality, landscape led residential development. The scheme's proximity to the school makes it uniquely placed to deliver significant benefits which will maintain the vitality of the school and the wider local community.

The scheme can be easily adapted to accommodate the level of growth considered appropriate for Raglan. This flexibility is something other sites being promoted in the settlement cannot offer. This gives the Council ultimate flexibility to ensure high quality homes come forward in Raglan, but at a scale that accords with the spatial strategy progressed through the Replacement LDP.

Critically, the scheme has been designed to retain the core design principles and wider scheme benefits regardless of the number of new homes delivered. Richborough is keen to continue to continue working with the Council through the candidate site process, with this document intended to be fluid, with the ability to be developed further as discussions with the Council and consultees continue.

Scheme Benefits

- The site immediately adjoins the existing settlement boundary and is within a comfortable **10 minute walk** or less of local facilities available in Raglan.
- Opportunity to bring forward a **mix of new homes** for first time buyers, families and those wishing to downsize, split equally between market and affordable dwellings.
- **Low density, landscape-led design** which offers extensive new green infrastructure and publicly accessible open space.
- Opportunity to deliver a new **community building, communal food growing areas and recreational walks** that join the existing public footpath network and active travel routes.
- Creation of much needed **new outdoor play and education spaces** for the use of Raglan Primary School. This space would be designed in collaboration with the school to ensure it best fits the needs of the children and teachers.
- **Sustainable urban drainage** fully integrated into new development and green infrastructure, providing opportunities for play and biodiversity enhancement.
- High quality design which considers local heritage and **reinstates a former deer park boundary**.
- Site entirely **unconstrainted by flooding from rivers and sea**. Areas of surface water flooding can be readily accommodated within new green infrastructure, resulting in betterment to the wider area.
- Site comprises Grade 3A, 3B and 4 agricultural land, which represents some of the **lower quality agricultural land** in the locality (with Grade 2 mapped around the town and an extensive area of Grade 1 identified to the west)
- A commitment to ensuring all dwellings are **net zero** ready through the incorporation of measures such as **EV charging points, air source heat pumps and photovoltaic panels** for every dwelling.
- Housing mix to include **M4(2) and M4(3)** dwellings (adaptable and wheelchair accessible housing).
- Opportunities to provide **financial contributions** to improve bus services to the village and footway/ crossing provision along Station Road.
- Flexibility to deliver a development of **approximately 85 new homes** or to be brought forward as a smaller, phased development.

Local Context Plan of Raglan

KEY:

- Site boundary
- A-road crossing points
- 20-minute walk distance
- 1 Raglan VC Primary School
- 2 Puddle Ducks Nursery
- 3 Church of St. Cadoc
- 4 Raglan Baptist Church
- 5 Community Cemetery and Memorial Bench
- 6 Football Fields
- 7 Raglan Castle
- 8 Local shop
- 9 Petrol station
- Public house
- PRoW
- Bus stop
- High Street character area
- Conservation Area Historic Designation
- Scheduled Ancient Monument Historic Designation
- Listed Building Historic Designation
- Historic Parks and Gardens Historic Designation
- Flood zone
- Flood Risk from Surface Water

Adopted Local Plan

- Identified rural secondary settlement (SAH10(iii)) for 45 dwellings.

Approved Planning Applications

- **DM/2018/00769**: Outline planning application for up to 45 dwellings. Approved 27/2/19.
- **DC/2017/00250**: Demolition of vacant school and development of a new Community Hall. Approved 2/6/17.

The Raglan **20-minute walk isochrone** takes in just about every facility available within the village. A 20-minute isochrone stretches from west of Usk Road to east of the A449 and from north of the Castle to south of Raglan Farm Shop.

The **facilities** within the village itself can all be reached in a comfortable 10-minute walk from the centre of the Site. A **community hub** will be provided on the Site, and the local **primary school** lies adjacent on the opposite side of Station Road. The **doctors' surgery** is reached via a high-quality footway connection to the north of the school, which provides a route through top the High Street via the town car park and Chepstow Road.

The village provides all of the facilities one might expect to need daily, including; **food stores, restaurants, public houses, pharmacy, takeaways, clothing stores, post office, hair and beauty salon, and places of worship.**

OPTION 1

- High quality, low density development
- Single phase comprising circa **85 dwellings**
- Landscape-led design
- Improved accessibility along Station Road
- Electric vehicle charging points
- Community building and car parking
- Nature trails and recreational routes
- Outdoor classrooms
- Children's play
- Community orchard

















- Proposed access point
- Proposed access to community facilities and emergency access
- Existing pedestrian access
- Proposed new pedestrian/cycle link
- Conservation Area
- Line of 'Lower Deer Park' Boundary
- Areas Prone to Surface Water Flooding
- Bus stops
- Long distance views
- Existing Public Right of Way to be retained
- Indicative routes
- Green visual connection
- Boundary planting to be enhanced
- Landscape buffer ensuring gradual transition to open countryside
- Proposed community orchard location
- Proposed residential development ***85 dwellings***
- Indicative location for community facilities
- Area reserved for sustainable urban drainage *(lowest part of site)*
- Proposed play space
- Outdoor classroom area
- 3m Low Pressure Gas Easement (6m Total)
- Rain gardens



Constraints & Opportunities Plan (OPTION 1)

Rain gardens along the streets

Increased landscape buffer to adjacent cemetry

Public Open Space for community use

Residential **frontage** onto Monmouth Road

New footway and **improved crossing** on Station Road for pedestrians and cyclists

Proposed **community** building

Village green with new community building and car parking area

Equipped area of **children's play**

Promotion of **sustainable transport** with new footpaths and cycle routes plugging into the existing Public Rights of Way and cycle network

Illustrative Masterplan (**OPTION 1**)



- **Development setback** to address views towards Castle
- Community **orchard**
- **Low density housing** along edges
- **Nature** trail
- Locally inspired housing designs that form a **high quality new gateway** in Raglan (buildings up to 2 storeys)
- **Green Infrastructure** and wildlife corridor
- Former **deer park boundary** reinstated
- **New foorpath** to join with retained Public Right of Way
- **Sustainable drainage** with wild life and **biodiversity** benefits
- Buildings that are **energy-efficient,** meeting the highest **sustainability standards,** with EV charging throughout
- Drainage basin forming an **amphitheatre** including a log circle for outdoor lessons and performance
- **Outdoor classroom structure** together with **outdoor learning and play areas** within the site for dedicated use by the school. Area designed to avoid being overlooked and conflicting use

OPTION 2

- High quality, low density development
- Two phase approach comprising:
  Phase 1 - **54 dwellings**
  Phase 2 - **46 dwellings**
- Landscape-led design with a central green spine
- Phased approach to the scheme
- Improved accessibility along Station Road
- Electric vehicle charging points
- Comunity building and car parking
- Nature trails and recreational routes
- Outdoor classrooms
- Children's play
- Community orchard

















- Proposed access point
- Proposed access to community facilities and emergency access
- Existing pedestrian access
- Proposed new pedestrian/cycle link
- Conservation Area
- Line of 'Lower Deer Park' Boundary
- Areas prone to Surface Water Flooding
- Bus stops
- Long distance views
- Existing Public Right of Way
- Indicative routes
- Green visual connection
- Boundary planting to be enhanced
- Landscape buffer ensuring gradual transition to open countryside
- Proposed community orchard
- Proposed residential development Phase 1 - ***54 dwellings***
- Proposed residential development Phase 2 - ***46 dwellings***
- Indicative location for community facilities
- Area reserved for sustainable urban drainage *(lowest part of site)*
- Proposed childrens' play
- Outdoor classroom area
- 3m Low Pressure Gas Easement (6m Total)
- Rain gardens



Constraints & Opportunities Plan (OPTION 2)

Rain gardens along the streets

Increased landscape buffer to adjacent cemetry

Public Open Space for community use

Residential **frontage** onto Monmouth Road

New footway and **improved crossing** on Station Road for pedestrians and cyclists

Proposed **community** building

Village green with new community building and car parking area

Equipped area of **children's play**

Promotion of **sustainable transport** with new footpaths and cycle routes plugging into the existing Public Rights of Way and cycle network



Illustrative Masterplan - Phase 1 (**OPTION 2**)

Castle Road

Station Road

Chepstow Road

Raglan VC Primary School

Raglan Surgery

Puddle Ducks Nursery

Playing Fields

0 50 100 150 200 250 m

N

10-15m **landscaped buffer** forming new eastern boundary

Development setback to address views towards Castle

Low density housing along edges

Locally inspired housing designs that form a **high quality new gateway** in Raglan (buildings up to 2 storeys)

Green Infrastructure and wildlife corridor

Retention and enhancement of **existing vegetation**

Sustainable drainage with wild life and **biodiversity** benefits

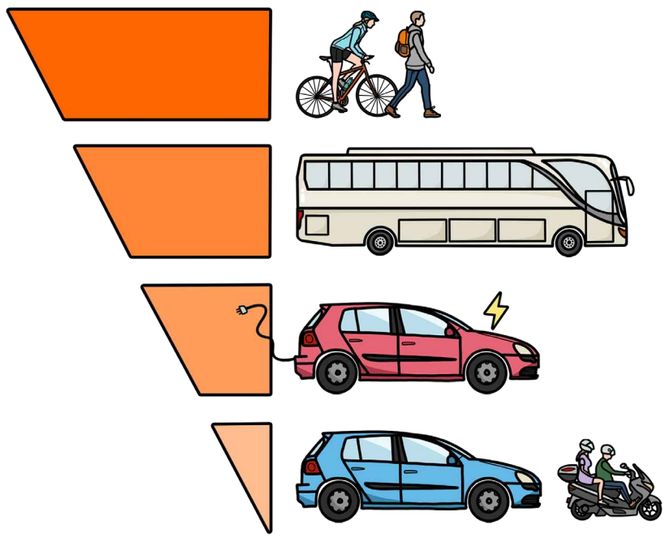
Buildings that are **energy-efficient,** meeting the highest **sustainability standards,** with EV charging throughout

Drainage basin forming an **amphitheatre** including a log circle for outdoor lessons and performance

Outdoor classroom structure together with **outdoor learning and play areas** within the site for dedicated use by the school. Area designed to avoid being overlooked and conflicting use

Active Travel Strategy

- Efficient layout to encourage and promote traffic-free walking and cycling;
- Adjacent Primary School and Nursery promotes active travel through accessible and attractive walking and cycling routes;
- Community cohesion and inclusive design through connectivity and promoting well-being;
- Design aligned with the Sustainable Travel Hierarchy;
- Potential funding to support MCC aspirations for an hourly bus service for routes 63 and 80 to improve connectivity;
- Improved footway provision along Station Road;
- Dropped kerb/tactile crossing of Monmouth Road;
- Facilities within Raglan all accessible within 10-minute walk;
- Safe cycle provision in accordance with Active Travel standards (Monmouth Road forms part of National Cycle Route 423).
- Opportunity to improve the ATNM route MCC-R054 (Monmouth Road and Station Road)



The Transport Hierarchy for Planning

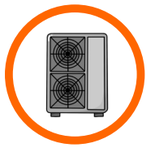




Sustainability Strategy



Electric Vehicle charging points for every dwelling with passive charging infrastructure future proofing remaining parking spaces within the curtilage of the property



Air Source Heat Pumps for every dwelling – a gasless development



Photovoltaic panels on every dwelling and designed to maximise solar gain



Enhanced fabric efficiency for every new dwelling



Maximise **use of local labour/materials** during the construction process



Minimise pollution/carbon impact throughout construction phase



Increase **local housing choice** - M4(2) and M4(3) dwellings (adaptable and wheelchair accessible housing)



Foster **strong community spirit** and promote stewardship



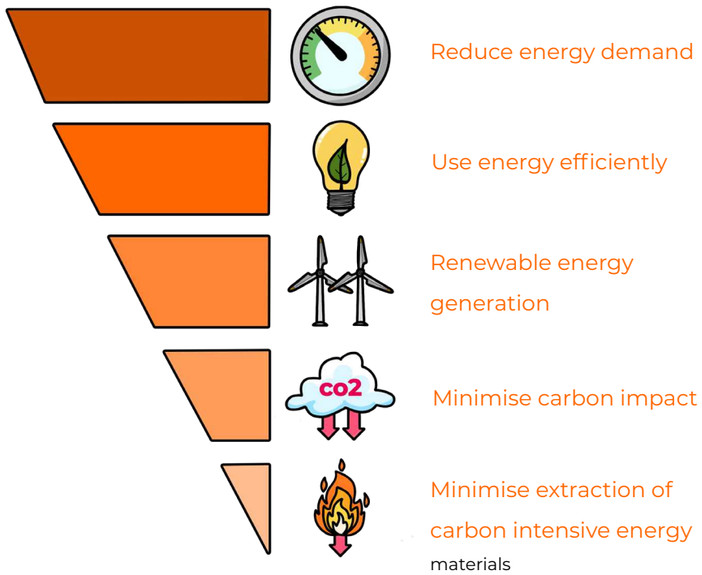
Green infrastructure - recreation, education, SuDS and communal food growing



All new dwellings to be **net zero** ready, alongside adhering to future enhancements to Building Regulations



Flood alleviation provides resilience to the local area along with **high quality SUDs** designs.



The Energy Hierarchy for Planning



Prepared by:

edge Urban Design
Suite 2, 7 Buttermarket
Thame
Oxfordshire
OX9 3EW

[redacted]

www.edgeUD.co.uk

edge Urban Design part of **edge** Placemaking Group Ltd
Company Reg No: 1147550 | VAT Reg No: 299 0720 69

For:

Richborough Estates Ltd
Second Floor, Waterloo House
20 Waterloo Street
Birmingham
B2 5TB

[redacted]

www.richboroughestates.co.uk

Company Reg No: 04773757 | VAT Reg No: 923 6721 24

1683

Llanarth Estates

Archived: 13 March 2025 10:40:44
From: [redacted]
Sent: Mon, 16 Dec 2024 08:32:13
To: MCC - PlanningPolicy
Subject: Deposit Plan Representations
Importance: High
Sensitivity: None
Attachments:
Representation Form with sheets.pdf; E24124701 - Cwm Pentref Raglan - 2024 Ecology Note_compressed.pdf;

Dear Policy Team,

On behalf of Llanarth Estate, adjoining landowners, Tirion Homes, Candleston Homes, Melin Homes and Sero Homes (together with Sero Energy and perspective commercial partners) we are please to attach our representations.

Our clients have varying interests in ensuring a robust approach to land use planning is taken. It is of utmost importance to ensure that the evidence base underlies appropriate planning interventions in order to address the problems that exist within the County and to create more sustainable and equitable communities that positively respond to the challenges that are faced.

Our clients have previously submitted proposals for a new settlement, Cwm Pentref, at the heart of the county. They have submitted significant background work demonstrating how it could be delivered and the benefits that it could bring. Our clients note the position of the Authority with regards to the level of growth proposed and that LDP's cannot allocate new settlements. Notwithstanding that, given the issues involved, they are keen to ensure that it is clear that their proposal is still a viable and deliverable option albeit for allocation in the SDP.

Our clients include land owners and farming businesses within the central areas of the County that are now more concerned than ever for the future of the rural way of life in the heartlands of Monmouthshire. They are experiencing first hand many of the challenges identified within the various evidence base documents that have been prepared for LDP review over recent years highlighting the factors impacting upon rural communities across the County. These issues include a lack of local workforce and reliance upon workers commuting in due to the unaffordability of local housing, reliance on supply chains outside of the local area, the lack of community and support services, breakdowns and inadequacies in the provision of infrastructure, the increasing cost of land management, time and expense of compliance with increased legislation, the low market prices for produce compared with cheap imports, and the need for direct sales and traceability of food (farm to table). These are all worsening as the LDP review process becomes more prolonged due to inter alia the ongoing impacts of Brexit and the combined effects of the Cost of Living Crisis, inflationary pressures and energy crisis. A continued lack of robust strategy for dealing with these matters will only worsen the sustainability of rural communities. Indeed, this would be disastrous for the County in leading towards even higher house prices, continued lack of range and choice and more restricted demographics where local people have no choice but to leave, particularly the young.

Our clients' previous representations indicate that they believe a step change is required if the County's needs are to be met and if the key challenges facing the Authority are to be addressed. In order to meet these needs and challenges, their proposals for a sustainable new settlement of the County based on zero carbon, 50% affordable housing and best practice where possible demonstrate that there remains a positive planning intervention that can be made. There is no change in the evidence base that would suggest anything other than

such an approach being required. The implications of the Deposit Plan maintaining the status quo and continuing previous trends (lack of affordability, ageing population, out commuting etc) mean that the current situation will be exacerbated and the subsequent review of the Plan will prove even more challenging.

Our clients believe that with regards to the distribution of future growth, just adding incrementally to existing settlements alone will not address the key issues faced, the lack of supply, infrastructure constraints or delivery; nor will it provide a genuine opportunity to plan for the future needs and aspirations of the County on a long term basis including new work/life practices and a shift towards healthier more active lifestyles. Similarly, a large commuter extension at Caldicott will reinforce existing patterns of growth and outmigration.

Rather, our clients remain supportive of an appropriate level of growth led by the provision of a new settlement with complimentary growth across the remainder of the Authority and still believe that it is unsound and inappropriate to remove a positive planning intervention that has the potential to deliver significant benefits. Indeed, such an approach can positively address the Well Being of Future Generations Act and create a vibrant and active community with a wide range of land uses and activities – supporting the surrounding rural area as well as stimulating and encouraging growth. Our view is only strengthened by the impacts of Covid 19 and the move towards sustainable living in local communities and working from home.

As we have stated previously, our clients do not believe that the Authority should simply accept growth at any cost. Indeed, our clients believe that a new settlement in the right location would provide an appropriate long term opportunity to move away from existing problems, constraints and issues. It could provide a step change in the approach to the future well being of the County over the current, and future, plan period. It can also provide a Europe leading approach to best practice in the delivery of communities and places. A new settlement planned with sustainability at its heart provides an opportunity to respond to the unique circumstances in Monmouthshire to set an agenda for a new, modern and sustainable way of living appropriate to its location whilst benefitting surrounding settlements. As demonstrated in our clients' supporting evidence, this sets out the aspiration to provide 50% affordable housing, allowing new residents to fill local jobs in the agricultural, care, catering and tourism industries and a major leap towards net carbon zero – it can provide the step change that the County requires which would lead the development industry nationally.

We note that adopting a lower growth scenario favoured by the Welsh Government means that the key issues can't be addressed and it will be inevitable that a new settlement (or equivalent step change) will need to be considered in a future Strategic Development Plan (SDP) in order to address the problems identified and exacerbated. Indeed, we believe that it should be eminently feasible for an LDP to "dovetail" with an SDP, and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process.

We recognise that the Local Authority is constrained with regard to the ability to allocate a new sustainable community, however, our clients would like to emphasise the fact that their proposal remains a viable option for the SDP in due course. I note that more recent ecological work has been undertaken on the site and I also attach this for your records.

Our answers to the questions posed in the consultation are set out within the attached and our response is based on a provision of options that will respond to the updated LDP objectives, the Welsh Government's placemaking objectives and Well Being goals.

Our clients are more than happy to meet with the team as in due course if you would like to discuss any aspects of the proposal.

Kind regards

[redacted]



[redacted]

T: [redacted]
www.lrmplanning.com

22 Cathedral Road, Cardiff, CF11 9LJ

REGISTERED ADDRESS: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ
DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Llanarth Estates, Melin Homes, Tirion Homes, Candleston and Sero	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not carried through to the deposit version of the Plan and are not available for the Authority to make.

1.2 Our clients consider that the overarching aims of the Plan are unobjectionable and in line with the evidence and Planning Policy Wales. Our clients' fundamental concerns however, relate to the level of disconnect between the evidence base, the issues faced and the artificially constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the tests of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 A failure to provide sufficient housing to meet the current and future needs in terms of scale and affordability will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. Monmouthshire is already one of the most unaffordable places for people to live and it has a higher proportion of outright owned larger family homes than in surrounding authority areas. Levels of need for elderly care and support are increasing and there is a lack of locally available care provision available to meet increasing need. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.4 We also raise concerns over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan alternatively the period for this plan should be extended to 2038 with additional allocations identified.

KEY ISSUES AND CHALLENGES

1.5 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP depending upon lead in times for development and viability.

1.6 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) supported a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.7 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenarios upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.8 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. For instance, the evidence base for Future Wales recognises that the broad housing figures that are suggested therein are based on past building rates which themselves are constrained due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.9 We also note that there are significant challenges facing rural businesses and communities including in respect of agriculture, forestry, tourism and care. These sectors have been particularly hard hit by trends that are impacting upon the supply of workers. Indeed, our clients are strongly of the view that greater consideration must be given to the rural economy and workforce generally and specifically the lack of affordable accommodation for those workers and a range and choice of housing for residents wishing to downsize within or close to their local communities, so they do not need to be displaced from the support structure they require. For instance, there is significant concern that many farms and/or agricultural units are becoming unviable and there is little being actively done to discourage them from diversifying or being lost;

1.10 Without a positive approach towards the future of the Authority it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts at the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of further comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";

- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted;
- our clients are of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.
- our clients believe that the Vision should include reference to the agricultural core of the County. Given uncertainties surrounding the future of farming and other rural activities (eg quarrying, forestry), lack of affordability and availability of a local workforce, there is a very realistic prospect that agriculture could be substantively gone in the Authority by 2033. Our clients own over 30 farm holdings and over 1500 ha of agricultural land in the centre of the County, each year it is more difficult to sustain such holdings when there is a lack of affordable homes for rural workers at the heart of the Authority. Commuter estates at Caldicot will not provide sustainable local housing to support businesses and residents in the rural heartland where they need it; much of rural Monmouthshire's landscape and character relies heavily on the stewardship of agricultural holdings, and the maintenance of this is time consuming and expensive with the need to pass on skills to future generations together with a wider understanding of the processes and farming methods involved in long term stewardship, protection, and enhancement of some of the County's most attractive attributes. Partnering with a not for profit society will bring forward housing to rent at below market rents ensuring key workers can access suitable accommodation locally; and
- Our clients welcome the inclusion of reference to a zero carbon County in line with Monmouthshire's declaration of a climate emergency and commitment to do all it can to help address the emergency.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives and comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasicity of supply in the housing market means that affordability

	demography and socially and economically sustainable communities.	will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places.
13	**Rural Communities** To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	Our clients are strongly of the view that a distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Indeed, it is often the smaller more remote settlements where property supply is limited and prices are highest and our clients consider that proportional growth is therefore appropriate in these locations provided appropriate infrastructure and community facilities exist to ensure the settlement is truly sustainable. However, this should not be at the expense of proposals that seek to address the much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural "way of life" ought to be the objective, as opposed to provision of large estates along the M4 corridor. Furthermore the particular difficulties faced as a result of Brexit and the lack of trade deals means that being self-sufficient and able to produce our own food is of primary importance. This is also of global importance by reducing the number of food miles some goods travel to reach market.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our clients are significantly concerned by the approach taken towards restricting growth in the Local Authority which itself has fallen by up to 30% since the 2021 Preferred Strategy Consultation and does not reflect the evidence.

1.2 Our clients are concerned that the approach taken has been entirely shaped by the Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Indeed, since we submitted previous representations on the higher growth strategy sought, the wider socio-economic circumstances have changed considerably with inflation, increases in the cost of living, energy prices etc. Adding these to the impacts of Brexit and Covid 19, our clients remain of the view that there must be a duty on every LDP to promote, encourage and foster the highest possible ambitions for achieving sustainable growth. In this regard we still believe that the approach taken to rule out a new settlement does not reflect long term planning aspirations or the specific circumstances of the County.

1.3 We are concerned that there is a significant conflict with Future Wales in the case of Monmouthshire, where the Welsh Government's position blocks a Plan-led intervention that can positively address the issues identified and hinder sustainable placemaking. The challenges facing Monmouthshire are very well acknowledged across existing policy, strategy and research documentation including the research that has shaped the previous iterations of the replacement LDP and the consideration of growth options. Indeed, it is well known that the housing market reinforces these issues and without positive interventions (i.e increasing the supply of new homes of appropriate size and tenure), there will be further worsening of matters such as the sustainability of services, the ageing population, high levels of in- and out- commuting (general lack of sustainability) and affordability. These issues have both economic and housing market implications as well as in respect of society and inequalities putting pressure on social care particularly for the isolated elderly.

1.4 Indeed, it is stated at para 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.5 These requirements shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.6 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4.

1.7 For Option 3 (4770 homes over the plan period plus a 15% flexibility allowance so 5485 in total), the evidence base indicated that this level of growth would result in inter alia:

- ***"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.8 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts would still exist:

- ***'Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.***
- ***Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."***

1.9 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- "***This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.***
- ***Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.10 It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- ***"Growth Option 1 is identified as best performing against ISA (integrated Sustainability Assessment) themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."***

SOCIO ECONOMIC CONTEXT

1.11 Hardisty Jones Associates (HJA) are widely experienced economists specialising in development needs and impacts. They were commissioned by our clients to consider the socio-economic context for Monmouthshire, specifically considering the central parts of the Authority which form the rural core. The results of their research reinforce the point that lower growth levels as envisaged would exacerbate the already significant problems experienced in the County and its rural communities and key workers.

Demographics / Age Profile

1.12 HJA note that the age profile of the central rural part of the Authority is largely an exaggerated version of that witnessed throughout Monmouthshire. It can be summarised as aged and ageing, including:

- An older population i.e. a high proportion of residents aged 65+ years, and a high proportion aged 50+ years, with shares in these age groups having increased over the last 10 years;
- A high proportion of retired residents and low proportion of households with dependent children; and
- A decrease in resident population under 50 years since 2010.

1.13 The Growth and Spatial Options Assessment previously undertaken confirms that the level of growth sought will not address these issues compared to the previous level of growth suggests it will. A higher level of growth is required in order to make a step change in this profile.

Housing Stock

1.14 The housing stock in the rural heartlands of the County is characterised by a greater proportion of larger properties. There is relatively low diversity of stock in terms of size, typology and tenure. This provides very limited choice in the market.

1.15 The share of households that own their property or privately rent is much higher than benchmark locations, and the share of homeowners that own their property outright with no mortgage is also much higher. The tenure profile exhibits a much lower share of households in social or private rented accommodation, and a very low proportion falls within affordable tenures.

1.16 A limited growth strategy will exacerbate this trend.

Affordability

1.17 Median house prices in the central part of the County are higher than other benchmark locations. This is at least partly driven by the size profile of the dwelling stock. Lower quartile house prices across the dwelling stock have consistently remained above the Monmouthshire equivalent. Average household incomes are low compared to many parts of Monmouthshire.

1.18 Housing affordability is significantly worse in Monmouthshire than Wales overall. The higher house prices and lower incomes data would suggest the local position in the heart of the County is worse than the district wide average. The housing mix is a contributor to this problem with such a high proportion of large detached and semi-detached properties and relatively few smaller properties and affordable tenures.

1.19 Housing affordability is without doubt a significant issue in Monmouthshire that must form a central component of any strategy. Accessing housing in rural areas is a challenge that extends beyond Monmouthshire, however, the County is the least affordable of all rural areas in Wales. The Local Housing Market Assessment has identified huge affordable housing need, way beyond what is deemed 'reasonable' to deliver via the Revised Local Development Plan.

1.20 Alongside the fact that policy would be unable to tackle the full extent of the challenge, sits the delivery challenge. Levels of development of both market and affordable housing over the current LDP period have fallen below targets (for a range of reasons including viability and technical constraints). In part this contributes to current need. In order to deliver the identified housing requirement and achieve ambitions around addressing the ageing demographic profile and reducing commuting levels, there is a need for an alternative level of growth which is higher than previously assessed.

Economy

1.21 Economic activity rates are generally high and would be very high if not for a substantial proportion of early retirees in the area. However, the area has experienced relatively weak employment growth, with declines in the local area prior to the Covid 19 pandemic. This is set against rising employment across wider benchmark locations and the current cost of living crisis and economic recession in the UK.

1.22 A restricted growth scenario (that retains the overall imbalanced age profile) is not going to address the fundamental problems.

1.23 From an economic perspective there is ambition to see a thriving and diverse economy. This will need to build on both inward investment and innovative, competitive indigenous businesses. This will certainly need to include developing existing rural based strengths and key sectors including tourism and leisure, food and drink and agri-tech as well as manufacturing, technology and digital activities. Farm practices will need to be future proofed to ensure they survive and the County continues its role as an important source of local produce. It needs to ensure the agricultural base is supported with key workers based locally and trained, with agriculture being recognised as an important industry essential to the health and wellbeing of local people. This is an approach advocated by the Welsh Government in their “Food for Wales, Food From Wales” document on local food production. None of these challenges can be met absent a robust and sustainable approach to planning interventions.

Commuting

1.24 There are large commuting flows both in and out of the County and the local area. Generally, essential workers (including key workers) commute into the Authority to take on important roles with more affluent workers commuting out of the Authority to urban centres such as Bristol, Cardiff and Newport. These levels have stayed broadly constant, or possibly increased, over the last 10 years despite policy ambitions to reduce these flows. The removal of tolls on the Severn crossings increased these figures as commuting costs have reduced.

1.25 These are clearly not the characteristics of a sustainable and equal place and addressing these challenges must be a key requirement of any Plan if the Council's obligations under the Well Being of Future Generations Act are to be met. Adopting a level of growth as is being suggested by Future Wales is in clear conflict with the evidence base which can only worsen this situation.

1.26 It is fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own entirely different but equally challenging issues that need to be addressed. It isn't possible to consider the whole of SE Wales as one when focusing on deprivation in previously industrial areas will not maintain the food producing heartland of the east of the region.

MEETING NEEDS

1.27 PPW12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.28 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County.
- Artificially low growth would impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. The pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable. Difficulties in sustaining services and facilities across the County will result in rural isolation.
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation.
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients strongly object to the current approach towards Spatial Strategy which does not adequately address the key challenges faced by rural communities.

1.3 We remain surprised and disappointed that perhaps the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. As we have previously commented, such an approach provides the step change required in the County. Notwithstanding this, with regards to the other potential components we note Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

Existing Infrastructure and Constraints

1.4 Many existing settlements (in all tiers and including the Strategic Sites) are subject to numerous constraints (including land assembly, landscape and nature designations such as AONB, SSSI, SAC etc) third party constraints, transport, facilities / services, foul and surface water drainage, phosphates, air quality etc.). It will therefore be vital to ensure that an adequate ownership and infrastructure plan is prepared to ensure that existing constraints are overcome with suitable levels of investment.

Distribution

1.5 Given the significant issues facing the central and northern parts of the Authority, our clients are concerned that 44% of growth is to be directed towards the M4 corridor / Severnside settlements which accommodate around 20% of the population, rather than spreading more evenly across the County in line with the other 80% of the population. This will not enable local needs to be met fully and will not address the key challenges in terms of demographics and affordability. Indeed allocating just 14% of growth to the significant number of Tier 2 and 4 settlements reinforces the existing trend of larger properties that are unaffordable for local people and key workers.

1.6 Similarly, whilst clusters have been identified for Severnside, Chepstow and Abergavenny, the strategy does not recognise the fact that there are a large number of other communities in the northern part of the County that are based around a hierarchy of hub and clusters with service centres serving a wide rural hinterland, around which sustainable patterns of movement and growth occur.

1.7 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key

issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

Sustainable development

1.8 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.9 Indeed, Creating and Sustaining communities is one of the Key Planning Principles listed in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.10 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."***

1.11 There are of course many other examples of relevant policy and Welsh Legislation requiring a sustainable approach towards development and meeting needs which we do not repeat here in the interests of brevity. However, it is clear that not addressing problems which will achieve sustainable development by balancing needs and addressing inequalities is contrary to the overarching objectives of the planning system.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.12 We are strongly of the view that a new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority.

1.13 It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

SOURCES OF SUPPLY (TABLE 2)

1.14 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as: following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply requirements are not realistic and appropriate having considered the evidence; and

- restricting the level of housing (location, range, choice and number) available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.15 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (ie between 2018/19) and 2023/24), existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principle source of sites to contribute towards the RLDP.

1.16 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward than for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.17 Such historic under delivery will have had a significant adverse effect on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.18 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.19 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.20 Given the above, we believe that 230 is highly optimist and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.21 We welcome the approach taken towards the trajectory by the Council in general. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particularly against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.22 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth.

Caldicot

1.23 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application followed by a tender and sales process further delaying delivery.
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- As noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year , such that RM's for early phases are not in a position to be submitted until 2029 and pre-commencement conditions discharged thereafter; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.24 Given the above, we note that at least **320 dwellings** that are in the current plan period will be delivered in the next period.

Abergavenny

1.25 We note the comments in the Background Paper, however, not withstanding that we submit that:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, (absent a timeframe for submission of an application), it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would not be submitted until early 2029 and pre-commencement conditions discharged subsequently; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.26 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

FLEXIBILITY ALLOWANCE

1.27 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward, the previous LDP having under delivered by 33% and as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.28 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.29 We have already set out our concerns regarding the level of growth in representations in respect of this which consider that the approach to growth should be more positive. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.30 It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 6. Do you have any comments on the climate change and renewable energy policies?

STRATEGIC POLICY S4 – CLIMATE CHANGE

1.1 Our clients support the overarching aims of the policy however, we believe that this ought to be applied to new allocations within the Plan on a site by site basis. Our clients believe that each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.

POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

1.2 Our clients are supportive of the approach taken. It is noted that their proposals for a new settlement demonstrate what is achievable, in particular a truly zero carbon community that uses the latest technology to generate and store the energy it needs as well as turn local waste into power and centralised recycling facilities and a pyrolytic plant to turn waste products into energy, reducing the net waste produced. This is possible due to the scale of the proposal and the unconstrained and significant land ownership.

1.3 They propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity at localised energy centres to power local transport, community facilities, homes and businesses. Surplus power will be exported to the national grid.

1.4 Phosphate free fertiliser as a bi product of the anaerobic digestor will be available for local farms to protect biodiversity. On plot micro power generation, such as ground and air source, solar and photovoltaic technology will be incorporated as a standard building design element alongside fast charging points, energy storage and high-performance thermal envelope.

POLICY CC1 – SUSTAINABLE DRAINAGE SYSTEMS

1.5 Our clients are supportive of the policy. It is noted that their proposed new settlement provides a nature-based solution which will secure a net biodiversity gain. Benefits will be seen at all scales from window boxes and planters, individual gardens, community allotments and orchards, to interconnecting green corridors, site wide planting and SUDs networks.

1.6 Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, linking into 125ha of new habitat within green space. New habitats will include meadow creation, wetland, woodland, hedge planting and specimen trees incorporating native plant species.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?

STRATEGIC POLICY S5 – GREEN INFRASTRUCTURE, LANDSCAPE AND NATURE RECOVERY & POLICY GI1 – GREEN INFRASTRUCTURE

1.1 Our clients are supportive of the approach taken by S5 and GI1. Their proposals for a new settlement demonstrate how green infrastructure, landscape and nature can thrive with innovative solutions, indeed, they propose creating over 125ha of new habitat and green spaces from intensively farmed land. Their approach taken seeks to ensure that their proposed community delivers an open, accessible and engaging environment. Interlinked open spaces will bind each neighbourhood together, increasing opportunities for recreation, helping and strengthen wildlife corridors and allowing people to move freely. Parkland will create a visitor destination in its own right and an important education resource.

1.2 Their proposed landscape strategy is based on six key components:

- The connection of two central but fragmented pieces of woodland. This ecological and recreational resource will be supplemented by a significant new native woodland;
- The creation of a new green spine running north-south through the residential areas, serving as an arterial route, transporting people via public bridleways, footpaths and cycleways through a mosaic of ecologically diverse habitats and connecting two fragmented stream catchments;
- The provision of two new public parks, offering individual amenity experiences at (i) Hilltop Park, with glamping and tourism and (ii) Wetland Park, based on the existing damp grassland area to the south-west;
- Four distinct neighbourhoods, based around community facilities, including communal growing spaces and play areas. These will be connected to a walkable village centre with footpaths and greenways based around existing hedges and field boundaries;
- The creation of a dedicated sports hub; and
- The creation of a patchwork of meadow and woodland, providing amenity-rich landscape, a highly sustainable and healthy wildlife resource and a dynamic rural-to urban interface where the urban environment blends seamlessly with open countryside.

1.3 In addition, and of significance their proposal is based around providing a positive contribution towards dealing with phosphates, and a mitigation strategy that ensures phosphate neutrality for the proposals but will also free up enough “credit” in order to facilitate a minimum of an additional 1,770 dwellings elsewhere in the north of the Authority, if desired. This can be increased to up to 6,000 dwellings through various measures.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY S7 AFFORDABLE HOUSING

1.1 Our clients are supportive of the aspiration to provide 50% affordable housing on allocations. In order to meet the known demographic needs of their local area, they have demonstrated on their proposals for a new community that fifty percent (50%) of housing can be affordable, including specific provision for key workers. In addition participating development partners will deliver below market rental properties. This will be a whole life community for all focused on the needs of residents including providing high quality assisted living units and care accommodation.

1.2 We have previously submitted detailed information with regards to the innovative approach our clients are taking in working with delivery partners, Tirion, Melin and Candleston in order to lead on a model for delivery. The development partners have proven track records of delivering a wide range of quality homes catering for all sectors of society. For ease I set out a summary here which helps to support the policy and demonstrate what is achievable.

Tirion Homes

1.3 Tirion is an independent not-for-profit Community Benefit Society delivering large scale mixed-tenure housing regeneration with a focus on affordable homes. They add value through innovative finance, design excellence and collaboration. They are currently delivering a portfolio of over 1500 units on regeneration sites in Cardiff, Newport and Tonyrefail. Tirion has developed an innovative long-term finance model with M&G Investments facilitating the delivery of over 50% affordable housing on their sites without any Social Housing Grant. The Tirion Model is particularly suited to large scale collaborative projects where the delivery of affordable homes improves rather than hinders viability through highly efficient finance.

1.4 At Ely Mill Tirion has also facilitated the development of a cluster of start up businesses “The Boneyard” which includes a café with pizza oven, therapy facilities, food producers, jewellery makers and crafters, a pottery workshop, furniture upcyclers and a plant emporium.

Melin Homes

1.5 Melin Homes seeks to be a dynamic organisation that works with others to make a positive difference to the people and communities they work with. They provide quality homes and services in Blaenau Gwent, Monmouthshire, Newport, Powys and Torfaen. As a registered social landlord, they work closely with local authorities and other partners to build thriving communities. Their mission is to make a positive impact on neighbourhoods by providing high-quality social housing to those who need it and pride themselves on providing an excellent service to customers.

1.6 Melin has over 4,500 units of accommodation and is on site with a large number of new homes for residents over many different locations. These houses form part of their commitment to develop 1,000 houses over 5 years. They seek to be an independent, ethical and sustainable business that delivers growth within their operating area. Their approach to growth is consistent with the business

approach to thinking longer term and being mindful of the five ways of working set out in the Well-being of Future Generations Act and the seven well-being goals set out in the Act.

1.7 Melin also hosts Y Prentis, a shared apprenticeship scheme which is jointly owned with Monmouthshire Council which was established to meet the increasing demands of socially procured goods, services and works associated with the construction industry in south-east Wales. Since its inception in 2012, Y Prentis has made a real difference in helping to train more than 300 apprentices, supporting more than 120 partners and helping to deliver in excess of 650 qualifications, making a real life positive contribution to the region.

1.8 As an organisation they continue to look forward, to meeting the challenges faced with enthusiasm, determination and imagination, and to reporting on their continuing journey to providing the highest quality homes and services to the people and communities they serve.

Candleston Homes

1.9 Candleston Limited is a wholly owned subsidiary company of Melin Homes and operates in South East Wales. It has been established to develop a reputation as a leading house builder of high-quality sustainable homes, whilst making long-term investment into communities and generating returns for Melin to further its charitable objectives.

1.10 They have delivered a number of new homes across Monmouthshire. The team are working hard on establishing a pipeline of opportunities in strategic locations and have become an essential part of the Melin Homes Group delivering new homes and augmenting the affordable homes provision across the region in which Melin operates.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 13. Do you have any comments on the visitor economy policies?

STRATEGIC POLICY S12 – VISITOR ECONOMY

1.1 Our clients note the significant role that the visitor economy plays in Monmouthshire and in particular its importance to the tourism economy. In addition to supporting local business, there is a need to contribute to the broader needs of the local and national economy. Tourism is of significant value to Monmouthshire, with 2017 statistics showing an influx of 2.24m visitors to Monmouthshire, which provided a £219m boost to the economy with 2,989 jobs supported by the sector. (Visit Monmouthshire, www.visitmonmouthshire.com/ tourism-business-support.aspx), Tourism Performance (2017). Cycling alone is a major contributor to the Welsh tourist industry. Visit Monmouthshire explains that "According to the 2015 Great Britain Tourism Survey, cycling is worth £90 million to the Welsh economy through daily visits and stays. Around 300,000 overnight visits to Wales each year involve cycling and/or mountain biking with an annual worth between £55 and £60 million." (Ibid)

1.2 Within their proposed new community, there are opportunities to connect areas of cultural heritage, education, camping and sports facilities to provide a healthy environment for both residents and visitors alike. There is huge potential, therefore, to take advantage of this burgeoning industry, develop existing facilities and make an even greater contribution through additional connectivity. There are also proposals for an equestrian centre which will be combined with substantial investment in public bridleways to provide a well-integrated set of facilities for horsemanship and exercise.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 14. Do you have any comments on the sustainable transport policies?

STRATEGIC POLICY S13 – SUSTAINABLE TRANSPORT

1.1 Our clients are supportive of the approach taken towards sustainable transport. It is noted that the policy includes reference to enabling solutions to rural transport issues. Our clients are well aware of the problems faced by rural communities and would like to draw the Council's attention to the benefits that an unconstrained new sustainable settlement could bring.

1.2 Indeed, in their proposals active travel, health and wellbeing, and mobility for all will be the key guiding principles in developing travel plans and sustainable travel choices for their new settlement. It includes a number of innovative solutions towards rural accessibility issues. Cwm Pentref will cater for all the needs of its residents so that they do not need to make distant journeys for basic needs and services.

1.3 It will establish a sustainable transport hierarchy that prioritises public transport, riding, walking and cycling over the use of the car with most facilities within walking distance. As a consequence the following measures are proposed:

Electric shuttle bus & Transport hub

1.4 Located just off the A40 a transport hub is proposed to connect residents, businesses and tourists to the surrounding major cities, towns and villages. An electric bus service operating from the hub would circulate within the site and provide internal connections to local train stations, local centres, school etc. In connection with a number of proposed car-free zones, this service would help ensure that all parts of the development can be easily accessed without having to revert to car travel. The hub would also provide cycle parking and connections onto a site wide footpath and cycle network.

1.5 Bus services operating from the hub would circulate within the site and allow onward bus connections to be made from the hub to Abergavenny, Raglan, Monmouth and Newport. The bus service to Abergavenny would be synchronised with the rail timetable and connect to the King Henry VIII secondary school.

Self contained and sustainable internal movements

1.6 It is proposed that within the development specific areas will be car free and the surrounding neighbourhoods will be within easy walking or cycling distance along a network of cycle and walking routes which have been planned to link all areas within the scheme and local points of interest (Raglan Castle and village, garden centres and local pus and restaurants as well as the nearby gliding centre).

1.7 An interconnected network of over 18km of footpaths and cycleways will provide a safe, off road, choice of routes through the development including safe walks to schools.

1.8 High quality bike storage will be located at strategic points such as the transport hub and local centres to encourage residents to use sustainable transport methods. Routes have been linked to the existing Public Rights of Way (PRoW) crossing the site to allow wider access to the network including National Cycle Routes and an existing National Trail. Footpath and cycle connections between the site and Raglan to the south east will be assessed and improvements explored. Furthermore opportunities will be explored in consultation with Sustrans to extend the network.

1.9 All dwellings will have their own covered cycle storage and sufficient cycle storage will be located at areas of general assembly (local centres, schools etc) and at all the nondomestic buildings.

1.10 The car free areas will be supported by nearby parking generally within 50m of a dwelling. The theme will be walkable neighbourhoods with facilities within 800m. Bus services within the development will be within 300m (max 400m).

EV priority

1.11 Electric Vehicle (EV) charging points will be provided to a substantial number of car parking spaces. These charging points could be connected to PV panels, battery storage and/ or other forms of renewable energy generated across the site (such as the CHP plant in the energy centre).

1.12 For on plot parking private carports will be preferred over garages and the carport roofs can be used for PV (Flexi-solar or similar).

1.13 Over and above walking and cycling, electric car charging and public transport, it is envisaged that a Car Club would be set up with spaces provided at convenient pick up locations throughout the development. In addition, on site infrastructure would be designed to enable future use by connected autonomous vehicles (CAVs).

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 16. Do you have any comments on the community infrastructure and open space polices?

STRATEGIC POLICY S15 – COMMUNITY AND RECREATION FACILITIES

1.1 We are supportive of the approach towards community facilities and recreation,

1.2 Our clients proposal for a new community demonstrate how master planning can deliver sustainable places based around community facilities. Central to their proposal for instance, localised neighbourhood centres will provide access to a wide variety of facilities including shops, business support, schools, health and social care facilities. These centres will be car free places linked to the bus and cycle network. Outdoor market spaces, and communal open areas will encourage farm enterprise and community cohesion.

1.3 Onsite energy centres will distribute locally generated power to the neighbourhood. They will incorporate site management offices and space for the emergency services. Additionally a repair workshop and upcycling centre with tool and equipment hire will be available alongside digital hubs to manage fibre to home connectivity and conferencing infrastructure providing technology support for home working.

1.4 The proposals also seek to create a network of Community Hubs, focused on local energy centres linked by the site's electric bus route and cycle network. These hubs will provide flexible co-working spaces, community rooms for meetings, training, events and classes (such as yoga, brownies, antenatal classes), recycling centres, postal distribution and collection centres, cafes, and space for faith groups to meet. Attached to each hub, a group of almshouses for the elderly and a children's day nursery seek to ensure that different generations can integrate and support one another.

POLICY CI2 – PROVISION OF FORMAL AND INFORMAL OPEN SPACE AND ALLOTMENTS / COMMUNITY GROWING AREAS

1.5 Our clients are supportive of measures that aid the local production of food. Indeed, this is an important component of their approach to their proposed new settlement, which seeks to champion local growers and producers both on and off site. From locally reared meat and dairy, to baked goods and honey, and fruit and vegetables. Their proposals will provide the infrastructure necessary to deliver fresh goods from local farm to the table, (as well as a phosphate free fertiliser as a bi product of the energy centre).

1.6 A new community farm with market garden is proposed, supplying veg boxes to low income residents. Allotments and community gardens, orchards and a 'food forest' will be woven through the development. The neighbourhood centres will cater for regular farmers markets and pop ups.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 17. Do you have any comments on the mineral and waste policies?

STRATEGIC POLICY S17 – SUSTAINABLE WASTE MANAGEMENT

1.1 Our clients are of the view that sustainable waste management ought to be promoted and they are supportive of the requirements. However, it ought to be noted that waste is not limited to commercial and household waste, some of which is not currently suitable for standard recycling processes. Rather there is a significant amount of agricultural waste across the Authority. There should be innovative means of dealing with this, for instance our clients proposed Anaerobic Digestion plant will take farm waste from across their landholding and the wider County to generate gas. The bi product will provide a phosphate and nitrate free fertiliser that can be used on local farms and has the potential to remove a major source of pollution (phosphates) from the local eco system and river catchments.

1.2 In addition, our clients proposed waste to energy gasification plant, which will use predominantly waste plastics (that cannot be recycled) along with some biomass to convert waste into a bio-gas. Such a facility could be located within the employment area alongside and indiscernible from other small factory type units with limited impact. In the case of our clients' proposal, the gasification plants would be converted at localised energy centres into heat and power. The heat will feed into a District Heating System in the village centre to support community facilities and higher density accommodation for the elderly and vulnerable whilst surplus can be converted to electricity to feed into the grid or directly to nearby homes.

1.3 Such a sustainable, net carbon zero approach to energy needs (including in respect of charging points for cars, bikes and shuttle buses) provides a unique opportunity for the County.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		x
Fails Test 3: Will the Plan deliver (is it likely to be effective)?		x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

Question 3 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE



SEPTEMBER 2024

soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone: - 033 00 13 00 12
e-mail: - enquiry@soltysbrewster.co.uk
Web Site: - www.soltysbrewster.com

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE

DOCUMENT REF: E24124701/Doc 07 – September 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	17th Sept. 2024	[redacted]		

ECOLOGY SUMMARY NOTE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

Background

Soltys Brewster Ecology (SBE) were commissioned by Llanarth Estate to undertake an ecological walkover survey of an area of land at Raglan, Monmouthshire (central grid reference: SO404092, see Site Location Plan in Appendix I). The area, which encompasses agricultural farmland with associated hedgerow, treeline and woodland boundaries, has been proposed as a strategic candidate site for residential development as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP) review process. An initial baseline survey was completed at the site by SBE in 2019[1], with an updated Preliminary Ecological Appraisal undertaken again by SBE in 2021[2], following changes to the site's redline boundaries. The results of these surveys are now considered 'out of date' and so in order to establish if there had been any notable changes to site conditions (i.e. type and distribution of habitats), an updated walkover survey was undertaken in August 2024 to inform the current promotion.

2021 Survey Work

The 2021 survey visit (SBE) revealed limited range of habitats at the candidate site, in line with its agricultural use, with conditions largely consistent with the findings of the 2019 survey (see 2021 Extended Phase 1 Habitat Plan in Appendix II). The majority of the site consisted of arable and improved grassland fields which were considered of low ecological importance. Other habitats present included poor semi-improved grassland, plantation woodland, scattered trees and scrub, continuous bracken, hedgerows, ponds, swamp, ditches and buildings – of which hedgerows, ponds and swamp were all identified as Section 7 Priority Habitat under the Environment (Wales) Act 2016.

The habitats present at and directly adjacent to the site were considered likely to support locally foraging/commuting bat species, nesting birds (including ground-nesting birds), Badger *Meles meles* and amphibians, potentially including Great Crested Newt *Triturus cristatus*. The habitats also had limited potential to support Hazel Dormouse *Muscardinus avellanarius* and common reptiles, while the survey identified several trees and buildings at the site with potential to support roosting bats. No invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded at the site.

[1] Soltys Brewster Ecology (SBE) (2019). *Land at Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885901/DOC 02 – 30 July 2019.

[2] Soltys Brewster Ecology (SBE) (2021). *Cwm Pentref, Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885902/DOC 01 – 24 August 2021.

A desk study completed as part of the 2021 Preliminary Ecological Appraisal confirmed that the candidate site does not lie within or adjacent to any internationally or nationally designated sites for nature conservation, and neither can any such site be found within a 1.5km radius. Several locally designated Sites of Importance for Nature Conservation (SINCs) were identified in the local area, none of which would be impacted by the proposal based on their physical separation from the site (the nearest SINC was found approximately 400m to the northwest). The data search did reveal that the candidate site contains one parcel of Ancient Semi-natural Woodland (ASNW) and three parcels of Plantation of an Ancient Woodland Site (PAWS), associated with Chapel Wood and Pentwyn Wood. A copy of the 2021 desk study information received from South East Wales Biodiversity Records Centre (SEWBReC) is included within Appendix III.

2024 Walkover Survey

The updated site walkover survey was undertaken on the 15th of August 2024 by a suitably qualified ecologist[3]. Overall, conditions across the candidate site have remained broadly consistent with what was mapped/recorded in 2021, and as such the 2021 Phase 1 Habitat Map (see Appendix II) is still considered to be representative of the site. Site notes taken during the 2024 walkover survey, along with accompanying photos and an annotated map, are included within Appendix IV.

Habitats

The majority of the candidate site remains occupied by a series of arable or improved grassland (mostly Ryegrass leys grown for hay/silage with some sheep pastures in the west) field parcels which were considered to hold limited ecological value and continue to represent the most suited areas for any future development. Other habitats recorded at and immediately adjacent to the site include parcels of plantation woodland, scattered trees and scrub, hedgerows, ponds, swamp, ditches and buildings – all of which are as described in 2021. These habitats, which are mostly associated with the field boundaries/margins, were considered to represent more important ecological features (in context of the site), with hedgerows, ponds and swamp all still listed as S7 Priority Habitats in Wales. The only notable changes since the 2021 survey visit related to some minor changes in land-use practices/management within several of the agricultural fields – these changes are set out in Table 1 below.

[3] Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of habitat and protected species surveys and previous knowledge of the candidate site.

Table 1 – Changes to land use/management in field parcels

Field No.	Changes to habitat/use
F6	Previously Arable – now sown with improved grassland.
F7	Previously poor semi-improved grassland – appears to have recently been sown with improved grassland (Ryegrass ley grown for hay/silage).
F11	Previously unmanaged/dis-used land parcel covered entirely in continuous Bracken – The field is still unmanaged with the Bracken now being replaced by successional scrub comprising Bramble with young strands of Willow *Salix sp*. and Birch *Betula sp*.
F16	Previously improved grassland – now used as Arable.
F19	Previously improved grassland – now used as Arable.

The various buildings found at across the site (i.e. those associated with Wern-Y-Cwrt Farm in the west, or the barn found in the far east) also remain in similar appearance to what was recorded in 2021, with no notable changes to their current use or condition – see Target Notes 1 & 6 in Appendix IV.

No invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were found at the site during the walkover survey. However, Cherry Laurel was noted within one of the woodland parcels in the northern extent of the site (see Target Note 12). While this species is currently not listed on Schedule 9, it is considered particularly invasive and can spread rapidly in woodland environments if left unmanaged.

Protected Species

As the type and extent of habitats across the site have remained consistent with what was recorded during the 2021 survey visit, so does the site's potential to support protected or priority listed species (as discussed in paragraphs 3.37 – 3.50 of the 2021 PEA report). The parcels of woodland, hedgerows and treelines continue to represent good quality habitat for a range of tree/shrub nesting birds and foraging/commuting bats, with the open fields likely support ground-nesting bird species such as Skylark *Alauda Arvensis* – which were observed at the candidate site during the 2019 survey. Several ponds found at and adjacent to the site were also considered to have a low potential to support Great Crested Newt (with this species known to inhabit the local area), while the habitats were also considered to have low potential of supporting Hazel Dormouse and populations of common reptile.

The updated survey confirmed that all of the trees previously (2021) identified as holding potential to support roosting bats are still present and remain in similar condition. This included 2no. trees with high

potential and 14no. trees with moderate potential. Under the current best practice guidelines[4], any trees assessed to hold moderate/high potential (PRF-M) would require further survey work if these were to be felled, as outlined in section 5.4 of the 2021 PEA report. A disused barn within Field 5 was assessed to have a low potential to support roosting bats and so would also require further survey work (for roosting bats) if this was to be demolished or converted/refurbished as part of the development (as outlined in section 5.4 of the 2021 PEA report).

[redacted]

[4] Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition). Bat Conservation Trust, London

[5] Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*: Developing Best Practice in Survey and Reporting. IEEM, Winchester.

Table 3 – Disturbance risks and protection zones for Barn Owl, adapted from Shawyer (2011).

Activity Type	Example	Disturbance risk (displacement from nest)	Min protection zone	Disturbance risk (displacement from nest)	Min protection zone
		Continuous activity		*Occasional activity*	
Pedestrian Movement	Construction workers walking near nest	Low/Medium	20 m	Low	10 m
Artificial lighting	Arc lights illuminating works but (not directed toward the nest)	Low/Medium	30 m	Low	20 m
Vehicular movement	Vehicles or heavy plant moving past the nest	Medium	40 m	Low	30 m
General building and landscape works	Laying of concrete, bricks, roofing using mechanised plant	Medium/High	60 m	Medium	40 m
Heavy construction works	Ground levelling, piledriving, concrete crushing etc. using heavy plant	High	175 m	High	150 m

Conclusions & Recommendations

As conditions at the site have remained largely unchanged, many of the conclusions and recommendations set out in the 2021 Preliminary Ecological Appraisal also continue to remain appropriate for any future development at the candidate site. In order to inform a planning submission, further survey work may be required for bats, Great Crested Newt and Hazel Dormice (dependant on any future site layout plans). There are also several precautionary measures that would also be appropriate during the clearance/construction/operational phases of any future development in order to safeguard wildlife and other features of ecological value at the site. As previously mentioned, hedgerows, ponds and swamp are all listed as S7 priority habitats, and so any loss of these habitats would therefore require some compensation measures, which could entail new habitat provision or the positive management of retained areas of vegetation.

[redacted]

[redacted]ield parcels 3 and 4, as well as the northern extent of field parcel 2, in the eastern extent of the site could be excluded from any future development, with these areas left as open grassland as part of the site's POS or Green Infrastructure (GI) network. These fields could be left as a 'mitigation zone/biodiversity protection area' and enhanced with the arable crops replaced with a species-rich wildflower meadow mix in order to provide habitat resources for a wide range of wildlife. Doing so would also contribute to the scheme achieving a net gain in biodiversity units.

Therefore in accordance with the current LDP and Planning Policy Wales (PPW 12), any development at the candidate site will need to adhere to the avoidance, mitigation and compensation hierarchy. Appropriate avoidance, mitigation and enhancements measures for the site (as set out in the 2021 PEA) are summarised below:

Avoidance

- Any future vegetation clearance at the candidate site i.e. tree/scrub removal to be undertaken outside of the nesting bird season (clearance possible between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.
- Retention of the site's boundary features and field margins as part of the site's Green Infrastructure (GI) network.
- Retention and protection of all Ancient Semi-natural Woodland (ASNW) and Plantation of Ancient Woodland Sites (PAWS) with appropriate buffers separating these from development.
- Retention of any S7 priority listed habitats (i.e. ponds, swamp and boundary hedgerows) as far as practical.
- Retention of any trees considered suitable of supporting roosting bats.
- [redacted]

Mitigation

- Any loss of S7 priority listed habitats to be compensated for through a combination of compensatory measures which could include new species-rich grassland/hedgerow/scrub

planting, new pond creation and retaining parcels of grassland around the site with these managed as wildflower meadows to maintain resources for pollinators/invertebrates.

- Appropriate mitigation for the loss of ground-nesting bird habitat at the site – e.g. retention of field parcels at or adjacent to the site as arable/open grassland, with 'Skylark plots' provided in these fields. [redacted]
- Design of site lighting to minimise artificial light spill onto boundary features and woodland parcels to limit impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 0.5 lux.
- Covering of any excavations overnight or means of escape provided during the construction phase to minimise risks to any wildlife that may become trapped.
- Dependant on likely impacts of any future development layout (e.g. requirement for hedgerow or woodland breaches/loss), further survey work to be completed for bats (transects and automated surveys), Hazel Dormice and Great Crested Newt to inform specific licensing and mitigation requirements with regards to the proposed development layout.
- Precautionary approach to any clearance of fringe vegetation/hedgerows at the candidate site to safeguard reptiles and common amphibians.
- Creation of 130mm x 130mm gaps at the bottom of any garden/boundary fencing to allow continued connectivity through the candidate site for Hedgehog and other small mammals[6].

Enhancement

- Eradication of Cherry Laurel from the woodland parcels.
- Strengthening of any defunct hedgerow boundaries and/or damaged hedgerow sections with new native scrub/tree planting.
- Provision of bat/bird/insect boxes on retained trees and new buildings.
- Provision of rock/log piles along retained boundary hedgerows and woodland edges for use by common herpetofauna.
- Provision of hedgehog houses/homes within retained woodland parcels.
- Design of any SuDS features to benefit biodiversity.
- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity.

[6] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

- Implement management plan for retained and newly created habitats to maintain and enhance their value to local biodiversity.

APPENDIX I SITE LOCATION PLAN

LAND PROMOTION AGREEMENT MAY 2021

North

SCALE 1:6000 @ A3

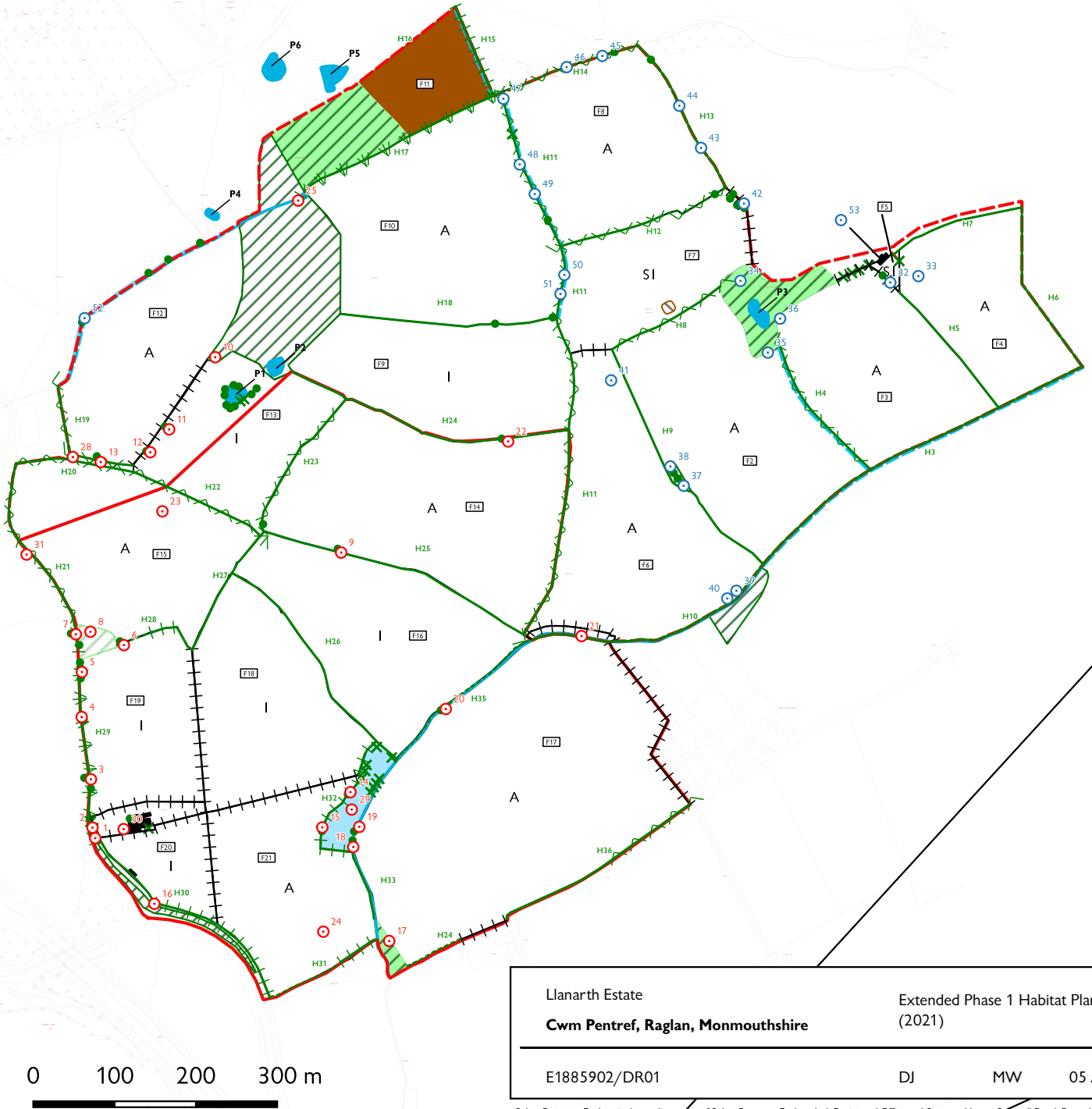
100 m 0 600 m
1: 6,000

PROMOTERS LAND

FIRST OWNERS LAND

SECOND OWNERS LAND

APPENDIX II 2021 EXTENDED PHASE 1 HABITAT PLAN



Key

- Site Boundary/ Survey Area 2019
- Site Boundary/ Survey Area 2021
- A1.1.2 Broad-leaved Plantation Woodland
- A1.2.2 Coniferous Plantation Woodland
- A1.3.2 Mixed Plantation Woodland
- A2.1 Dense/Continuous Scrub
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- B4 Improved Grassland
- B6 Poor Semi-improved Grassland
- C1.1 Continuous Bracken
- C3.1 Tall Ruderal
- F1 Swamp
- F2.1 Marginal Vegetation
- G1 Standing Water
- G2 Running Water
- J1.1 Arable
- J2.1.1 Intact Species-rich Hedgerow
- J2.2.1 Defunct Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- J2.4 Fence
- J2.5 Wall
- J2.6 Dry-ditch
- J3.6 Buildings
- Target Notes 2019
- Target Notes 2021

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Llanarth Estate

Cwm Pentref, Raglan, Monmouthshire

Extended Phase 1 Habitat Plan (2021)

E1885902/DR01 DJ MW 05 August 2021

soltysbrewster ECOLOGY

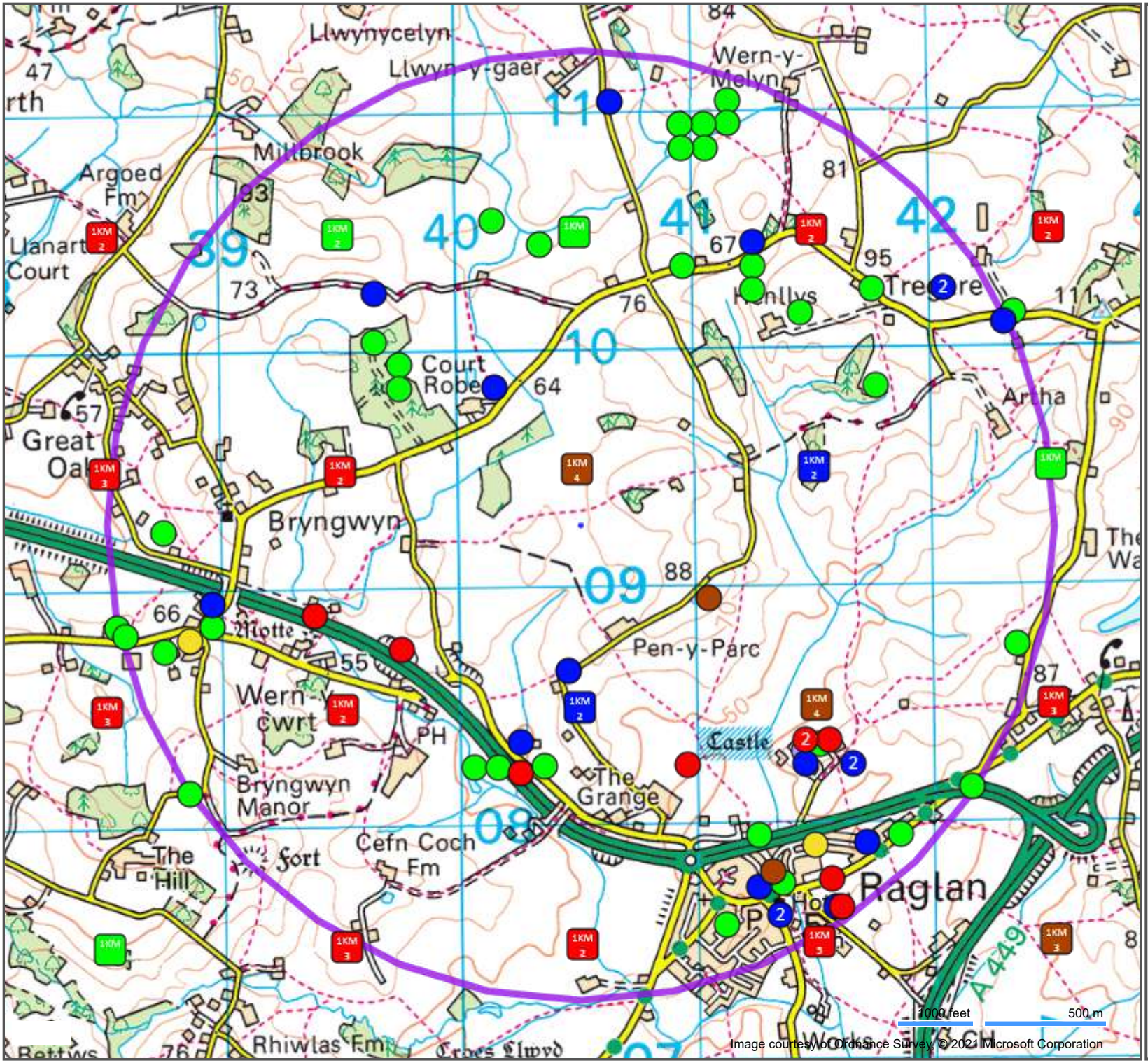
4 Stangate House
Stanwell Road
Penarth
Vale of Glamorgan
CF64 2AA

Tel: 033 00 13 00 12

Email: enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX III DESK STUDY INFORMATION RECEIVED FROM SEWBREC (2021)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CofnodionAmgylcheddol Lleol CYMRU

eMapper for LERC Wales Aderyn Commercial

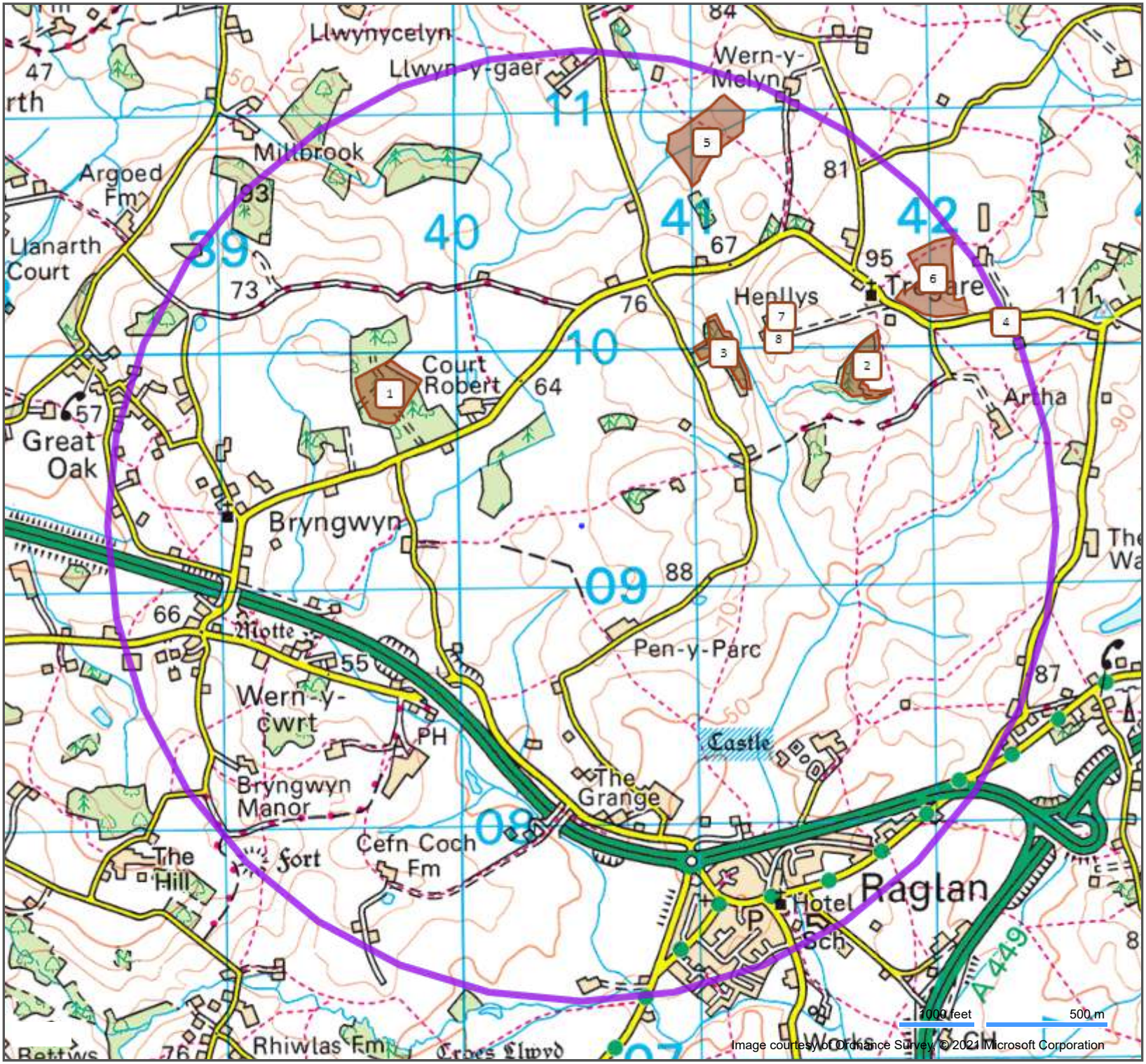
ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf Species Map (Public)

Key

- Search Location
- Search Buffer (2000m)

- **Bees, Wasps, Ants and Sawflies**
- **Birds**
- **Butterflies and Moths**
- **Mammals**
- **Other Invertebrates**
- **Plants**
- **Reptiles and Amphibians**



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDONIAMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

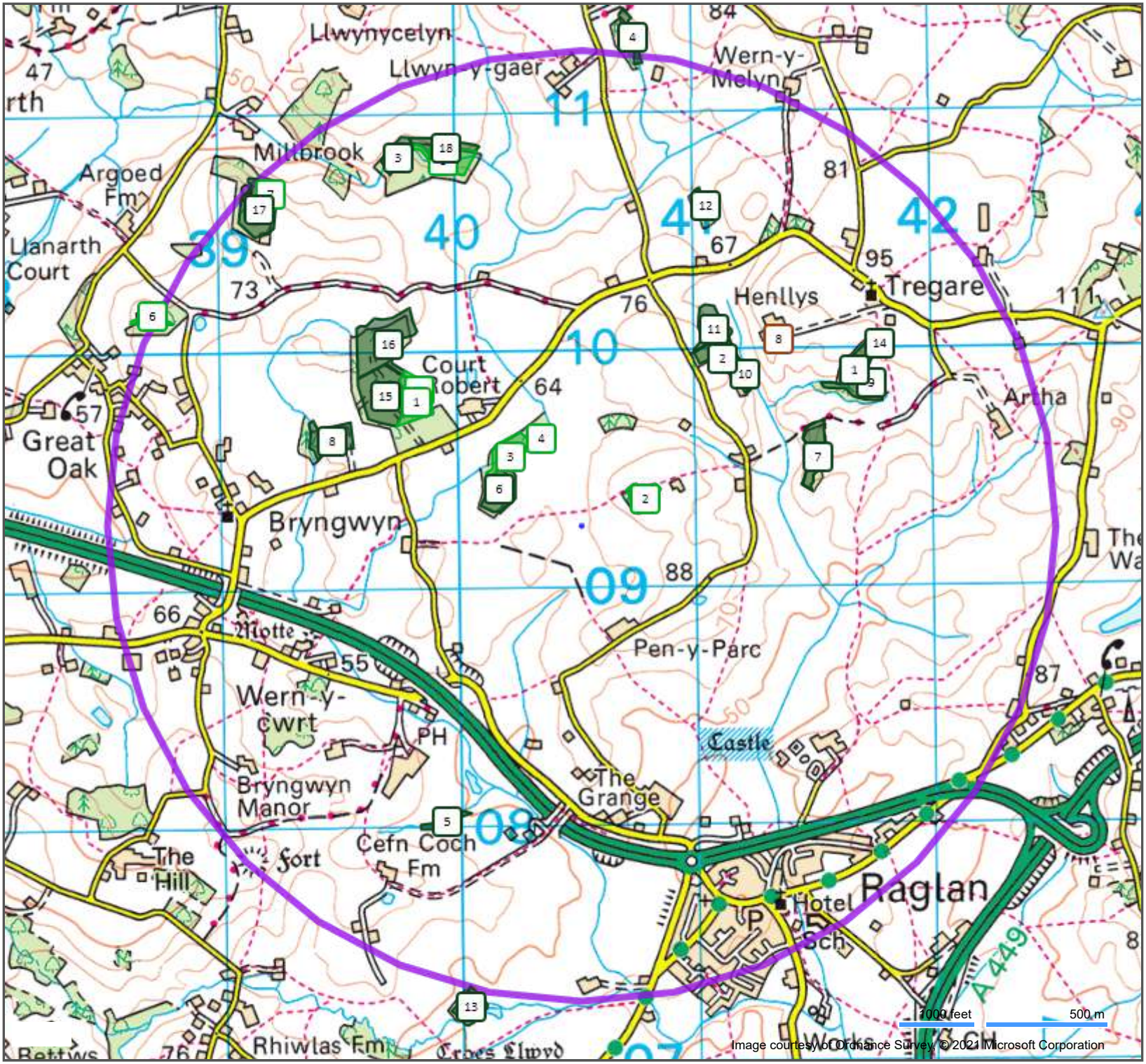
Cwm Pentraf Sites Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Adopted SINC

1. **1**: Coed Robert
2. **2**: Fforest Coed
3. **3**: Henllys Wood
4. **4**: Pen-Y-Walk Meadow
5. **5**: Wern Mellin
6. **6**: Parc-Y-Dert
7. **7**: Henllys Farm (Garden Orchard)
8. **8**: Henllys Farm (Main Orchard)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDIDIN AMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf ASNW Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Ancient Semi-natural Woodland

- **1**: Ancient Semi Natural Woodland
- **2**: Ancient Semi Natural Woodland
- **3**: Ancient Semi Natural Woodland
- **4**: Ancient Semi Natural Woodland
- **5**: Ancient Semi Natural Woodland
- **6**: Ancient Semi Natural Woodland
- **7**: Ancient Semi Natural Woodland
- **8**: Ancient Semi Natural Woodland
- **9**: Ancient Semi Natural Woodland
- **10**: Ancient Semi Natural Woodland
- **11**: Ancient Semi Natural Woodland
- **12**: Ancient Semi Natural Woodland
- **13**: Ancient Semi Natural Woodland
- **14**: Ancient Semi Natural Woodland
- **15**: Restored Ancient Woodland Site
- **16**: Restored Ancient Woodland Site
- **17**: Restored Ancient Woodland Site
- **18**: Restored Ancient Woodland Site

Plantation on Ancient Woodland Site

- **1**: Plantation on Ancient Woodland Site
- **2**: Plantation on Ancient Woodland Site
- **3**: Plantation on Ancient Woodland Site
- **4**: Plantation on Ancient Woodland Site
- **5**: Plantation on Ancient Woodland Site
- **6**: Plantation on Ancient Woodland Site
- **7**: Plantation on Ancient Woodland Site
- **8**: Plantation on Ancient Woodland Site

Adopted SINC

- **8**: Henllys Farm (Main Orchard)

APPENDIX IV 2024 SITE NOTES & ANNOTATED PLAN

Target Note	Description/Comment
***Birds seen/ heard**: House Sparrow Passer domesticus, Buzzard Buteo buteo, Barn Owl Tyto alba, Tawny Owl Strix Aluco, Great Tit Parus major, Pheasant Phasianus Colchicus, Red Kite Milvus milvus, Swallow Hirundo rustica, Herring Gull Larus Argentatus, Wood Pigeon Columba Palumbus, Carrion Crow Corvus Corone, Collared Dove Streptopelia decaocto and Wren Troglodytes troglodytes.* ***Other:** Roe Deer Capreolus capreolus and Speckled Wood Pararge aegeria & Large White Pieris brassicae butterflies.*	
Habitats	
1	Renevated bungalow at Wern-Y-Cwrt Farm. Building is in good condition with new roof and render – negligible roosting potental (previous TN30 in 2021 PEA report). Adjacent barn also considered unsuitable for roosting bats (no obvious features and very open/exposed inside), although Swallow are nesting within this structure. 
2	Area previously mapped as a swamp, surrounded by lines of broadleaved trees, hedgerows and dense scrub (previous TN29 in 2021 PEA report). This was found to be dry at the time of the current survey and contained ruderal species such as Hemlock Water-dropwort *Oenanthe crocata*, Common Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium* and Cow Parsnip *Anthriscus sylvestris*. Hedge Bindweed *Calystegia sepium* is also widespread. Several of the mature trees bordering this swamp have potential to support roosting bats.

	
3	Tree with roosting bat potential (see Target Note 20 in 2021 PEA). This tree was previously considered to hold moderate potential although its condition has since deteriated and now contains more potential roosting features. Now considered to hold high roosting potential (PRF-M). 
4	Tree with roosting bat potential (moderate potential/PRF-M – see Target Note 21 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above and landing within this tree during the current survey.

	
5	Tree with roosting bat potential (low potential/PRF-I – see Target Note 37 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above above and landing within this tree during the current survey. 
6	Dis-used barn found in Field Parcel 5 in eastern extent of the site (previous TN53 in 2021 PEA). The barn contains a Barn Owl box, which at the time of the 2021 survey visit, was occupied by Little Owl *Athene Noctua*. [redacted]  



7

[redacted]









8	Large pond found within parcel of plantation woodland ([redacted]. Pond is approx. 500m² in size and is heavily shaded by adjacent and overhanging trees including Willow, Elder *Sambucus nigra*, Oak *Quercus sp.*, Wych Elm *Ulmus glabra*, Sweet Chestnut *Castanea sativa,* Hawthorn *Crataegus monogyna* and unidentified pines. The banks of the pond are shallow and muddy, with sections densely vegetated by Bramble *Rubus fruticosus* scrub. No emergent vegetation noted, with the surface of the pond covered entirely by Duckweed *Lemna minor.* 
9	Pond found in parcel of plantation woodland immediately north of the candidate site (see Pond 5 in 2021 PEA). This pond was previously noted as being large in size (approx. 500-700m²) although was almost dry at the time of the current survey, with approx. 25m² of open water left. The pond is entirely shaded by the adjacent woodland and is choked by leaf litter and woody debris. Remaining water appears turbid. No aquatic or emergent vegetation noted. Banks are shallow and muddy and support mostly young Willow. 
10	Pond found in agricultural field parcel immediately north of the candidate site (see Pond 6 in 2021 PEA). This pond was completely dry at the time of the survey, with its basin entirely covered by ruderal vegetation. Species present indicate that the pond is still likely to hold water for at least part of the year and include Redshank *Persicaria maculosa*, Common Nettle, Fig-leaved Goosefoot *Chenopodium ficifolium*, Pale Persicaria *Persicaria lapathifolia*, Bittersweet *Solanum dulcamara* and American Willowherb *Epilobium ciliatum*. This pond was almost dried-out during the 2021 survey visit.

	
11	Pond found within small woodland parcel immediately north of candidate site boundary (see Pond 4 in 2021 PEA). This was found to be dry during the current survey although in 2021 was noted to be approx. 200-225m2 in size, with turbid water and large amounts of leaf litter. Yellow Iris *Iris pseudacorus* is still present around the pond's location, indicating it still holds water for at least part of the year. The pond is entirely shaded from the surrounding woodland, with shallow muddy banks that support dense Bramble scrub. 
12	Several well-worn mammal pathways and foraging signs were found throughout parcel of plantation woodland in northern extent of the site – these were indicative of Badger, with no evidence found to indicate they were instead made by other small mammals such as Rabbit *Oryctolagus cuniculus*. No setts were found in this woodland during the current survey. Cherry Laurel spreading in this wood.
13	Pond found on edge of plantation woodland in northern extent of the site (see Pond 2 in 2021 PEA). This pond has reduced in size since the 2021 survey visit, and now covers an area of approx. 100m^2. The pond is heavily shaded by surrounding Oaks and subsequently contains large amounts of leaf litter. No aquatic or emergent vegetation noted during current survey, although Yellow Iris and Water-Starwort *Callitriche sp*. were noted here in 2021. Water appears to be poor quality/turbid.

	
14	Pond in centre of field parcel 13 (see Pond 1 in 2021 PEA). This was completely dry at the time of the survey although in 2021 was noted as being approx. 400m² in size. The pond is partially shaded by Willow and Poplar *Populus sp*. scrub. Limited aquatic/emergent vegetation present, with bankside marginal vegetation comprising of Hemlock Water-dropwort, Soft Rush *Juncus effusus*, Common Spike-rush *Eleocharis palustris* and Trifid Bur-marigold *Bidens tripartite*. 2021 survey visit noted evidence to suggest major waterfowl impact. 
15	Tree with high roosting potential (PRF-M – see TN11 in 2021 PEA). Tree contains a bird of prey nest box. No evidence of use found during current survey e.g. feathers, droppings, pellets.

	
16	Tree with high roosting potential (PRF-M – see TN12 in 2021 PEA). A Tawny Owl emerged from this tree during the 2021 survey visit. Tawny Owl may still be nesting within this tree, with feathers found at the base of the tree and splashing/droppings noted along one of the main branches.  
17	Rabbit warren in small woodland copse.


Satellite Imagery © Google 2024

1685

Stephen Arnell

Archived: 07 March 2025 17:03:16
From: [redacted]
Sent: Fri, 13 Dec 2024 15:33:00
To: MCC - PlanningPolicy
Subject: My Representation for the RLDP Deposit Plan consultation.
Importance: Normal
Sensitivity: None
Attachments:
Image.jpeg; Image_1.jpeg;

Hello. Please accept this email as my representation for the RLDP Deposit plan Consultation. I have been advised that this is acceptable.
I have have given up trying to use the online version because it is not possible to save it and go back to it so everything has to be done in one go, which is difficult.
Here is my representation:-

Introduction.
Planning errors, systematic/procedural problems and irregularities.
First of all I should like to point out that, unlike the candidate sites that are chosen to go forward in the deposit plan, there is little transparency of decision-making behind the reasons stated for rejecting the sites that have not gone forward into the Deposit Plan.
It was pure luck that a question I asked [redacted] CS0240 at a drop-in session at Chepstow uncovered the fact that the reason – concern over highway impacts - stated for the rejection of CS0240 on page 32 of the 'Candidate Site Assessment Report' and page 244 'Initial Consultation Report: Preferred Strategy and Candidate Sites Register October 2024' is false.
[redacted] has been very helpful in uncovering the main reason, which is that the site is wholly Grade 2 Best and Most Versatile (BMV) agricultural land.
However that reason also turns out to be false as the premise of comparing site proportions of Grade 2 Best and Most Versatile agricultural land is incorrect; it is the area of BMV agricultural land in square metres that is lost that is important, not the proportion of it on a site, and so it doesn't matter from which site that BMV land is lost.

In the following 'Objections' I also analyse a procedural problem in the way that comments about individual Shirenewton sites have apparently been summarised on pages 232 to 246 of 'Initial Consultation Report: Preferred Strategy and Candidate Site Register October 2024'. Comments 1 to 14 are exactly the same for both the accepted site CS0232 and the rejected site CS0240 and the 8 other rejected sites, making the comments meaningless for the purpose of site selection.

I note from the RLDP Infrastructure Delivery Plan pages 97 to 101 that Policy HA18 for CS0232 identifies financial contributions of £65k+£26k contributions on the 26 house site CS0232 so far and that is in addition to the 50% affordable houses required.
I couldn't recall anything about 50% Affordable housing + contributions (S106 or otherwise) being required at the time of submitting CS0240 (was CS0190) at the second call for candidate sites, so luckily I found a hard copy of the Guidance note for the secondary call for candidate sites (see below), as I can't find it online.
There's nothing in it about a 50% affordable housing + contributions (S106 or otherwise) requirement just the following which I've typed in from the hard copy:-
"Candidate Site Guidance Note - Completing the Second call for Candidate Sites Form. June 2021

8l. Viability - Affordable housing and S106 contributions.
Based on current policy, housing sites typically contribute 35% affordable housing as well as S106 contributions per dwelling. Although these contributions may be subject to amendments in the RLDP, please provide details whether your site is viable based on similar contributions.
8m - would you like the site to be considered for allocation to deliver 50% affordable housing to specifically address affordable housing policy–led element of the growth strategy?
Please state whether you would like the site to be considered for allocation to deliver 50% affordable housing."

There has been no communication changing this to my or [redacted] recollection.
This may have been discussed between the proposers and planning for CS0232 since the candidate site submission, but without similar discussions with the proposers before their sites were rejected this would have been highly irregular.
Candidate sites must be assessed fairly on a level playing field, without any consideration of the benefits to infrastructure from contributions swaying decisions on what sites are put forward for inclusion in the Deposit RLDP, otherwise inferior sites can be chosen in preference to better sites.
To do otherwise would surely invite a legal challenge.

Submitting representations on the Deposit RLDP is not where mistakes, systemic/procedural issues and irregularities by Planning, as highlighted above, should have to be pointed out.
Representers expect the type of information above presented by Planning to be correct.
I don't know how to overcome this problem but ideally corrections should be published so that Representers can make informed representations based on correct data.

Considering the above, the proposers of candidate site CS0240 insist that it must be fairly reassessed as soon as possible without these errors etc. which are more fully explained in the following Objections section and which also lists other important, and I would argue indisputable, facts that must be fairly and impartially considered regardless of the inconvenience to MCC planning.

Objections
The following are objections to an unbalanced distribution of 26 houses included in the Deposit plan for Shirenewton, with all of them allocated on the CS0232 candidate site and none on the CS0240 candidate site, and the unfair rejection of CS0240 on false evidence.

The reasons given for Candidate site CS0240 rejection are invalid, and for the reasons below **The RLDP Deposit Plan is not sound**.
The 'Candidate Site Assessment Report' on page 32 shows that CS0240 site will not be taken forward as a Deposit Allocation, and the reason given '*Site not progressing as concerns have been raised in relation to highway impact. Therefore, the site will not be allocated in the RLDP.*' is false. That reason is echoed in the LPA Response on page 244 of the 'Initial Consultation Report: Preferred Strategy and Candidate Sites Register October 2024'.
No other reasons are given.
I sought clarification from [redacted] me on 05/12/2024 to say:- '*The main reason for rejection of CS0240 Land to the east of Mounton Court (is) related to the site being wholly Grade 2 Best and Most Versatile land, which should have been noted in the Candidate Site Assessment Report. Apologies for this not being noted in the Assessment Report. Highway concerns were raised in relation to the site, although it was recognised that mitigation measures could have been considered as part of a detailed transport assessment.*'
On requesting further details of the decision making I received another email reply with an attachment on 11/12/2024 which says:- '*Further to your email below, MCC highways have commented that 'the highway authority think that the size and scale of the development will have an impact on the immediate local highway network, the level of mitigation and improvements will be subject to detailed analysis and review undertaken as part of the robust transport assessment.'*

For your information please see attached comments from MCC's Highways Officer with regard to CS0240.'
The email attachment confirms that the MCC's Highway officer says 'Yes' in the Recommendation box and so concern about highway impact being the reason given for rejection is incorrect.
[redacted] email goes on to say:- '*As noted below, the main reason for the rejection of CS0240 Land to the east of Mounton Court (is) related to the site being wholly Grade 2 Best and Most Versatile agricultural land.'*
However even this is incorrect for the following reason.
Another Shirenewton site CS0232 has been accepted in the Deposit plan and on page 32 of the 'Candidate Site Assessment Report' it says that although it is partly BMV agricultural land it performs better than other sites with higher proportions of BMV agricultural land. This is echoed in the LPA Response on Page 243 of the 'Initial Consultation Report: Preferred Strategy and Candidate Sites Register October 2024'.
However this is wrong as it is obvious that with widely different sized sites it is not the 'proportion' (underlined by me in the email text above) of BMV land in a site that matters but the area in square metres that is lost!
The whole 0.32ha of CS0240 is BMV agricultural land but it is only 18.2% of the size of the 1.76ha of CS0232. So if the partial amount of BMV agricultural land in CS0232 is greater than 18.2% ie. 0.32ha, (and having viewed the site it is most likely to be much more) then it doesn't matter whether the BMV land is lost from CS0240 or CS0232.
Therefore the two above claims, being incorrect, cannot be legitimate reasons to reject CS0240 and so the site should be included in the deposit plan with a corresponding reduction in the number of houses in CS0232.

This brings us neatly to the size of CS0240.
The reason the size of CS0240 was 0.32Ha and 8 units was so that the eastern end of the site would line up with the eastern end of CS0111 on the opposite side of the lane. See partial plan - Attachment 1. With the rejection of CS0111 it could be reduced to 0.24 Ha and 6 units if required by planning, without a resubmission, as the note pointing to the site on the candidate site submission plan already says:- '*The area outlined in red indicates a possible location and size of candidate site CS0190* (re-numbered by planning as CS0240). *This along with the field edged blue comprise a field owned by the proposers, therefore there is some flexibility re the size and location of the candidate site. This can be discussed with planning.*'

Accepting CS0240 with its 6 or 8 houses at the bottom of the village into the Deposit Plan would mean that the 26 houses in CS0232 at the top of the village would be reduced to 20 or 18 and go some way to balancing out not only the hoist but also the extra traffic from both sites. This would lead to less risk to children and other pedestrians on the village roads from the extra traffic.
This is because the vast majority of the Shirenewton traffic leaves and enters the village at the bottom via the Spout hill and the Usk road because Chepstow is the nearest town for shopping, train and bus stations, and the removal of the M48 Severn bridge tolls has made it more attractive to get to Bristol and England. This increased traffic going through the village if CS0240 is still rejected will be from the 26 houses on CS0232 at the top of the village whereas if CS0240 at the bottom of the village was in the Deposit plan, the volume of traffic travelling through the village would be reduced because it would be from 20 or 18 houses instead.
CS0240 is approximately 150 metres down the lane from its junction with Spout hill which is at the bottom edge of the village with just 2 houses on Spout hill below the junction. So traffic from the CS0240 site would mostly miss out the roads through the village and as such its 6 or 8 houses would not add as much to the traffic going through the village that the equivalent 6 to 8 out of the 26 houses from CS0232 will going through it.
So, whilst the [redacted] in CS0232 may have a short and relatively safe walk to school, all the many other children and any accompanying adults in the village will be at greater risk from the increased traffic when walking or cycling to and from school, with no way of mitigating that risk because the existing narrow roads cannot accommodate any pavements. Therefore reducing the 26 houses to 18 or 20 by allowing 8 or even 6 houses in CS0240 will reduce traffic through the village and the associated risk to pedestrians of all ages.

On the subject of transport, bus stops already exist a 2 to 3 minute walk from CS0240 at the Tan House for the No: 63 bus

Chepstow- Cwmbran- Chepstow, whereas it appears that CS0232 will probably require a new bus stop.

As mentioned in the introduction, my analysis (see the Matrix in Attachment 2) of the representations on pages 232 to 246 of 'Initial Consultation Report: Preferred Strategy and Candidate Site Register October 2024' is that the individual comments against each site seem to have have been summarised, as the comments 1-14 are exactly the same for most of the Shirenewton rejected sites, including CS0240 and the accepted site CS0232. If the comments are against sites that are rejected then they must also be against the accepted site, thus making them meaningless in terms of assessing site suitability. Therefore responses 1-14 must be ignored and cannot be used as reasons to reject CS0240.
Incidentally, just to be clear, with respect to the comment about a green wedge in comment No. 7, site CS0240 does not intrude into the green wedge between Shirenewton and Mynyddbach.

As for viability and deliverability, the Infrastructure Delivery Plan Background Paper (October 2024), Policy HA18 (for CS0232) on pages 97 to 101 shows that there are many issues to be overcome as it has too many TBCs to be sure of viability and deliverability. See also the last few paragraphs below marked with an *
In comparison, for CS0232 there is a known track record on viability and deliverability as the adjacent Mounton Court site, which was also owned by the proposers, proved viable even with 60% affordable housing, and it was one of the first to be delivered under the previous LDP.
As for on-site infrastructure, as stated in the candidate
site submission, the adjacent field, also owned by the proposers, can accommodate a soakaway like the one for the adjacent Mounton Court site. Also similar to Mounton Court, the foul water drain will connect up to the sewer that runs down and inside the North Western boundary of the adjacent field and so will be entirely within the field, unlike CS0232 which will no doubt entail a connection off-site.
The adjacent field can also accommodate Ground Source Heat Pump (GSHP) piping for the houses and any other amenities required by planning. Any road widening, pavements and visibility splays required can easily be accommodated within the site and adjacent field.

The Infrastructure Delivery Plan Background Paper (October 2024) Policy HA18 (for CS0232) on Page 100 says that there are no issues with foul flows being accommodated for this site at the Newport Nash WwTW, so the same applies to CS0240 which uses the same WwTW.

* I note from the RLDP Infrastructure Delivery Plan pages 97 to 101 that Policy HA18 for CS0232 identifies financial contributions of £65k+£26k contributions on the 26 house site CS0232 so far and that's in addition to 50% affordable houses requirement.
I couldn't recall anything about 50% Affordable housing + contributions (S106 or otherwise) being required at the time of submitting CS0240 (was CS0190) at the second call for candidate sites, so luckily I found a hard copy of the Guidance note for the secondary call for candidate sites below, as I can't find it online.
There's nothing in it about a 50% affordable housing + contributions (S106 or otherwise) requirement just the following which I've typed in from the hard copy:-
"Candidate Site Guidance Note - Completing the Second call for Candidate Sites Form. June 2021
8l. Viability - Affordable housing and S106 contributions.
Based on current policy, housing sites typically contribute 35% affordable housing as well as S106 contributions per dwelling. Although these contributions may be subject to amendments in the RLDP, please provide details whether your site is viable based on similar contributions.
8m - would you like the site to be considered for allocation to deliver 50% affordable housing to specifically address affordable housing policy–led element of the growth strategy?
Please state whether you would like the site to be considered for allocation to deliver 50% affordable housing."

There has been no communication changing this to my or our agent [redacted]ecollection.

This may have been discussed between planning and the proposers for CS0232 since the candidate site submission, but without similar discussions with other proposers before their sites were rejected this would have been highly irregular.

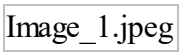
Candidate sites must only be assessed without any consideration of the benefits to infrastructure from contributions swaying decisions on what sites are put forward for inclusion in the Deposit RLDP, otherwise inferior sites can be chosen in preference to better sites.
To do otherwise would surely invite a legal challenge.

[redacted]

Attachment 1. Note CS0190 changed to CS0240 by Planning


Image.jpeg

Attachment 2


Image_1.jpeg

Sent from my iPhone

1692

Edenstone Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Edenstone Homes	Highlight Planning
Address:		
Telephone No:		[redacted]
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We support the Council's identification of key issues, challenges and opportunities, which point towards the need to secure growth at appropriate sustainably located deliverable sites. The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation. For the reasons outlined within the Stage 2 Candidate Site submission and enclosed Vision Document, the proposed development of Vauxhall Fields, Monmouth aligns with the RLDP Vision and will contribute to the achievement of the 17 RLDP Objectives identified within the Preferred Strategy.

Based on the revised RLDP Delivery Agreement (agreed with Welsh Government in October 2024), the RLDP will be adopted in March 2026. This is some 8 years after the proposed start date of the RLDP Plan Period (of 2018) and only some 7 years before the end of the plan period (of 2033). The original RLDP Delivery Agreement (April 2018) proposed that the RLDP be adopted in December 2021 (some 4 and a quarter years before is now proposed). Should there be any further slippage to the preparation of the plan the operational life of the RLDP will be reduced even further. Consequently, we would suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Para 1.1.6 states that it has been informed by a wide range of evidence and responds to challenges which have arisen since the previous Preferred Strategy was consulted on in Summer 2021, namely the Welsh Government's objection to the level of growth set out in the Preferred Strategy. The resultant housing requirement pursued in the Deposit RLDP remains a significant reduction when compared with the Summer 2021 Preferred Strategy. Whilst we acknowledge and appreciate that the Council have had to temper the level of growth pursued due to Welsh Government's objection, we would question whether the evidence base supports the reduced level of growth compared with the Summer 2021 Preferred Strategy.

Whilst we commend the Council in challenging and going beyond the Welsh Government's prescribed maximum growth of 6,210 homes over the Plan Period, we consider that the housing requirement does not provide sufficient growth to redress negative demographic trends for Monmouthshire and harness its economic potential.

Monmouthshire has an ageing population. Between the last two censuses, the average (median) age of Monmouthshire increased by four years, from 45 to 49 years of age. It had a higher average (median) age than nearby Torfaen (42 years) and the joint second-highest average (median) age in Wales (alongside Conwy and behind Powys). The number of people aged 65 to 74 years rose by around 2,500 (an increase of 25.1%), while the number of residents between 35 and 49 years fell by just under 3,800 (19.4% decrease). The share of residents aged between 65 and 74 years increased by 2.5 percentage points between 2011 and 2021. The ageing population will have significant negative implications for the County, including for services and infrastructure, particularly schools with a reduction in school age children. A greater level of growth is required to ensure that communities are balanced and socially sustainable in terms of demography and to help sustain services and facilities and harness and secure further infrastructure delivery.

Monmouthshire is located within Cardiff Capital Region (CCR) which through the City Deal is seeking to increase the number of jobs in the region by 25,000. It will be essential to demonstrate how the targeted increase in population/jobs can be achieved in a way which is compatible and consistent with the LDP strategies of the other LPAs in the CCR. The Council have previously stated that Monmouthshire has *"a once in a generation opportunity to reconsider its future direction. Monmouthshire's unique border county location, the Council's decision to participate in the Cardiff Capital City Region ('CCR') City Deal, and the UK Government's decision to remove the Severn Bridge Tolls in 2018, all present a rare chance for Monmouthshire to become a key economic growth area in the CCR"* (MCC Economic and Development Select Committee: Economies of the Future analysis. Feb 2018). The level of housing growth proposed within the Preferred Strategy does not harness the economic opportunity presented by the CCR City Deal.

The Preferred Strategy recognises that issues of affordability in the County impact on the ability of young people being able to form their own households with the 2021 Census showing a 14% increase in households with non-dependent children. The Preferred Strategy principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on new allocations. Whilst we fully support the Council in looking to address issues of

affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

Flexibility Allowance

A 15% flexibility allowance is proposed within the Preferred Strategy. Given the context within which the RLDP is being prepared (being initially triggered by the failure to address the shortfall of housing land supply within the Authority Area) we consider that a flexibility allowance of 20% should be adopted. Increasing the flexibility allowance from 15% to 20% would provide greater contingency to allow for unforeseen circumstances over the plan period, which will be particularly important given the current uncertainties in the economic climate and the Deposit RLDP's reliance on a small number of strategic sites to deliver a significant component of the RLDP's housing requirement.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We support the Council in amending their position from the Preferred Strategy stage in now making new allocations in Monmouth. However, the level of growth in any new allocations (i.e. those not rolled over from the previous LDP) is not sufficient or proportionate to the sustainability of the town – only 270 homes (at Leasbrook) are proposed as a new allocation in Monmouth. The remaining rollover sites are catering for pent up demand which has been unaddressed owing to any development being stymied by the lack of any strategic solution to the treatment of phosphates.

Without sufficient new growth in Monmouth the benefits of housing delivery not being harnessed in the town. Without enough growth, the town's ageing demographic will not be rebalanced, there will be difficulties in retaining young people and the social and economic sustainability and attractiveness of the town will be impacted negatively. The Summer 2021 Preferred Strategy proposed circa 750 homes in new housing allocations within the town. The economic impact of reducing the level of new allocations (to 260 homes) not delivering these homes means that the employment of some 1,425 people would not be supported and over £2mn of tax revenue would be lost.

Additional new housing allocations should therefore be made in Monmouth. Proposals are being advanced by Edenstone Homes for land at Vauxhall Fields for:

- A range and choice of housing for circa 200 homes (open market and affordable)
- including bungalows;
- Flexible care / retirement / elderly persons accommodation – proposed to meet the
- identified need for such facilities in the area;
- A town centre car park;
- A new Town Park;
- A pedestrian / cycle bridge over the River Monnow linking west Monmouth with the town
- centre;
- A climate resilient development which exceeds MCC's aspirations;
- Play facilities and public open space;
- Sustainable drainage features including and green infrastructure; along with
- The potential for a community building / co-working hub in the southeast of the site (subject to agreement with the LPA and NRW).

The site presents the best option for the sustainable growth of Monmouth and provides a unique opportunity to contribute to the overall soundness of the RLDP – not least through delivering the following key benefits:

- Delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
- Provision of a mix of uses on the most sustainably located site in Monmouth helping to deliver the Council's 20 minute neighbourhood aspirations;
- The potential delivery for extra care / retirement living / older persons accommodation would help meet the needs of an ageing population, reduce social exclusion and enhance wider community wellbeing and provide peace of mind for those with elderly relatives that family members are well looked after in a high-quality, safe and accessible environment in close proximity to the town. Delivery of such accommodation can also stimulate Monmouth and Monmouthshire's housing market through the release of more large homes for families to occupy – the knock on effect being that this stimulates the housing chain and ultimately benefits first time buyers;
- Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting along with the delivery of a bridge into the town to provide better integration from the new and existing neighbourhoods into the town centre;
- Good quality open spaces including a town park which opens up a privately owned area of land providing significant community and amenity benefits for the town;
- Delivery of green infrastructure with biodiversity benefits (delivering a biodiversity enhancement), surface water resilience;
- Development with climate change resilience at its heart – with Edenstone Homes delivering a Net Zero carbon development;
- Economic benefits – including that the proposed development will generate jobs and create additional tax revenue.

On the basis of the technical assessments undertaken to date, there are not considered to be any unresolvable constraints to the proposed development of the site.

In light of the above, land at Vauxhall Fields should for a housing allocation to contribute to the soundness of the RLDP.

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S4

Policy S4 outlines climate change measures that all development proposals '<u>will</u> include' (emphasis added). Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

Whilst supportive of the shift to a low carbon economy and recognising that new development has the potential to deliver innovative approaches to climate change mitigation (such as that proposed by Edenstone Homes at land at Vauxhall Fields), any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge. As set out within the Viability Guidance Note, viability will be key to ensuring that a balanced and sustainable approach is adopted in responding to the Climate Emergency.

Policy NZ1

We acknowledge and support the overarching ambition of Policy NZ1 to enhance energy efficiency and sustainability standards in new residential developments. Addressing climate change and promoting net-zero carbon development are critical goals. However, we have several concerns regarding the practical implementation and implications of the policy as currently drafted. These concerns are outlined below:

Conflict with National Policy

The policy appears to conflict with **paragraph 5.8.5 of Planning Policy Wales**, which states that higher sustainable building standards should only be applied to strategic sites. Paragraph 5.8.5 emphasises that planning authorities should assess strategic sites to identify opportunities for requiring higher standards, such as zero carbon. These higher standards should be supported by robust evidence and must take into account the economic viability of schemes. Applying the standards outlined in Policy NZ1 to all residential developments, including non-strategic housing allocations, goes beyond the national policy framework and risks imposing onerous requirements on smaller sites, potentially undermining housing delivery.

Feasibility and Viability

While we recognise the importance of setting high energy efficiency standards, the specified requirements, including a space heating demand (SHD) of less than 25 kWh/m^2/yr and the generation of 40 kWh/m^2fp/yr of renewable energy, raise feasibility and financial viability issues. For example, energy modelling carried out using advanced methodologies such as Passive House Planning Package (PHPP) often yields SHD values significantly higher than the policy target. This was demonstrated in assessments of several of Edenstone's house types (e.g., Wye: 42–45 kWh/m^2/yr, Dartford: 65 kWh/m^2/yr, Tamar: 59–60 kWh/m^2/yr), even for homes designed to achieve EPC B+/A ratings.

Moreover, while achieving the target SHD via SAP may be feasible with additional costs, the policy appears to favour PHPP or similar modern methodologies, which could further increase costs and complexity. These factors may affect housing affordability and the financial viability of projects, particularly for small and medium-sized enterprises (SMEs).

Consistency and Complexity Across Local Authorities

A significant concern is the lack of consistency in energy standards across local authorities, which creates challenges for developers. Developing bespoke house types and specifications to meet differing local policies is neither practical nor financially viable. The industry would benefit from a standardised, national approach to energy performance standards, such as those proposed under Building Regulations and the Future Homes Standard. Local variation complicates feasibility modelling and risks discouraging development.

Practical Challenges in Implementation

We are also concerned about the practical challenges local authorities face in implementing and enforcing these standards. Instances from other areas, such as Cheltenham, suggest that while ambitious energy targets are set, they are often compromised during the planning process due to viability concerns or a lack of technical expertise to assess compliance. This creates inconsistencies and may undermine public confidence in the standards.

Renewable Energy Generation Requirements

The emphasis on on-site renewable energy generation is commendable, but the requirement to generate 40 kWh/m^2fp/yr or meet the annual regulated electricity demand could be overly rigid in some contexts. Achieving these targets may not always be feasible on sites with constraints such as limited roof space or shading. Furthermore, while improving building efficiency reduces the PV requirement to achieve net-zero regulated energy, adding PV to a slightly less efficient home often represents a more cost-effective path to net zero. Greater flexibility within the policy would enable site-specific, practical solutions without compromising overarching goals.

Public Perception and Communication

From a public perception standpoint, there is a risk that compromises on energy standards, even where justified on technical or viability grounds, may not be well received. It is crucial that the policy sets clear and achievable standards to avoid the need for perceived compromises, which could affect the public's perception of developers' commitments to sustainability.

Performance Gap and Compliance Costs

We support the principle of closing the performance gap through as-built performance surveys. However, this requirement introduces additional costs and administrative burdens, which could disproportionately impact SMEs. We urge careful consideration of these costs to avoid discouraging development, especially in areas with tight margins.

A Call for a Nationally Consistent Approach

While we support the policy's intent, we believe that a more consistent national approach to energy performance standards, via Building Regulations or the Future Homes Standard, would

be preferable. This would provide clarity and consistency for developers across regions and ensure a level playing field, supporting the industry's ability to deliver both sustainable and affordable housing.

Conclusion

While we commend the ambition of Policy NZ1, its application to all housing allocations is inconsistent with **paragraph 5.8.5 of Planning Policy Wales**, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. We urge Monmouthshire County Council to reconsider the scope of Policy NZ1 and to align it with national guidance to maximise its effectiveness while minimising unintended consequences.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S5 outlines green infrastructure measures that all development proposals 'must' incorporate. Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. *HA1 Land to the east of Abergavenny*		

The Deposit RLDP proposes that Abergavenny East will deliver 500 homes within the plan period. Based on the revised RLDP Delivery Agreement, the RLDP will be adopted in March 2026 with there being some 7 years before the end of the plan period (of 2033) post-adoption. Whilst we await further details on the site's housing trajectory to be published, at this stage we would query whether 500 homes can realistically be delivered within the plan period. The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

- From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
- If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
- The average build out rate of sites between 500-999 dwellings is 68 homes per annum.

Abergavenny East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan-led system, the very earliest that Abergavenny East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 68 homes per annum from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 500 homes currently assumed in the Preferred Strategy.

HA2 Land to the East of Caldicot/North of Portskewett

The Preferred Strategy proposes that Caldicot East will deliver 770 homes within the plan period. The conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research outlined above in respect of Abergavenny East are relevant in respect of the plan period contribution of Caldicot East.

Caldicot East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published and the very earliest that Caldicot East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 107 homes per annum (based on Lichfield's research) from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 770 homes currently assumed in the Preferred Strategy.

11. Do you have any comments on the economic policies?
(Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

N/A

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

15.	Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In summary, the key messages outlined within these representations are that they:		

- Support the Council in seeking to achieve economic growth, however we consider that:
  - the reduction in the housing requirement compared with the Summer 2021 Preferred Strategy is not justified and based on a sufficient evidence base;
  - an increased housing requirement should be pursued to align with MCC's wider growth aspirations and to harness the opportunities presented in the area;
  - an increase in the flexibility allowance (from 15% to 20%) should be considered;
  - the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement;
- Object to the level of new housing allocations at Monmouth as it is insufficient and not reflective of the sustainability of the settlement;
- Demonstrate that the best option for growth in Monmouth would be through the allocation of land at Vauxhall Fields as it would contribute to the vision and objectives of the RLDP and the achievement of sustainable development; and
- Object to the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	x
	No:	x

If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?	Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The Deposit RLDP fails Test 1 (Does the Plan fit) as an increased housing requirement should be pursued to align with MCC's wider growth aspirations. Moreover, it does not allocate sufficient new housing allocations in Monmouth reflective of the sustainability of the town.

The Deposit RLDP fails Test 3 (Will the Plan deliver) as **an increase in the flexibility allowance (from 15% to 20%) should be considered and the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement. Moreover,** the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1694

The Stantonbury Building and Development Company

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	The Stantonbury Building and Development Company Ltd	Context Planning
Address:	C/o Agent	[redacted]

Telephone No:		[redacted]
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	Support
	Objection:	

We note the following points made in the key issues, challenges, vision and objectives section of the Deposit RLCP:

- Monmouthshire has the highest average house prices in Wales.
- 2,064 households are identified as being in need of affordable housing.
- There is an acknowledged limited brownfield resource available in Monmouthshire.
- It is not possible to avoid the development of BMV land given the widespread distribution throughout Monmouthshire.

We therefore support Objective 10 and the need to provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents. The RLDP should seek to meet this need in full.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	Object

The RLDP makes provision for approximately 5,400- 6,210 homes over the Plan period (2018-2033). Taking into account completions since 2018, homes under construction, sites with planning permission, 'rollover' allocations, windfall sites and small sites, the RLDP

seeks to make new site allocations for approximately 1,320 – 2,130 new homes, including 660 – 1,065 new affordable homes.

The Housing Requirement is now significantly reduced from that proposed in the previous Preferred Strategy in July 2021 (7,605 homes). This is principally as a result of the Welsh Government's concerns about growth in Monmouthshire undermining Future Wales focus for strategic economic and housing growth in the SE Wales National Growth Area, and their judgement that this approach was not in general conformity with the National Development Framework. The Welsh Government ruled in 2023 (in their response to the 2nd Preferred Strategy Consultation) that a smaller level of growth of 5,400 dwellings, plus an additional flexibility allowance of 10% (5,940 dwellings), was in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region. No evidence was published outlining how the Welsh Government came to these conclusions. We remain sceptical that 7,605 new homes within Monmouthshire would fundamentally and significantly undermine the SE Wales National Growth Area, but that 5,940 new homes would not.

An alternative approach to the Welsh Government's low growth policy position is required that is capable of providing the more positive planning interventions needed to address the issues identified. Higher growth options should be considered based on the published evidence and significant issues facing the County.

We are of the view that there is a severe need to deliver affordable housing (in line with Objective 10), particularly for younger people, such that the previous Preferred Strategy target of 7,605 homes is a more appropriate target to plan for in the RLDP (as a minimum), given that the Council has an acute need for affordable housing of approximately 7,000 affordable units over the plan period (as stated by the Welsh Government).

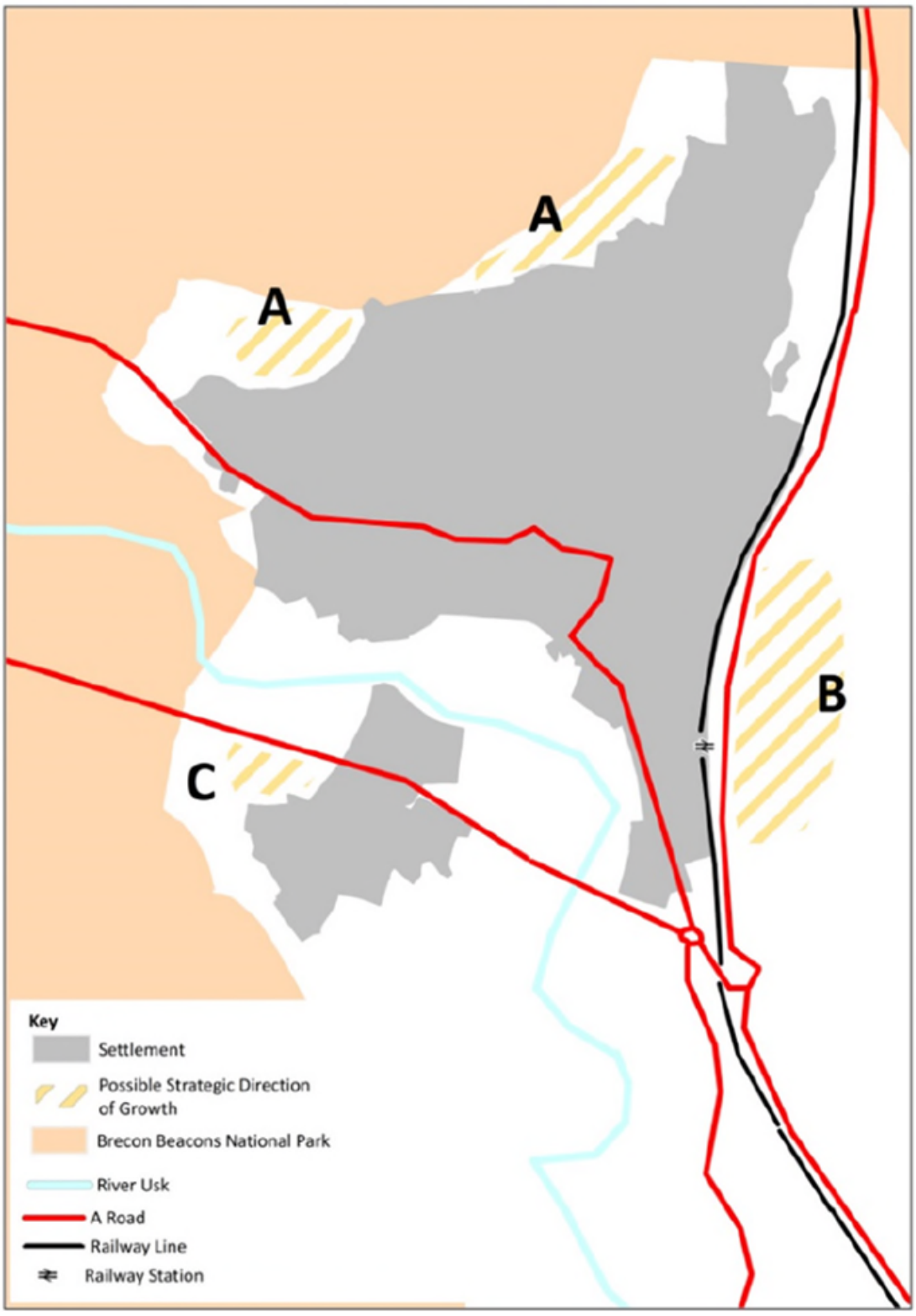
Additional housing allocations are therefore required to make the plan sound.

Land north of Abergavenny would be a sustainable location for additional growth, as evidenced by the Integrated Sustainability Appraisal (ISA 2024). The ISA reviewed options for growth at Abergavenny (see Figure 6-1). Option A (land to the north of Abergavenny) performed most positively against many of the ISA themes.

My client's site - Candidate Site CS0108 (Land North of Hillgrove Avenue) – is located on the north eastern edge of Option A, in the Mardy area of Abergavenny, and has previously been considered by the Council to be compatible in principle with the Preferred Spatial Strategy and to not to not be subject to fundamental constraints that cannot be mitigated (in the Candidate Sites High-Level Assessment, July 2023). Site CS0108 would contribute to a greater amount of strategic growth to the north of Abergavenny, in a sustainable location which, as highlighted in our response to Policy S2, is one of the most unaffordable areas in Monmouthshire, and has a high number of households with an affordable housing need.

The settlement boundary of Abergavenny should also be amended so that Site CS0108 is included within the settlement boundary.

Figure 6-1: Strategic growth options in Abergavenny and Llanfoist



In reducing the overall housing numbers from previous versions of the preferred strategy, the Council has increased the requirement for onsite affordable housing provision to 50%. We are concerned that this will make some sites undeliverable and limit deliverability. A lower delivery of housing in general, with a higher percentage of onsite affordable housing will also exacerbate the rising costs of market housing and therefore worsen general affordability of housing, in an area with the highest house prices in Wales. To achieve the Council's housing objective, a lower percentage of onsite affordable housing and a higher delivery of housing would lead to a better balance of housing for Monmouthshire.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	Object

We support the identification of Abergavenny as a Tier 1 Primary Settlement.

The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, reflecting the range of services, facilities and transport available.

We note the findings of the Sustainable Settlement Appraisal which confirm that the average house price in Mardy, in the northern part of Abergavenny (£401,881) is amongst the highest within the town, and higher than the Monmouthshire average. The Lower Quartile House Price to Income Ratio (a metric that indicates how affordable it is to buy a home in a local area) is 13:1 in Mardy – the second highest in the town – illustrating the unaffordable nature of housing in Abergavenny as a whole, and Mardy in particular. It means that that full-time employees can expect to spend around 13 times their annual earnings on a home. There are 575 households identified with affordable housing needs.

Given that Abergavenny is identified as a primary settlement outlining its inherent sustainability as a settlement, has such an issue with housing affordability, and has a significant number of households identified with affordable housing needs, we are of the view that the town should be allocated a greater distribution of residential growth over the plan period, increasing from the current indicative percentage of 22%, commensurate with its position at the top of the settlement hierarchy, being the principal town in Monmouthshire.

My client's site- Candidate Site CS0108 (Land North of Hillgrove Avenue)- has previously been considered by the Council to be compatible in principle with the Preferred Spatial Strategy and to not be subject to fundamental constraints that cannot be mitigated (in the Candidate Sites High-Level Assessment, July 2023). Site CS0108 would contribute to a greater amount of strategic growth to the north of Abergavenny, in a sustainable location which, as highlighted in our response to Policy S2, is one of the most unaffordable areas in Monmouthshire, and has a high number of households with an affordable housing need.

The settlement boundary of Abergavenny should also be amended so that Site CS0108 is included within the settlement boundary.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
	Support:	

Is your representation in support or objection?	Objection:	
No comment.		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	Object
Policy S7 The Welsh Government response to the RLDP 2nd preferred strategy consultation in 2023 states that the Council has an acute need for affordable housing, approximately 7,000 units		

over the plan period. Policy S7 sets out the affordable housing target for the RLDP at 1,595-2,000 homes. The Local Housing Market Assessment Refresh 2022- 2037 (LHMA, May 2024) estimates a net need of 453 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027), with a further 82 affordable homes per year for the remaining ten-year period. This would represent an affordable housing requirement of 3,085 homes if extrapolated over the Plan period.

The plan is not meeting the full need for affordable housing within Monmouthshire (either the Welsh Government derived figure or the LHMA derived figure) and should be revised, increasing both the affordable housing target, and the overall housing target, given that the main delivery mechanism will be to require delivery of affordable housing from the site allocations. We consider that as a minimum Policy S7 should include a revised affordable housing target of 3,085 homes, in order to meet the evidenced need in the LHMA. We do not accept the contention in the RLDP that this figure is unrealistic.

The RLDP should seek to allocate further housing sites in sustainable locations in order to deliver additional market and affordable housing, including land north of Abergavenny which has been identified in the Integrated Sustainability Appraisal (ISA 2024) as a sustainable location for strategic growth. Land to the north of Abergavenny performed most positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, with this option most well located in this respect.

Candidate Site CS0108 (Land North of Hillgrove Avenue) has previously been considered by the Council to be compatible in principle with the Preferred Spatial Strategy and to not be subject to fundamental constraints that cannot be mitigated (in the Candidate Sites High-Level Assessment, July 2023). Site CS0108 would contribute to a greater amount of strategic growth to the north of Abergavenny, in a sustainable location which, as highlighted in our response to Policy S2, is one of the most unaffordable areas in Monmouthshire, and has a high number of households with an affordable housing need. The site is capable of delivering between 60-80 dwellings, contributing to both market and affordable housing delivery.

In reducing the overall housing numbers from previous versions of the preferred strategy, the Council has increased the requirement for onsite affordable housing provision for new site allocations in Policy S7 to 50%. We are concerned that this will make some sites undeliverable and limit deliverability.

Policy H1

The settlement boundary of Abergavenny should be amended so that Site CS0108 is included within the settlement boundary.

Policy H9

We support the flexibility that Policy H9 provides for affordable housing exception sites adjoining Tier 1-4 settlements.

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	Object

Policy S8

As outlined in our response to Policy S7, we are concerned that the requirement for the provision of 50% affordable homes on-site for new site allocations will make some sites undeliverable and limit deliverability.

Policy HA1

Policies HA1 – HA18 detail the new housing allocations policies setting out specific requirements associated with each site. There are two site allocations identified for Abergavenny, allocated in Policies HA1 and HA5.

Policy HA1 is a strategic site allocation for 500 homes. We have significant concerns over the sustainability and deliverability of this site.

The site is located on the eastern edge of Abergavenny and is bounded by the A465 and railway line to its western boundary and the footslopes of the Ysgyryd Fach (Little Skirrid) to the east. Development here will expand the built-up area of the town beyond the railway line and A465 which currently form a hard development boundary to the town.

Due to its location, the site has a large range of requirements to deliver identified in Policy HA1 and the Infrastructure Delivery Plan (IDP), including:

- 50% affordable housing
- 1ha of employment land
- A neighbourhood centre
- A park and ride facility serving the train station
- Active travel connections between the site and the town across the A465
- A465 reconfiguration to provide safe and accessible crossings (potentially including a bridge)
- Appropriate crossings over the railway line
- Off site highway infrastructure improvements, including accesses and junction onto the A465

- Public transport financial contributions for improved public transport and bus frequency
- Network rail financial contributions for improvements to the train station
- Undergrounding of high voltage electricity cables
- Education contributions for school transport
- Onsite green infrastructure including formal open space, amenity open space, parks and gardens, natural and semi-natural space, community orchards and community growing
- Net biodiversity benefits provided on site
- Public right of way enhancements
- Neighbourhood play area, local equipped play area and open space provided on site
- Allotments provided on site

Many of these infrastructure items are uncosted in the IDP, with a broad range of funding sources and delivery bodies, and unknown phasing periods. Some, such as the active travel routes, are required to be in place prior to the first occupation of houses. The list is large, and some of these are 'big-ticket' items, which will come with complicated delivery mechanisms and funding arrangements. We are concerned that the complex nature of this site means that the Council has been too ambitious in terms of how many homes can be delivered in the plan period. We are also concerned that this list of infrastructure items will affect site viability, and that items such as the 50% affordable homes requirement may prove to be undeliverable. Should the site struggle to deliver or be delayed there will be significant implications for overall plan delivery.

Appendix 9: Housing Trajectory

Table 1: The Timing and Phasing of Allocations (2018-2033)

Settlement Tier	CS Ref	RLDP Policy Ref	Site Name	Total Site Capacity	Planning Application Details where applicable	Time lag to construction start in			Phasing of Development (2018-33) (Base Date 1st April 2024)																					
						Time period for pre-application discussions/ PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Actual Completions							Estimated Completions														
									Completions To Date	U/C (units also incl. in phasing)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mth	Units phased beyond the plan period
											1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9 mths	
Abergavenny (Tier 1)(Primary)	CS0213 & part CS0293	HA1	Land to the East of Abergavenny	500		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	70	90	90	90	90	70	
Abergavenny (Tier 1)(Primary)	CS0094	HA5	Land at Penlanlas Farm	100		4 months	6 months	6 months	0	0	0	0	0	0	0	0	0	0	0	50	50	0	0	0	0	0	

The RLDP is not due to be adopted until mid-2025 at the very earliest (which by logic would mean during the plan year 2025/26). The housing trajectory estimates that first delivery of housing on this site will occur in 2028/29 (4 years after adoption), with 70 completions, and then delivers at 90 homes a year until 2033, with the final 70 homes delivered in the last 9 months of 2033 (total of 500 homes delivered in 6 years, averaging 83 completions per year).

Evidence produced by Lichfields[1] on the build out of large-scale residential development sites should be used to sense check and validate the assumptions made in the RLSP housing trajectory. This is a comprehensive piece of research, analysing 179 large sites in England and Wales, (equivalent to over 365,000 dwellings), which focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the

[1] https://lichfields.uk/content/insights/start-to-finish-3

planning system and how quickly they are built out. Key findings from the report that are relevant to the consideration of site HA1 include:

- 67 dwelling average (mean build out rate, set within a range of between 44 at the lower quartile to 83 at the upper quartile) annual build-out rate range for schemes of 500- 999 dwellings
- 4.9 year average (mean) timeframe from validation of the first planning application to completion of the first dwelling for schemes of 500- 999 dwellings (consisting of a 3.4 year planning approval period and 1.5 year planning to delivery period).

We question whether it is therefore realistic for HA1 to deliver as indicated in the housing trajectory. The 4.9 year average (mean) timeframe derived from the Lichfields evidence (from validation of the first planning application to completion of the first dwelling) would mean that the earliest the site could possibly start delivering would be the year 2029/30. This would also assume a planning application would be registered immediately following adoption of the RLDP in the year 2025/26, which seems unlikely given the complexity of the site, and the large amount of infrastructure required prior to occupation of homes.

The timescale for delivery is also likely to be greater than anticipated as the site is under fragmented ownership; it is being promoted by a housing association which appears not to have secured planning permission for a site of this size in the past; and has significant infrastructure to be delivered in advance of housing delivery. The estimated average of 83 homes delivered per year is right at the very upper limit of the Lichfields evidence. Using the mean average of 67 homes delivered per year (as per the Lichfields evidence), the site is more likely to take 7.5 years to build out rather than 6, meaning that there is a very good likelihood that the site will not be capable of delivering all 500 dwellings within the plan period. Our estimate is that the maximum number of homes that site HA1 could be expected to deliver within the plan period is 335. This puts the delivery (and therefore soundness) of the RLDP as a whole at risk.

This also has to be viewed in the context that large strategic sites in Monmouthshire have under delivered historically due to long lead in times to implement infrastructure prior to the delivery of units (as evidenced in the Monmouthshire AMR 2014-2019).

In terms of the site's location, development at the HA1 location would breach the existing defined boundary for Abergavenny provided by the Railway line and A365. The extent of development here would be undefined, with no clear boundaries to demarcate the limits of development, right at the foot of a prominent and important hillside.

Whilst there are clear benefits to identifying Strategic Site Allocations which can provide a valuable contribution to housing, their ability to deliver the number of units allocated in the RLDP is questionable, particularly for site HA1. A greater number of small/medium allocations is considered essential to make up for this potential shortfall in delivery. There are better site allocation options to the north of the town which fit with the existing pattern of development of Abergavenny, would be more in keeping with the historic development of the settlement, and crucially would be capable of delivering in the plan period.

Suggested Additional Site Allocation North of Hillgrove Avenue

In this regard, the Stantonbury Building and Development Company Ltd are promoting Land North of Hillgrove Avenue (Site CS0108) which would make a logical, smaller scale extension to Abergavenny, appropriately rounding off development in the northern part of the settlement, adjacent to a recent housing development which was allocated under the current local plan. A Vision Document has been prepared and is submitted with these representations to show how the site could be developed with the capacity of 60 to 80 dwellings.

The site is 2.87ha in size, located to the north of Hillgrove Avenue on the northern edge of Abergavenny, within the Mardy area. The site comprises two broadly rectangular fields separated by a mature central hedgerow running east/west through the centre of the site, with a smaller strip of land in the south east corner which connects to Hillgrove Avenue. Development here would be a natural "rounding off" of development at Abergavenny in this location with clear boundaries, the AONB boundary to the north and west and development to the south and east.



SITE LOCATION PLAN
Image Source: OS Plan

The northern boundary of the site is defined by a hedgerow and runs parallel with a narrow rural lane (Ty Gwyn Lane) which connects Hereford Road to the east with Old Herford Road to the west. The hedgerow has been cut back so there are views into the site from the lane. A gated access into the site is provided in the north east corner. On the opposite side of the lane, beyond a belt of trees is a large house and Ty Gwyn Hall, Elysium Healthcare.

The southern boundary is a thick tree and hedge belt which runs along the boundary between the site and Llantilio Pertholey CV Primary School located to the south of the site. A narrower area of the site extends down to meet the end of Hillgrove Avenue in the South east corner of the site.

The eastern boundary is a mature hedgerow. Beyond this is the recent Persimmon Homes development.

The western boundary is defined by a further hedgerow with further green fields beyond.

Trees are located within the hedgerows around the boundaries of the site and within a central hedgerow running east-west through the site. A number of the trees within boundaries are subject to Tree Preservation Orders (TPO).

The development of the site would not have any direct impact upon any designated sites.

The existing access point into the land is sufficiently sized to enable it to be used and there would therefore be no loss of trees or hedgerows to formalise this into an adoptable access arrangement.

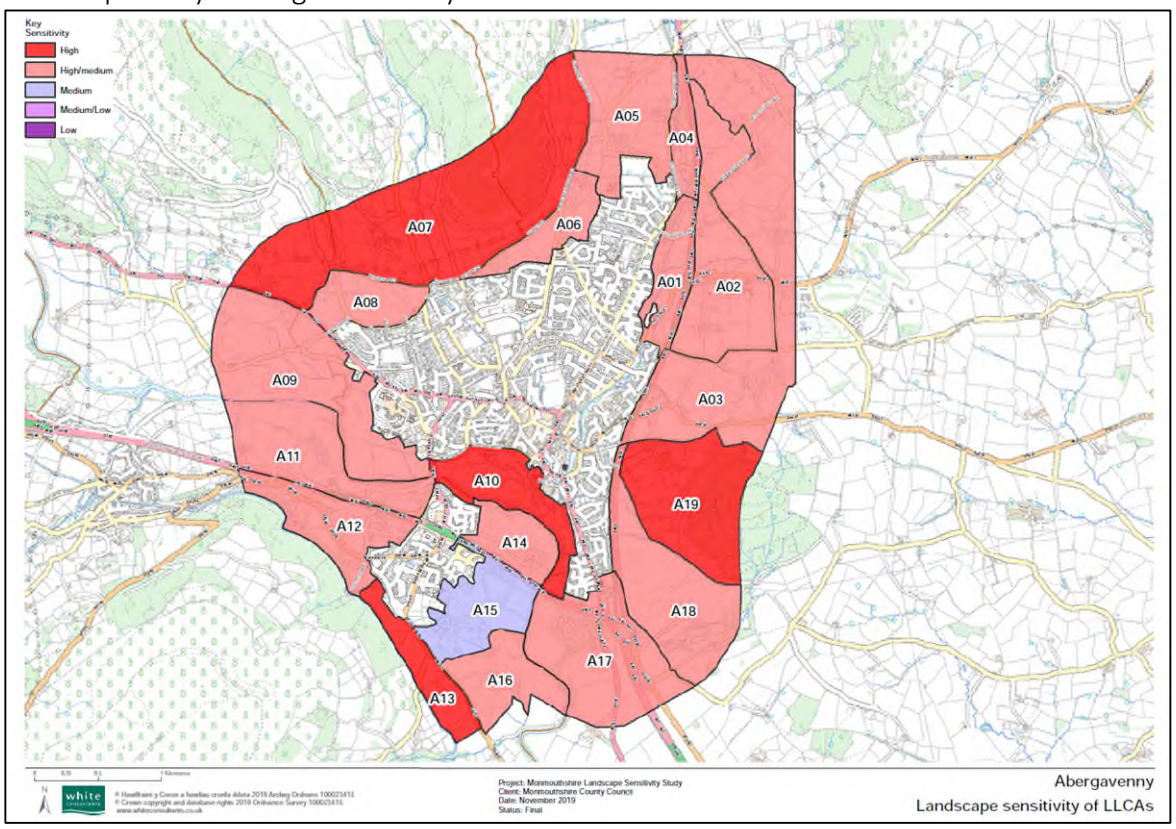
A full Landscape and Visual Impact Assessment will be undertaken in due course. However, due to the site's proximity and relationship with the adjacent Persimmon Homes development (App Ref DC/2014/01360), it is possible to draw some preliminary conclusions based on the LVIA undertaken for that site, although acknowledging that parts of the site will be more visible in longer range views due to the topography.

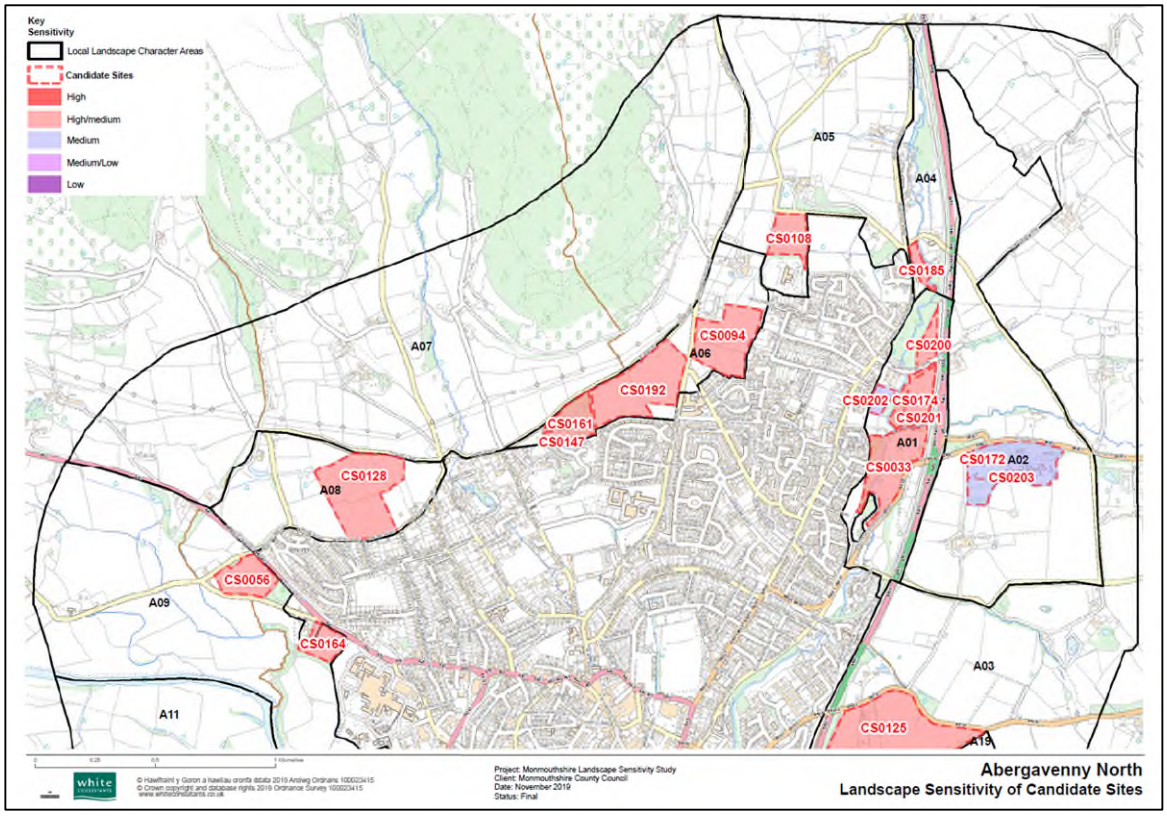
The LVIA for the Persimmon Homes scheme concluded that a sensitively designed residential development of that site would not be detrimental to the character or the setting of the National Park at this northern edge of Abergavenny and would form a more appropriate transition into the edge of the national park landscape in this vicinity. These conclusions can be extended to include Site CS0108. Site CS0108 is predominately on higher land than the Persimmon site. However, the impact on viewpoints would be similar. The site is largely enclosed, partly by housing and the school to the south; the wooded character; and hospital to the north, and any impact can be mitigated by provision of a green buffer provided on the western side of the site.

The conclusions of the Planning Inspector at the Examination of the Monmouthshire Local Development Plan, when allocating the Persimmon site apply equally to the proposal site:

'In comparison with the full extent of Abergavenny and Mardy, much of which can be seen from surrounding viewpoints such as The Skirrid, development on the allocated site would not result in a significant extension of built form into the open countryside. It would, therefore, preserve the landscape setting and have no serious adverse effect on significant views out of the National Park. Neither would it cause unacceptable harm to the qualities that justify the designation of the BBNP or its setting...'

Information from the Monmouthshire Landscape Sensitivity Update Study shows that the site is located in a high/medium sensitivity area, which is the same as allocated site HA5, which is located just to the south west of Site CS0108. Strategic Site HA1 by contrast is located partially in a high sensitivity area.





Flood Risk map from Natural Resources Wales shows the site outside of any river flood risk areas and is not at risk from surface water flooding.

A preliminary Transport Statement Scope was prepared in 2016 which considered a scheme for 50 dwellings on the subject site. The report notes that access to the site is via Hillgrove Avenue, which is a conventional 2-way estate road, with a junction onto Hereford Road and good visibility for the 30mph speed limit. The northern section of Hillgrove Avenue does not include footways. However, the western verge falls within Highway land, so this could be addressed as part of the development of the site to provide a continuous pedestrian link.

The site location provides convenient access to local facilities in Mardy, including schools, and local shopping facilities. The site is also within walking distance of the wider range of facilities located towards the centre of Abergavenny.

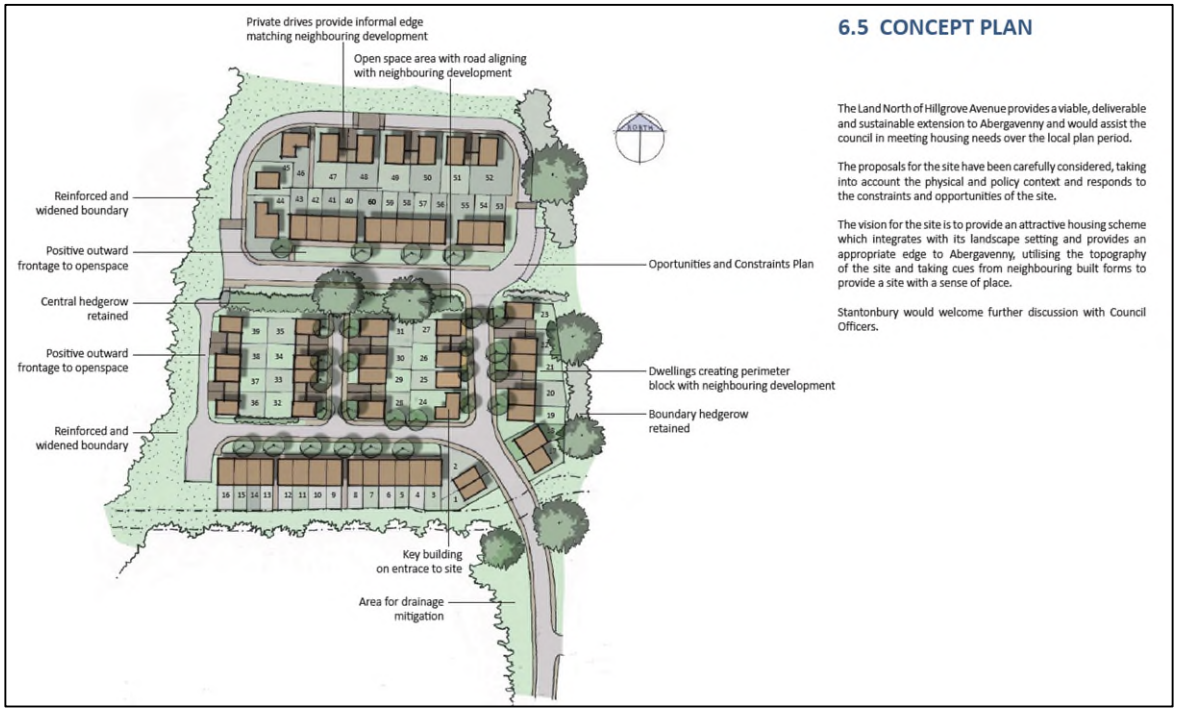
Access to the existing public transport network is within close proximity to the site. There are a number of bus stops located along Hereford Road and Poplars Road which are within walking distance of the site which provide services into Abergavenny, Cardiff and Pontypridd.

The closest heritage asset is the grade II listed St Teilo's House, some 280m from the subject Site. St Teilo's Church (grade I) is located further to the east. St Teilo's House is separated from the site by the neighbouring Persimmon Homes development. In approving planning permission for the Persimmon Homes scheme, It was considered that the development would not harm the Character or setting of any listed buildings, or their historic or architectural significance. Given that the Persimmon site is in closer proximity to these assets, it must be concluded that development of the subject site would also not cause any harm to these heritage assets.

Opportunities identified in the Vision document for the site include:

- The existing trees and hedges around the boundaries of the site and through the centre of the site would be retained as far as possible, with any access points passing across these kept to a minimum, with replacement planting secured where necessary.
- The western boundary of the site is the most sensitive from a landscape perspective, due to the open nature of land to the west and this being the highest point of the site. For this reason, it is proposed that this boundary would be reinforced and widened to provide an appropriate landscape buffer. This would also provide the opportunity to create a positive area of public open space.
- Open areas would also be created around the south eastern area of the site to accommodate drainage features which respond to the natural drainage of the site.
- The retention of key hedgerows and trees and enhanced landscape buffers which could include species rich planting would provide a positive impact on biodiversity on site.

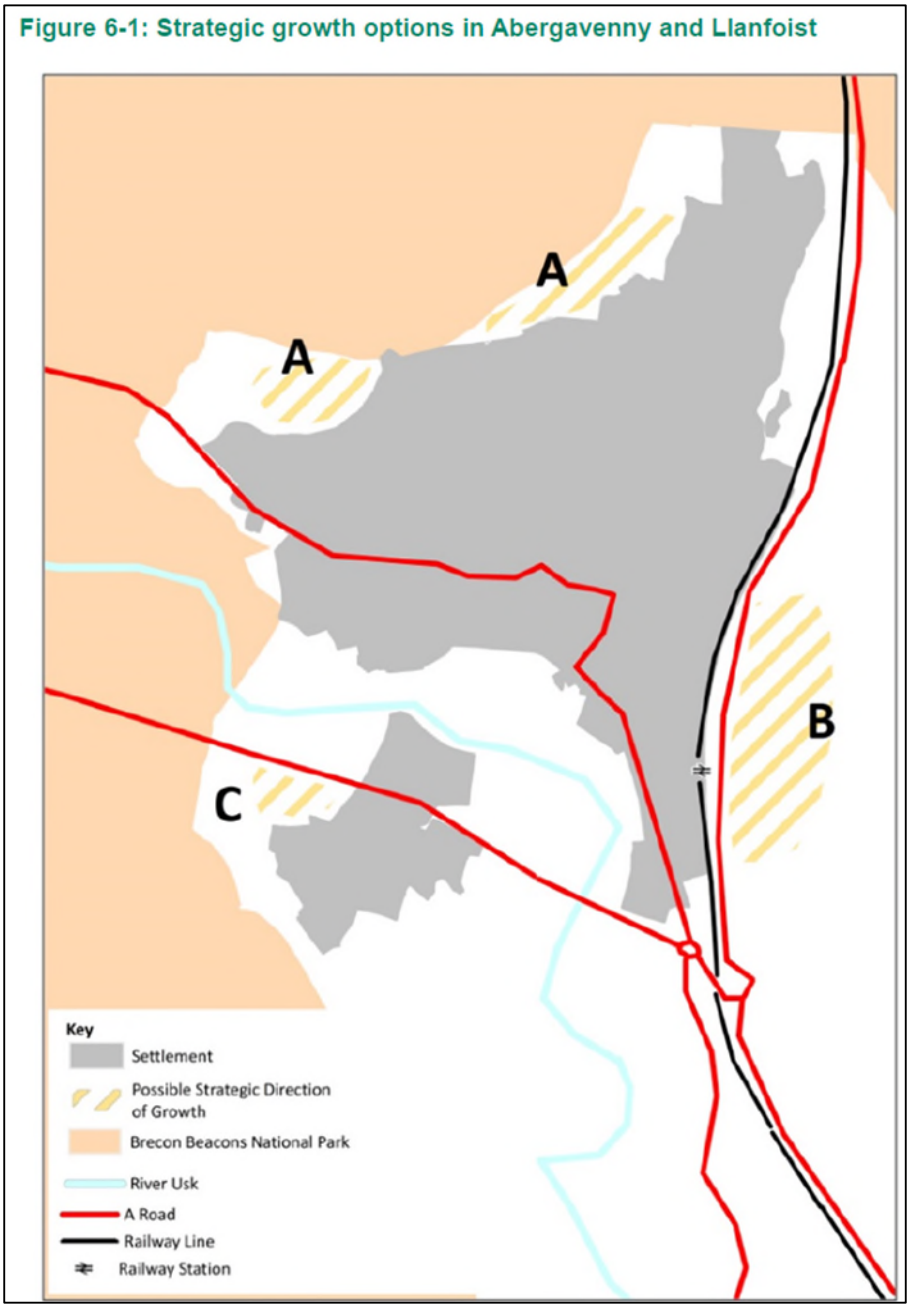
- There are two existing access points into the site. However, the south east access is the most appropriate to use from a residential development perspective as an access in this location would integrate with surrounding residential development and would mean the rural nature of the lane to the north is retained.
- Adoptable highway would lead into the site from the site entrance to serve the two parcels of land.
- The concept layout plan shows approximately 60 units; however up to 80 dwellings could be accommodated depending on the types of units proposed.





The site is located within a sustainable location for additional growth, as evidenced by the Integrated Sustainability Appraisal (ISA 2024). The ISA reviewed options for growth at Abergavenny (see Figure 6-1). Site CS0108 is located within Option A (land to the north of Abergavenny).

Figure 6-1: Strategic growth options in Abergavenny and Llanfoist



The ISA 2024 concluded:

- Option A performs most positively of the Options for the majority of ISA Themes covering Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement given this Option is most well located in this respect.

- Option A is best performing against the ISA Natural Resources theme as it has the greatest access to the town centre.
- All options have a high/medium landscape sensitivity to residential development.
- Option A is considered the best performing against the ISA Economy and Employment theme given it is reasonably well connected with the town centre and employment opportunities; and is not detached by the A465; as is the case for Options B and C.
- Option A performs most positively against the ISA Population and Communities theme as it is the most well connected with the town centre, its services and facilities, and sustainable travel. Option A is most likely to support the growth/ regeneration of Abergavenny as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.
- Option A is best performing in terms of proximity to health services. Option A performs similarly to other options in terms of supporting healthy forms of transport to reach health (and wider) services/ facilities. Option A is less well located in terms of access to the train station; however, it is recognised that the Abergavenny circular bus service provides improved access to some extent.
- All Options perform positively against the Equalities, Diversity, and Social Inclusion ISA theme through supporting the growth and regeneration of existing communities, improving access to housing, jobs and services. Option B performs least well of the Options given it is severed from the settlement by the A465, which may reduce potential for positive integration with existing communities.
- All Options perform similarly against the Transport and Movement ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station.
- All Options perform negatively against the Natural resources (air, land, minerals, and water) ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing of the Options as it may encourage active travel to some extent, given its location 1 mile from the town centre; and is the least constrained Option in terms of BMV agricultural land.
- Given uncertainties no significant differences between the Options against the Landscape ISA theme in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the intrinsic qualities, character and setting of designated landscapes/ assets depending on the design and layout of development.

In conclusion:

- We have significant concerns over the sustainability and deliverability of the HA1 Strategic Site.

- Our estimate is that the maximum number of homes that site HA1 could be expected to deliver within the plan period is 335. This puts the delivery (and therefore soundness) of the RLDP as a whole at risk.
- This assumes the necessary infrastructure can be delivered in a timely fashion and can be viably provided, for which there is a lack of evidence to confirm.
- A greater number of small/medium allocations are considered essential to make up for this potential shortfall in delivery at Abergavenny.
- There are better site allocation options to the north of the town which fit with the existing pattern of development of Abergavenny, would be more in keeping with the historic development of the settlement, and crucially would be capable of delivering in the plan period. The northern area is proven to be a sustainable location for growth as evidenced by the ISA 2024.
- The Stantonbury Building and Development Company Ltd are promoting Land North of Hillgrove Avenue (Site CS0108) which would make a logical, smaller scale extension to Abergavenny, appropriately rounding off development in the northern part of the settlement, adjacent to a recent housing development which was allocated under the current local plan. A Vision Document has been prepared and is submitted with these representations to show how the site could be developed with the capacity of 60 to 80 dwellings.
- We are therefore seeking a new residential site allocation in the RLDP at Site CS0108. Allocation would mitigate for under delivery elsewhere and it would build in a degree of resilience to the plan which is currently absent.

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	

No comment.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	No
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
Fails Test 2: Is the Plan appropriate		Fails Test 3: Will the Plan deliver
x		x

(is the Plan appropriate for the area in light of the evidence)?	(is it likely to be effective)?

In summary:

- An alternative approach to the Welsh Government's low growth policy position is required that is capable of providing the more positive planning interventions needed to address the issues identified. Higher growth options should be considered based on the published evidence and significant issues facing the County.
- We are of the view that there is a severe need to deliver affordable housing (in line with Objective 10), particularly for younger people, such that the previous Preferred Strategy target of 7,605 homes should be the minimum target to plan for in the RLDP (as a minimum), given that the Council has an acute need for affordable housing of approximately 7,000 affordable units over the plan period (according to the Welsh Government).
- In reducing the overall housing numbers from previous versions of the preferred strategy, the Council has increased the requirement for onsite affordable housing provision to 50%. We are concerned that this will make some sites undeliverable and limit deliverability.
- We consider that at minimum Policy S7 should include a revised affordable housing target of 3,085 homes in order to meet the evidenced need in the LHMA. We do not accept the contention in the RLDP that this figure is unrealistic.
- Additional housing allocations are therefore required to make the plan sound, meet identified needs, and ensure that it is deliverable and viable.
- Given that Abergavenny is identified as a primary settlement outlining its inherent sustainability credentials, has such an issue with housing affordability, and has a significant number of households identified with affordable housing needs, we are of the view that the town should be allocated a greater distribution of residential growth over the plan period, increasing from the current indicative percentage of 22%, commensurate with its position at the top of the settlement hierarchy, being the principal town in Monmouthshire.
- We have significant concerns over the sustainability and deliverability of the HA1 Strategic Site east of Abergavenny.
- Our estimate is that the maximum number of homes that site HA1 could be expected to deliver within the plan period is 335. This puts the delivery (and therefore soundness) of the RLDP as a whole at risk.
- A greater number of small/medium allocations is considered essential to make up for this potential shortfall in delivery at Abergavenny.
- There are better site allocation options to the north of the town which fit with the existing pattern of development of Abergavenny, would be more in keeping with the historic development of the settlement, and crucially would be capable of delivering in the plan period. The northern area is proven to be a sustainable location for growth as evidenced by the ISA 2024.
- Stantonbury are promoting Land North of Hillgrove Avenue (Site CS0108) which would make a logical, smaller scale extension to Abergavenny, appropriately

rounding off development in the northern part of the settlement, adjacent to a recent housing development which was allocated under the current local plan. A Vision Document has been prepared and is submitted with these representations to show how the site could be developed with the capacity of 60 to 80 dwellings.

- Site CS0108 has previously been considered by the Council to be compatible in principle with the Preferred Spatial Strategy and to not to not be subject to fundamental constraints that cannot be mitigated.
- We are therefore seeking a new residential site allocation in the RLDP at Site CS0108. The settlement boundary of Abergavenny should also be amended so that Site CS0108 is included within the settlement boundary.
- Site CS0108 would contribute to a greater amount of strategic growth to the north of Abergavenny, in a sustainable location, which is also one of the most unaffordable areas in Monmouthshire and has a high number of households with an affordable housing need.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	English

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1736

Bellway Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Bellway Homes Limited	[redacted]
Address:	[redacted]	[redacted]
Telephone No:		

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Bellway Homes Limited (Bellway) agree in principle that Monmouthshire is subject to a number of challenges which have caused significant delay in the plan making process, and note the vision. Through the further questions Bellway provide comments, objections and support for varying elements.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S1 sets out the Council's Preferred Growth Strategy, which is based on a demographic-led scenario and proposes a housing provision of 6,210 homes (which includes

a 15% flexibility allowance) to meet a housing requirement of 5,400 homes for the plan period 2018-2033.

Whilst Bellway support, in principle, the increase from the 2023 Preferred Growth Strategy (5,940 homes which included a 10% flexibility allowance to meet a housing requirement of 5,400 homes) only, Bellway still object to the considerable reduction from the previous 2021 Preferred Strategy amount of 8,366 homes for the plan period 2018-2033, of which 3,658 homes were proposed to be allocated through new sites.

The revised draft Policy S1 now proposes for 1,320 – 2,130 new homes to come forward as allocated sites, as 4,080 homes comprise a landbank figure of existing commitments. Given the delays that have occurred, the landbank figure is increasing and consequently diminishing the required allocations. The delays, in part, have been caused by COVID-19, phosphates, as well as the intervention from Welsh Government, which resulted in further consultation and revised figures.

Therefore, Bellway consider it necessary for the plan period, currently set at 2018-2033 to be rolled forward to 2021-2036. Moreover, to ensure the consistent delivery of dwellings, it is considered that additional sites (resulting in a 20% flexibility allowance similar to that originally proposed by Bridgend Council in their LDP) should be allocated within the Draft LDP to provide a contingency, should some allocated sites fail to be delivered at the rate set out within the housing trajectory. This would ensure the consistent delivery of homes throughout the Plan period.

Consequently, the Authority should consider the need for a higher provision of housing and additional allocations (in particular Candidate Site CS0250- Land at Evesham Nurseries) to accommodate the additional years for the plan period and the increased 20% flexibility.

Monmouthshire County Council (MCC) have noted that they consider that the Preferred Strategy meets the 'Tests of Soundness' and so is in general conformity with Future Wales 2040. According to the Planning and Compulsory Purchase Act 2004 and set out within National Planning Policy, there is a fundamental requirement for any Local Development Plan to be found sound. To ensure that this policy meets the tests of soundness and is justified, and effective, additional growth should be allocated across the remainder of the County to ensure the consistent delivery of dwellings across the Draft LDP period. To this end, Bellway consider the lack of deliverability of certain housing allocations results in the RLDP being unsound as it fails the Council's own Test of Soundness in respect of:

- Test 2 the housing allocations in the southern part of the county are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales (PPW).
- Test 3 in the housing allocations, namely East Abergavenny, will not deliver to allow the LDP to deal with the housing requirement to meet local needs throughout the County.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	Support
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S2 seeks to focus new development on the primary settlements of Abergavenny (including Llanfoist), Monmouthshire, Chepstow and Caldicot including the Severnside area. The Sustainable Settlement Appraisal (December 2022), which forms the evidence base of Policy S2, highlights the dominant role of the primary settlements, including Abergavenny/Llanfoist, and describes "*the relative self-containment of these settlements compared to other settlements within the County justifies their classification as Primary Settlements which can be maintained and strengthened through future sustainable development.*"

Bellway support the recognition of Abergavenny (inc Llanfoist) as a Primary Settlement and agrees that given the existing level of infrastructure in place it represents one of the most sustainable locations for future development in Monmouthshire. This is reflected in the fact of MCC's overall housing requirement around 1,362 homes shall be accommodated within Abergavenny, which is equivalent to 22% of the distributed residential growth for the RLDP.

However, Bellway consider that further review is given to the allocation of suitable, viable and deliverable sites rather than the reliance on a singular larger Strategic site Policy HA1- Land to the East of Abergavenny for 500 homes through the plan period. Full details of why the site is unsuitable for allocation is provided within Question 10.

Bellway consider that given the prominence of Abergavenny (inc Llanfoist) and to ensure deliverability, then smaller, developer led allocations should be provided for certainty in the trajectory. Bellway still maintain that some larger allocations (such as Abergavenny East) are unlikely to deliver in the early years of the trajectory, whereas Candidate Site CS0250- Land at Evesham Nurseries is more than capable of doing so. This is suggested alongside Bellway's consideration that the total requirement needs to increase (as per objections to Strategic policy SP1 above) but also to provide the required flexibility, range and choice, a number of smaller deliverable allocations would be appropriate.

To this end, Bellway are of the view that clear evidence has been provided to confirm that specifically Candidate Site CS0250 - Land at Evesham Nurseries can be allocated within Abergavenny (inc Llanfoist), under Policy S2 in accordance with the status of a Primary Settlement.

Whilst Bellway support Abergavenny (inc Llanfoist) as a Primary Settlement and appropriate location for development, Bellway consider the lack of deliverability of certain housing allocations within in the Plan's spatial strategy result in the RLDP being unsound as it fails the Council's own Test of Soundness in respect of:

- Test 3 in the housing allocations, namely East Abergavenny, will not deliver to allow the LDP to deal with the housing requirement to meet local needs throughout the County.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Whilst Bellway have no specific comments in relation to the requirements of Policy OC1- New built development in the Open Countryside, there is comment in regard to the Settlement Boundary Review which facilitates the above policy.

In particular Bellway raise significant concern given the guiding principles used to provide a consistent approach to the review of the settlement boundaries, which included the fact that '*Isolated or sporadic development, which is clearly detached from the settlements should, however, be excluded from the boundary'.*

In this regard Bellway object to the boundary changes proposed at 151- Land to the East of Abergavenny (adjusted boundary to include Residential Allocation HA1). This boundary changes, despite being done so to allow for the proposed allocation, is clearly detached from the settlements. In particular, Land to the East of Abergavenny results in an incongruous settlement boundary which is clearly separated from Abergavenny by the A465 and railway line. Bellway consider that Candidate Site CS0250- Land at Evesham Nurseries is a much more logical infill development clearly related to the settlement boundary and without constraint.

Bellway objects to the settlement boundary amendment and consider that it fails the Council's own Test of Soundness in respect of:

- Test 3 in the housing allocations, namely East Abergavenny, will not deliver to allow the LDP to deal with the housing requirement to meet local needs throughout the County.

- Bellway have no comments on Policy GW1 – Green Wedge Designations

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Bellway broadly agree with the wording and thrust of emerging Strategic Policy S3 – Sustainable Placemaking & High Quality Design and Policy PM1 – Creating well-designed places. Bellway consider that Candidate Site CS0250 (Land at Evesham Nurseries) would accommodate the principles of both policies within the Candidate Site presenting an opportunity for a logical continuation of existing and planned residential development in Monmouthshire.

The Candidate Site is located within a sustainable location close to a number of facilities and good transport links. Furthermore, an indicative masterplan has been prepared by Urban Design Box architects illustrating the site accommodating up to 105 dwellings, open space, play space provision, landscaping, and associated infrastructure. This scheme would deliver new family homes, including affordable properties, of a high standard of design and construction enabling an enhanced residential amenity whilst increasing the opportunities for home ownership in the local area.

- Bellway have no comments on Policy PM2– Environmental Amenity
- Bellway have no comments on Policy PM3 – Advertisements
- Bellway have no comments on Policy HE1 – Conservation Areas
- Bellway have no comments on Policy HE2 – Design of Shop Fronts in Conservation Areas
- Bellway have no comments on Policy HE3 – Roman Town of Caerwent

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	Support
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S4 – Climate Change, sets out a range of measures and criteria for developments to address the cause of and adapt to the impacts of climate change. In principle, Bellway wishes to work to help contribute towards MCC's Climate and Decarbonisation Strategy and Action Plan, which sets out broad objectives and actions to deliver a net reduction in carbon emissions to net zero by 2030 and address the water issues in the County.

Sustainability is at the heart of each and every scheme that Bellway designs and delivers. This is demonstrated through the use of sustainable modes of transport, sustainability within the design of buildings, or indeed the actual proportions of Green & Blue Infrastructure. This is demonstrated in the indicative masterplan prepared by Urban Design Box architects illustrating that Candidate Site CS0250- Land at Evesham Nurseries can accommodate up to 105 dwellings, open space, play space provision, landscaping, and associated infrastructure.

In terms of specifics within Strategic Policy S4, Bellway support the prioritisation of fabric first as per criteria (ii), and also notes that criteria (iv) requests developments to utilise sustainable construction techniques and local supplies through the adoption of the circular economy principles where possible.

Bellway fully supports emerging policies seeking to tackle climate change with proactive sustainable measures. However, policies must be sufficiently flexible and fit for purpose and factor in the viability appraisal of proposed planning policies. The proposed policy, however, should be flexible to allow developers to utilise the most appropriate technology available at that time, whilst national policy is finalised. It is therefore considered that the 'where possible' is an important addition.

Bellway do not dispute the Council's climate change emergency declaration and agree that there is a need for new development to contribute to significant reductions in CO2 emissions. Bellway raise concerns, however, whether this policy requirement is supported by a relevant evidence base and appropriate viability assumptions to ensure it is justified and meets the test of soundness.

Whilst Bellway recognise the proposed ambition of Policy NZ1, it is noted that Future Housing Standards (FHS) is due to be implemented in 2025 aiming to eliminate dwellings' reliance on fossil fuels, instead using low carbon energy sources, such as heat pumps and other renewables. Bellway will clearly comply with these regulations and national requirements, and question the need to currently step beyond the FHS.

Furthermore, Bellway highlight how applying NZ1 to all housing allocations is inconsistent with paragraph 5.8.5 of Planning Policy Wales, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. Bellway consider that the scope of Policy NZ1 needs to be both amended to align it with national guidance, whilst also reflecting FHS.

Bellway consider that Policy CC1 – Sustainable Drainage Systems is not specifically required as it is a repetition of requirements set out within the Flood and Water Management Act 2010. Furthermore, Bellway consider that the way the policy is currently worded is inaccurate with the assumption that all development requires Sustainable Drainage Systems. Only at supporting paragraph 9.3.7 is it clarified that SuDs drainage proposals are required for all new development over 100 m2 of construction area.

However, Bellway also note that the policy is seeking to extend beyond the requirement of the Flood and Water Management Act 2010 at supporting paragraph 9.3.8 where is it stated that '*regardless of size, there will still be an expectation that sustainable drainage methods are incorporated into a scheme where practicable. Policy CC1 therefore, seeks to ensure that development below the SAB size threshold noted above also implement the effective management of surface water drainage through SuDS features'*. Bellway consider that the policy is either removed or reworded to reflect the legislative requirements.

- Bellway have no comments on Policy CC2 – Renewable Energy Allocation
- Bellway have no comments on Policy CC3 – Renewable Energy Generation

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

Bellway support the principle of Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery, though note that criteria outlined for development proposals needs to be assessed on an individual basis, as in some instance they may not be appropriate or viable.

Again, Bellway agree in principle with Policy GI1 – Green Infrastructure and in particular that a GI Statement will be proportionate to the scale, nature and complexity of the development proposed. Bellway do question if the policy is required altogether as it a repetition of national planning policy – Planning Policy Wales (12th Ed 2024).

- Bellway have no comments on Policy GI2 – Trees, Woodland and Hedgerows
- Bellway have no comments on Policy LC1 – Landscape Character
- Bellway have no comments on Policy LC2 – Blaenavon Industrial Landscape World Heritage Site
- Bellway have no comments on Policy LC3 – Bannau Brycheiniog National Park
- Bellway have no comments on Policy LC4 – Wye Valley National Landscape (AONB)
- Bellway have no comments on Policy LC5 – Dark Skies and Lighting
- Bellway have no comments on Policy NR1 – Nature Recovery and Geodiversity
- Bellway have no comments on Policy NR2 – Severn Estuary Recreational Pressure
- Bellway have no comments on Policy NR3 – Protection of Water Sources and the Water Environment
- Bellway have no comments on Policy PROW1 – Public Rights of Way

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Bellway object to Strategic Policy S6 – Infrastructure as they do not consider it is required as physical, community and green/blue infrastructure will be assessed on an individual site basis and secured via legal agreements entered into under Section 106. Where specific

infrastructure is required for allocated sites then this information is most relevant in that policy.

- Bellway have no comments on Policy IN1– Telecommunication, broadband and other digital infrastructure

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	Support
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Strategic Policy S7 outlines the affordable homes target for the Plan period of 2018 – 2033 is 1,595 – 2,000 homes and that on-site provision of 50% affordable homes is required on all new site allocations and sites of 20 homes and over within existing settlement boundaries as identified in Tiers 1-3.

In response to above, Bellway acknowledge the County's affordable housing requirement and are more than willing to collaboratively work with the Council to help meet this need. In previous representations Bellway highlighted that the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments in accordance with Paragraph 4.2.31 of PPW which states, *'when setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.'*

Bellway note that viability information has been submitted in the evidence base in relation to proposed allocations and cannot disagree with the information provided by developers/landowners. However, as previously noted, it is envisaged that the delivery of 50% affordable homes on larger scale new allocations, such as East Abergavenny, will require financial assistance from Welsh Government for it to be realistic.

To this end, Bellway still consider that, without the intervention of the Welsh Government, the affordable housing threshold of 50% will significantly impact site viability which runs the risk of residential sites becoming undeliverable. In particular, if the site at East Abergavenny fails to deliver then this is a significant (up to 250) affordable homes that will not be delivered. Therefore, Bellway recommend that smaller, deliverable allocations are provided, such as Candidate Site CS0250- Land at Evesham Nurseries.

Bellway support the identification of Monmouth as a Primary Settlement within Policy H1 – Residential Development in Primary and Secondary Settlements, though question the proposed Allocations at East Abergavenny and have concerns over the delivery in the current plan period.

Bellway agree with the requirement of Policy H8 – Housing Mix that developments should provide a range and mix of house types, tenure and size. However, concern is raised in relation to the supporting text at 12.10.5 which suggests that the Authority are engineering the housing mix, rather than allowing the market/developers knowledge to have influence. In particular concern is raised as *'Priority will be given to the provision of small to medium size homes of 3 bedrooms or fewer. Proposals that predominately consist of large detached market properties of 4 bedrooms or more will not be supported'*.

Bellway also raise concerns in regard to having to the timing of agreement of a supporting statement providing the proposed housing mix, as this will have site viability impacts.

- Bellway have no comments on Policy H9– Affordable Housing Exception Sites
- Bellway have no comments on Policy H2 – Residential Development in Main Rural Settlements
- Bellway have no comments on Policy H3 – Residential Development in Minor Rural Settlements
- Bellway have no comments on Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use
- Bellway have no comments on Policy H5 – Replacement Dwellings in the Open Countryside
- Bellway have no comments on Policy H6 – Extension of Rural Dwellings
- Bellway have no comments on Policy H7 – Specialist Housing
- Bellway have no comments on Strategic Policy S9 – Gypsy and Travellers
- Bellway have no comments on Policy GT1 – Gypsy, Traveller and Showpeople Sites

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	
	Objection:	Object

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, Bellway support Strategic Policy S8 – Site Allocation Placemaking Principles, though again highlight some further suggestions. The suggestions relate back to Question 9 and the provision of affordable housing, as well as the housing mix.

Policies HA1-HA18

Policies HA1 – HA18 set out the Council's residential site allocations which intend to meet Monmouthshire's housing requirement over the proposed plan period. According to the RLDP Bellway understand these sites have been identified to sustainably expand the Primary Settlements of Abergavenny, Caldicot, Chepstow and Monmouth. Whilst Bellway support the general approach adopted by MCC, concerns remain regarding the deliverability Policy HA1 – Land East of Abergavenny.

For completeness the site is discussed in further detail to highlight the risks associated with their continued inclusion as a proposed site allocation and in doing so MCC's ability to meet the housing needs of the local community over the emerging plan period.

Policy HA1- Land to the East of Abergavenny

Bellway object to the proposed site allocation of land east of Abergavenny and continue to maintain a number of concerns.

Whilst there is no dispute regarding Abergavenny (inc Llanfoist) being identified as a Primary Settlement within Strategic S2 Policy, Bellway are wholly unconvinced that the Abergavenny East Strategic site is viable or deliverable; both of which are essential considerations relative to the housing delivery for the next plan period.

Welsh Government's Development Plans Manual (DPM) Edition 3 clearly emphasises the need for local planning authority's to demonstrate deliverability of all proposed allocations. Given producing evidence to show all parties have entered into an agreement is a key part of the process. In this circumstance such information is unavailable. This brings into question whether the site meets the relevant criteria to be considered suitable, available and delivery in order to warrant inclusion within the RLDP.

In relation to the above, the allocation of Land East of Abergavenny has major implications on the robustness of the housing trajectory. No clear evidence has been provided to the Council to demonstrate that all landowners are in agreement for the site to be developed and there are no known developers on board.

Furthermore, in addition to the above, given the overall size, scale and geographic location of the site its progression is heavily dependent upon significant infrastructure improvements coming forward over the proposed plan period to be considered a sustainable location for growth. Given the complexities associated this type of development the practical difficulties can often impact the financial viability of any scheme and on occasions potentially prevent development from coming forward altogether.

Bellway consider that the allocation of Land East of Abergavenny has major implications on the robustness of the housing trajectory and will fail to deliver the suggested 70 no. compilations by 2028/29 , and instead will be pushed further back in the trajectory (if at all).

This is particularly concerning given the 500 homes within the Draft LDP period, which represents approximately 23% of the overall proposed housing allocations. Given the substantial level of housing proposed to be allocated, Bellway note there are major technical

constraints that render the proposal extremely challenging, namely the required infrastructure to support an allocation of this proposed size and location.

Given that Abergavenny East is located to the east of the A465 as well as the railway line, this provides significant barriers for pedestrians and cyclists to cross in order to reach the town centre and other facilities. The A465 is a busy road with high vehicle speeds and so the provision of an at-grade crossing would be difficult, particularly owing to the level differences on the western side of the A465. Moreover, the proposed settlement boundary alteration to facilitate the allocation results in an incongruous settlement pattern that is clearly detached from the Abergavenny. This is contrary to the Settlement Boundary Review which notes that the guiding principles used to provide a consistent approach to the review of the settlement boundaries, included the fact that '*Isolated or sporadic development, which is clearly detached from the settlements should, however, be excluded from the boundary'*.

Furthermore, the existing pedestrian network in the eastern part of Abergavenny is substandard and it is recognised by MCC that significant improvements are required. However, what is wholly unclear is whether the improvements are feasible given the surrounding constraints and built up nature.

It is also evidenced that the walking distances to the town centre and other local facilities is greater than that identified in current guidance and will not conform to the 20-minute neighbourhood concept advocated in the RLDP. Given this, the site area cannot realistically be described as being accessible on foot even if the A465 and railway line can be safely crossed.

To overcome these constraints, the only solution would be providing a sustainable transport connection across the A465 and railway line. The significance of this has been stated publicly on numerous occasions and was a point of contention at the Cabinet Committee regarding the publications and consultation on the deposit Plan.

However, as far as Bellway are aware, there has been no reasonable feasibility work to confirm the costs nor that the infrastructure works are deliverable, without which the site should not be taken forward. Even if such funds were available, there are numerous operational issues that will need to be resolved which have significant implications for the housing trajectory and questions are raised over the amount of deliverable dwellings within the plan period.

Moreover, the traffic impact of the proposed urban extension is unknown, and without a detailed evidence base the allocation, and any mitigation – such as the proposed strategy to provide a direct bus connection to/from the site area – remains unjustified.

On this basis, the inclusion of Abergavenny East would result in the RLDP being unsound as it would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed above, the proposed allocation will not deliver, and it is not realistic or appropriate and is not founded on a robust and credible evidence base. As such, land east of Abergavenny should not be taken forward as a viable option.

Rather, there should be a number of smaller proposed allocated sites (100-200 homes) within the primary settlement which are developer led and deliverable, in order to provide a

higher level of certainly for the housing trajectory. In this regard, Bellway consider that the land at Llanfoist would be wholly appropriate.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comments on Strategic Policy S10 – Employment Sites Provision
- Bellway have no comments on Policy E1 – Protection of Existing Employment Land
- Bellway have no comments on Policy E2 – Non-Allocated Employment Sites
- Bellway have no comments on Strategic Policy S11 – Rural Economy
- Bellway have no comments on Policy RE1 –Secondary and Main Rural Settlements Employment Exceptions
- Bellway have no comments on Policy RE2 – The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use
- Bellway have no comments on Policy RE3 – Agricultural Diversification
- Bellway have no comments on Policy RE4 – New Agricultural and Forestry Buildings
- Bellway have no comments on Policy RE5 – Intensive Livestock / Free Range Poultry Units
- Bellway have no comments on Policy RE6 – Provision of Recreation and Leisure Facilities in the Open Countryside

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comments on Policy EA1 – Employment Allocations
- Bellway have no comments on Policy EA2 – Protected Employment Sites

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comments on Strategic Policy S12 – Visitor Economy
- Bellway have no comments on Policy T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside
- Bellway have no comments on Policy T2 – Protection of existing tourism facilities

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Bellway supports in principle the objectives associated with Strategic Policy 13- Sustainable Transport, which sets a requirement for all development proposals to accord with the Sustainable Transport Hierarchy set out within PPW12 and Llwybr Newydd: Wales' Transport Strategy 2021. The basis of which has been informed by national planning guidance and looks to place greater emphasis on development being located and designed in a way which reduces the need for people to travel and the existing reliance on private vehicles.

Moreover, Llanfoist benefits from good access to a range of local facilities and services within the Primary Settlement of Abergavenny (700m to the north-east). The Candidate Site CS0250 - Land at Evesham Nurseries also benefits from good transport links by rail, bus and road as evidenced in the accompanying Highways Technical Note prepared by Ardent Consulting Engineers. This note demonstrates the site's potential to provide improved accessibility for active travel through key pedestrian and cycle connections with the surrounding routes including National Cycle Network alongside the site's current connections with the public transport network. The Candidate Site is located within a sustainable location close to a number of facilities and good transport links and demonstrates that the site is highly accessible by activity travel means.

Bellway recognises the value of maximising opportunities for active travel throughout all aspects of Candidate Site CS0250. For success over the lifetime of the development it is important the proposed routes focus on connecting the site with key services and facilities located within the surrounding area of Abergavenny (inc Llanfoist) which is identified as a Primary Settlement. These principles are clearly illustrated within the accompanying Concept Masterplan, prepared by Urban Design Box architects, reinforces the fact that Land at Evesham Nurseries, Llanfoist is inherently well connected to a range of local facilities including schools, convenience stores, health care and modes of public transport. In turn the latter provides direct access to locations throughout Abergavenny and further afield thereby promoting a more sustainable pattern of development.

- Bellway have no comments on Policy ST1- Sustainable Transport Proposals
- Bellway have no comments on Policy ST2 – Highway Hierarchy
- Bellway have no comments on Policy- ST3 Freight

- Bellway have no comments on Policy ST4 – Rear Access/Service Areas within Central Shopping and Commercial Areas
- Bellway have no comments on Policy ST5- Transport Schemes
- Bellway have no comments on Policy ST6 – Protection of Redundant Routes

15.	Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comments on Strategic Policy S14- Town, Local and Neighbourhood Centres
- Bellway have no comments on Policy RC1 – Central Shopping and Commercial Areas
- Bellway have no comments on Policy RC2 – Primary Shopping Frontages
- Bellway have no comments on Policy RC3 – Local Centres and Neighbourhood Centres/Shops
  Bellway have no comments on Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comments on Strategic Policy S15 – Community and Recreation Facilities
- Bellway have no comments on Policy CI1 – Retention of Existing Community Facilities
- Bellway have no comments on Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas
  Bellway have no comments on Policy CI3 – Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing
- Bellway have no comments on Policy CI4 – Areas of Amenity Importance

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

- Bellway have no comment on Policy S16 – Sustainable Minerals Management to Safeguarding known/potential land won sand and gravel, sandstone and limestone resources.
- Bellway have no comments on Policy M1 – Local Building and Walling Stone.
- Bellway have no comments on Policy M3 – Mineral Site Buffer Zones
- Bellway have no comments on Strategic Policy S17 – Sustainable Waste Management
- Bellway have no comments on Policy W1 – Waste Management Facilities
- Bellway have no comments on Policy W2 – Agricultural Land – Disposal of Inert Waste
- Bellway have no comments on Policy W3 – Identified Potential Waste Management Sites

18.	Do you have any other comments to make on the Deposit RLDP and/or supporting documents?	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Bellway are aware from the Candidate Site Assessment Report 2024 that Candidate Site (CS0250), Land at Evesham Nurseries is '*not allocated as there is sufficient and more suitable land available for residential development within the primary settlement of Abergavenny including Llanfoist to accommodate its housing need*'.

That said, Bellway also highlight that out of the candidate sites, saved for those proposed to be allocated, the site performed the best in terms of having no technical comments preventing its allocation, other than there are other sites available. In this regard, Bellway have outlined in Question 10 their significant concerns regarding Policy HA1 – Land East of Abergavenny, and subsequently how the site is not considered to be '*sufficient and more suitable land*' and that the numbers should be redistributed to more appropriate sites, such as Candidate Site (CS0250), Land at Evesham Nurseries.

As stated in our previous representations submitted, the Site at Land at Evesham Nurseries, Llanfoist is under control by Bellway Homes and is considered a logical and deliverable parcel for future residential development. The site is supported by extensive technical reports previously submitted which demonstrate the Site to be suitable, deliverable, and viable for a strategic allocation for residential development in Monmouthshire. The site is capable of delivering in the early stages of the trajectory and providing housing in the short term.

The Candidate Site forms a suitable location for sustainable development located on the western edge of Llanfoist that would create a new 'gateway' to the nearby Blaenavon World Heritage Site and a logical continuation of existing residential development in Llanfoist along Merthyr Road. To enhance this gateway, community facilities are proposed near the entrance of the site as identified on the concept masterplan. The Vision Document provides further information where a community café and agile working hub will be provided as part of a community hub for local residents that improves the leisure opportunities in Llanfoist. The facility would also service those using the car parking for leisure pursuits within the local area, where interpretation boards could be provided to educate people on the history of the Blaenavon World Heritage Site.

Moreover, Llanfoist benefits from good access to a range of local facilities and services within the Primary Settlement of Abergavenny (700m to the north-east). The Site also benefits from good transport links by rail, bus and road as evidenced in the accompanying Highways Technical Note prepared by Ardent Consulting Engineers. This note demonstrates the site's potential to provide improved accessibility for active travel through key pedestrian and cycle

connections with the surrounding routes including National Cycle Network alongside the site's current connections with the public transport network.

A Green Infrastructure strategy has been prepared that includes open space, planting, and linear green space to provide ecological corridors to encourage biodiversity throughout. As noted in the High-Level Assessment there is an area of surface water flood risk running through the centre of the site, however appropriate sustainable drainage features have been incorporated. The masterplan has sought to retain and protect boundary hedgerows and scattered trees through the offsetting of the development edge in addition to attenuation features for surface water runoff management. These attenuation basins sit alongside a network of attractively landscaped streets and spaces to accommodate and link the essential green infrastructure for the site.

It is also noteworthy that the Candidate Site is supported by an Initial Nutrient Assessment prepared by Brookbanks. However, Bellway are now aware of the proposed upgrades to the Llanfoist works and do not consider that phosphates are a barrier to the development of the site.

As detailed above, Abergavenny (inc Llanfoist) is identified as a Primary Settlement which has excellent road links, railways station (2km east of the site) and a range of frequent bus services connecting the settlement to the South Wales cities, Swansea, North Wales, the Midlands, and Manchester. The facilities and services within Abergavenny score well within the sustainability assessment as the town centre has a relatively large number and range of shops and restaurants, a theatre, cinema, and museum, and is a vibrant focus for the surrounding area.

That said, Bellway maintain that the inclusion of Abergavenny East would result in the RLDP being unsound as it would fail Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed in Question 10, the proposed allocation will not deliver, and it is not realistic or appropriate and is not founded on a robust and credible evidence base. As such, land east of Abergavenny should not be taken forward as a viable option.

Rather, there should be a number of smaller proposed allocated sites (100-200 homes) within the primary settlement which are developer led and deliverable, in order to provide a higher level of certainly for the housing trajectory. In this regard, Bellway consider that the Candidate Site (CS0250), Land at Evesham Nurseries would be wholly appropriate to assist in making the Plan sound.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	No
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? X	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations).

However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1745

Redi 205 Ltd

Planning & Development Consultants
Ymghynghorwyr Cynllunio a Datblygu

Date: 16th December 2024
Our Ref: 21.222

[redacted]

Tel: 029 2073 2652
www.asbriplanning.co.uk

Monmouthshire County Council
Planning Policy
County Hall
The Rhadyr
Usk
NP15 1GA

Dear Sir/Madam,

Monmouthshire Replacement Local Development Plan 2018-2033
Deposit Plan Consultation
Former MoD Site, Caerwent

Asbri Planning write in relation to the current consultation on the Monmouthshire Replacement Local Development Plan (RLDP) Deposit Plan (October, 2024), specifically in regard to the Former MoD Site, Caerwent.

Further to the promotion of the above site (Candidate Site Ref. CS009) on behalf of the Site Promoter (Redi 205 Ltd) as part of the RLDP preparation process, the inclusion of the land comprising the Former MoD Site, Caerwent, as a mixed-use residential allocation in the Deposit Plan is welcomed and supported.

The substantial submissions that have been made to the Local Authority since 2021 with regard to Candidate Site Ref. CS009 are not re-visited within this Deposit Plan representation, as the adequacy of these former submissions is reflected in the Authority's decision to allocate the site. However, a brief summary of the supporting assessment work that has been undertaken and informs the allocation (and will be supplemented as required in preparing the forthcoming Planning Application) is set out below:

- Landscape and Visual Appraisal
- Preliminary Ecological Appraisal
- Viability Appraisal
- Transport Technical Note
- Transport Assessment
- Archaeological and Heritage Assessment
- Tree Survey
- Energy Statement
- Outline Drainage Strategy
- Green Infrastructure Strategy

Summary of Deposit Plan Representation

Further to the extensive representations submitted by Asbri Planning on behalf of the Site Promoter in regard to the site over the course of the RLDP process to date, we wish to express support for the Deposit Plan as a whole, and specifically submit a representation of support in relation to the following Deposit Plan policies:

- Strategic Policy S10 – Employment Sites Provision
- Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy
- Policy EA1 – Employment Allocations (specifically Site Ref. EA1L: Land at Former MoD Site, Caerwent – which allocates the site for a minimum of 1 hectare of B1 use)
- Policy HA9 – Residential Allocations – Land at Former MOD, Caerwent (which allocates the site for a mixed use residential scheme comprising a total of 20 open market units, 20 affordable units, and a minimum of 1 hectare of B1 use)
- The Deposit Plan Proposals Map, and specifically the identified allocations (EA1L and HA9)

Strategic Policy S10 – Employment Sites Provision

As identified at previous stages of RLDP consultation (including the Growth and Spatial Options consultation and the Preferred Strategy), a key element of the RLDP strategy relates to the promotion of a growth level/spatial strategy that will promote higher employment growth, support greater labour force retention, and achieve a reduction in the net out-flow of workers. As such, the RLDP looks to enable the provision of up to 6,240 jobs over the Plan period (416 jobs per annum). The allocation of deliverable employment land will form a fundamental part of securing the level of local economic growth proposed. Strategic Policy S10 (Employment Sites Provision) is therefore supported, with the provision of 57ha of employment land (to meet a minimum requirement of 38ha) is considered appropriate if the proposed levels of economic growth are to be achieved.

The allocation of a minimum of 1 hectare of land for B1 use on the Former MoD Site presents a deliverable and viable employment allocation, which will assist the Local Authority in delivering high-quality purpose built B1 accommodation on a previously developed / highly sustainable site, where employment opportunities can be co-located alongside residential dwellings.

Policy EA1 – Employment Allocations

It has been clearly demonstrated through the extensive submissions made in relation to Candidate Site Ref. CS0009 (including the significant supporting survey and assessment work), that the Former MoD Site presents both a deliverable and viable mixed-use site, with the 1 hectare of employment space supporting the Local Authority in achieving the required level of employment growth over the Replacement Plan period.

In summary, the allocation of 1 hectare of B1 use on the Former MoD Site as designated under Policy EA1L is supported, and the Site Promoter's commitment to delivering the allocation in accordance with the phasing schedule outlined in the employment land trajectory at Appendix 10 of the Deposit Plan is reiterated.

Notwithstanding the above support, we would highlight in regard to the mix of uses included in the Deposit LDP allocation, that at earlier stages of the Candidate Sites process, it was identified that the site could support an element of C2 use (specifically care home provision, with a deliverable and viable

site layout prepared which incorporates C2 provision). The Site Promoter would maintain that a wider / more flexible designation (which allows for a mix of B1 and C2 uses, in addition to the residential element) remains viable, and would present a preferable option in terms of making the most efficient use of this sustainable/brownfield site. Although the Site Promoter would therefore object to the proposed mix of uses that have been allocated, it is reiterated that the Deposit allocation remains viable without the inclusion of the care home element.

Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy

We wish to support the Deposit Plan's overarching strategy in relation to the spatial distribution of development across Monmouthshire. It is considered that the settlement hierarchy identified in Policy S2, which seeks to focus new development in the primary settlements of Abergavenny, Chepstow, Monmouth, and Caldicot (including the Severnside Area and specifically Caerwent), is entirely appropriate and will allow for the delivery of sustainable and resilient communities.

With regards to the spatial distribution of development, it is acknowledged within the Deposit Plan that in light of the County's high landscape and agricultural land quality, it is necessary to identify allocations that are the best connected, most sustainable, best able to deliver placemaking and are least harmful. The Former MoD Site comprises vacant, unused, brownfield land. It therefore presents the Authority with the only RLDP housing allocation which is able to reuse an entirely previously developed site, in a sustainable location that accords with the RLDP strategy.

Policy HA9 – Residential Allocations – Land at Former MOD, Caerwent

Based on the above, the inclusion of the Former MoD Site as a mixed-use residential allocation (as designated under Policy HA9 of the Deposit Plan and identified on the Deposit Plan Proposals Map) is welcomed and supported.

The detailed supporting information prepared in relation to the Former MoD site to date, including significant masterplanning work informed by substantial background surveys/assessments, has demonstrated that a sustainable and high-quality mixed-use scheme can be delivered, which responds to local character, landscape setting, and ecological sensitivities. Site HA9 represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. As set out above, although the Site Promoter supports the site allocation, it is considered that a broader mix of uses could be accommodated, so as to ensure the most efficient use of this brownfield site (potentially including C2 use as outlined above).

Conclusion

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to Candidate Site Ref. CS0009 since 2021 onwards, the inclusion of the Former MoD site as a mixed-use residential and commercial B1 allocation fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness.

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions in relation to Policy EA1 (Employment Allocations) and Policy HA9 – Residential Allocations (Land at Former MOD, Caerwent) specifically.

Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.



Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Redi 205 Ltd	Asbri Planning
Address:	c/o Agent	[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to attached Cover Letter for full details of representation.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

N/A

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to attached Cover Letter for full details of representation.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	X
	Objection:	X
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. **Please refer to attached Cover Letter for full details of representation.**		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	X
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to attached Cover Letter for full details of representation.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

N/A

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to attached Cover Letter for full details of representation.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	X
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area ☐	Fails Test 3: Will the Plan deliver ☐	

in light of the evidence)?	(is it likely to be effective)?
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):	

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	

If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1948

Edward Rogers

Archived: 14 March 2025 15:57:48
From: [redacted]
Mail received time: Mon, 16 Dec 2024 21:53:40
Sent: Mon, 16 Dec 2024 21:53:07
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Monmouthshire Deposit Plan Representation
Importance: Normal
Sensitivity: None
Attachments:
1e3a3bbb.jpeg; Representation-Form.docx; statement of representation_CS0234.pdf;

Dear Planning Policy,

We are pleased to submit our representation to the Monmouthshire Deposit Plan 2024.

As part of our information, we have included the following documents:

1. Deposit RLDP representation form
2. Statement of representation_CS0234

We look forward to your considered view and receiving information on the Examination. I would appreciate acknowledging this submission.

Any queries please let me know.

Regards,
[redacted]

--

[redacted]

Planning Director

Onyx Land Consulting Limited

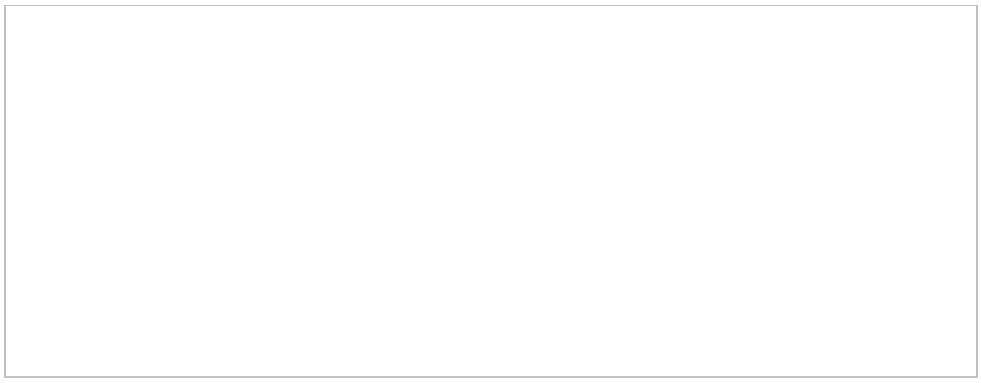
Planning and Development Consultancy

Monmouth | Cardiff | Bristol | Belfast

Mobile: [redacted]

[redacted]

www.onyxlandconsulting.co.uk



Dear Planning Policy Team
Monmouthshire Council

Monmouthshire Replacement Local Development (2018-23) Deposit Plan October 2024

1.1 We write on behalf of our client, Mr Edward Rogers in order to submit representations in respect of the **Monmouthshire Replacement Local Development (2018-23) Deposit Plan October 2024** that will guide development within the Council area. This Statement and its representations supplement those previously made to the Call for Sites (2021). Mr Rogers is a landowner with a land holding within the administrative boundaries of Trellech, a classified Main Rural settlement and has been engaged in promoting his land through various stages of the plan-making process. The site details are as follows:

Site Number: CS0234
Site Name: Land East of De Clere Way
Site Area: 0.37ha

1.2 Unlike our previous engagement, we find ourselves in a position of opposition and objection to the emerging plan, having previously supported the plan and its proposed inclusion of housing land East of De Clere Way, Trellech. We responded to the initial Call for Sites, which resulted in the site being included in the Candidate Sites Register but failed at the stage 3a/3b assessment. We must now object because of the unjustified and unwarranted action of the Council to not proceed to allocate the land and to seek to purge from its plan any reference to housing needs being met at Trellech as a Main Rural Settlement. It has done so without producing any evidence to support its actions and amendment to its plan, and we consider this to be unreasonable thus leaving the plan ineffective in meeting its spatial strategy, unjustified in its incomplete and partial evidence base and unsound.

1.3 We raise various concerns around inconsistencies within the policies and the Plan objectives, the lack of reasonable alternatives as well as the lack of alignment with Future Wales 2040 and Planning Policy Wales 2024 as the reasons for the Plan being unsound.

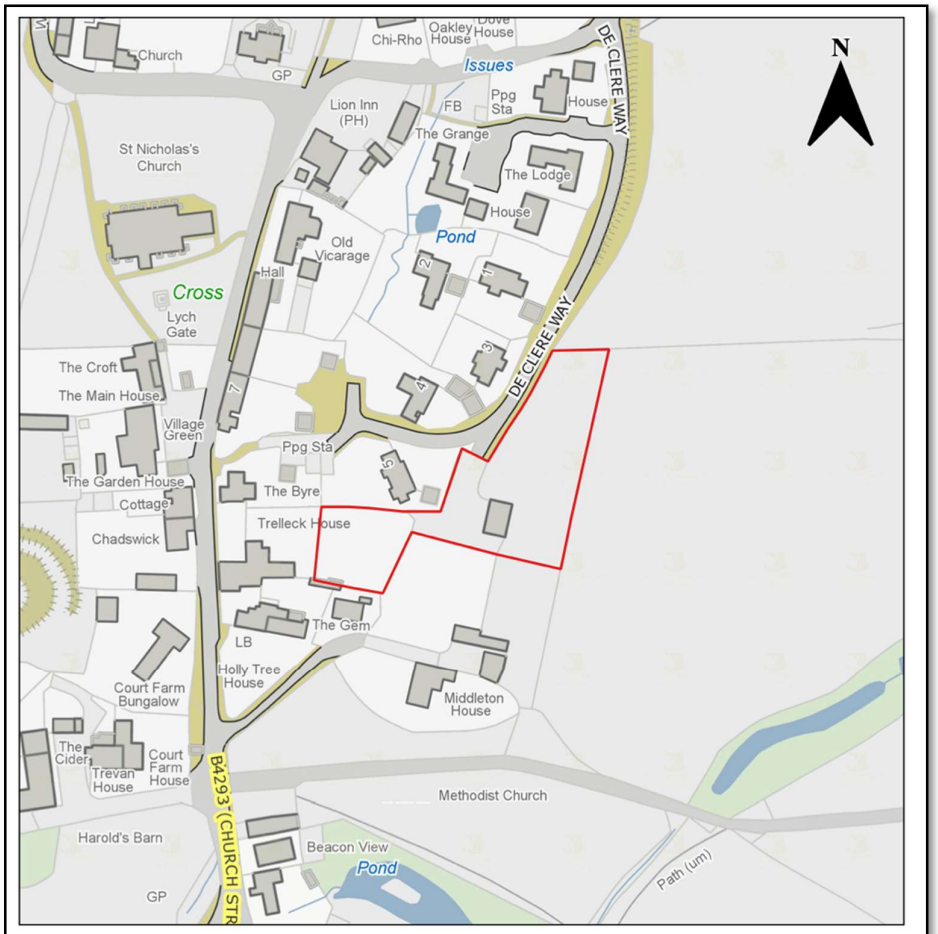
1.4 We set out the Statement to cover these three components (in no particular order):

- Legal compliance and duty to cooperate (part 1) matters related to the deletion of the allocation of Site and associated action, or inaction, of the Council
- Case for reinstatement of Site East of De Clere Way, Trellech as a housing allocation
- Matters of housing requirement and need for increased housing within the plan period and implications to provision of housing at Trellech, and Site CS0234

1.5 We go on to conclude that the plan is unsound and/or legally non-compliant as submitted, but that it is possible to make it sound and legally compliant by making main modifications to it. In these circumstances, the Inspector must recommend the necessary main modifications that would include the allocation of the Land East of De Clere Way.

Site Summary

1.6 To assist the Inspector and Examination we seek to provide site details of Land East of De Clere Way.



Candidate Site Number	CS0234
Site Name	Land east De Clere Way
Site Promoter	[redacted]
Settlement	Trellech
Ward	Mitchel Troy and Trellech United
Proposed Use	Residential
Site Size in Hectares	0.37 ha

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
	(c) Ordnance Survey 10023415 2021	Not to Scale

Figure 1: Candidate site CS0234 Land East of De Clere Way

Duty to Cooperate

1.7 The reason for failing to progress past Stage 3A/3B has been given as follows:

"Site not progressing as insufficient information has been submitted in relation to demonstrating deliverability in accordance with key policy requirements. In addition, there is no capacity at the Trellech WwTW to accommodate foul flows from the site. Therefore, the site will not be allocated in the RLDP."

1.8 We would argue that the Council has not reviewed, commissioned or produced any evidence relating to its stated significant concerns on the deliverability of the site. It provided no explanation of any part of its evidence base to the plan of how it has come to realise these concerns since the Candidate site's first stage assessment. Upon engaging with the Council at the late stage, we were advised that additional information in relation to viability evidence based on 50% affordable housing provision was sought. We consider the request for the Development Viability Model from a small site disproportionate and that the onus to establish the whole Plan viability lies with the Council and not with the developers or promoters.

1.9 With respect to the latter we understand the potential significant implications on the Trellech WwTW. The Council states that without an understanding of these impacts, it is not considered appropriate to make an allocation in Trellech. We understand that Trellech WwTW is a matter which is Natural Resource Wales (NRW) led and that the Council should normally seek to adhere to. However, the Council showed no awareness of this emerging situation which would potentially blight the growth prospects of many settlements. This contradicts the advice contained in para 3.40 in Planning Policy Wales (2024) which states, “Planning authorities should, in conjunction with key providers, take a strategic and long term approach towards the provision of infrastructure as part of plan making”.

1.10 Two potential issues arise: First we consider that the Council has failed in its duty to cooperate to take reasonable steps to engage with NRW and that it has simply responded to the new information without working actively towards mitigating its implications. The lack of these efforts leads to a question of whether the Plan is positively prepared or not.

1.11 Delivery of housing at Trellech is a matter of acute need. The evidence base shows as few as 25 homes have been built in the past 5 years. It is the Council’s own evidence through its Preferred Development Option to spatially distribute housing to main rural settlements, including Trellech in this Plan. The removal of the site from the candidate site register deprives Trellech of any new allocation ultimately undermining its growth prospects.

1.12 It is of significant concern that the actions to consider alternatives and mitigations of site constraints reduces the housing requirement eventually leading to a shortfall of housing supply and a failure to meet needs. Our view is allocation of Land east of De Clere Way continues to benefit from positive evidence in matters of settlement, site and sustainability. There is no negative evidence on matters of highway / transport matters to which the Council can substantiate its action to remove the allocation.

1.13 The plan is unsound, without justification or effective in meeting the objectives of the plan, its preferred development option and spatial strategy through the action to remove the site. The Council has failed to meet its duty to cooperate in preparing a justified, relevant and reviewed evidence base to a matter that came to light recently and in a positive manner. The allocation

of the site as modification to the Plan will serve to redress these fundamental problems on soundness. And we urge the Inspector to direct the Council to reinstate the allocation.

Spatial Strategy and Housing

1.14 Policy S2 refers to Spatial Strategy and Settlements, dealing with the promotion of locations for new development and where development will be limited. As per paragraph 6.4.7, the growth strategy in the Plan is underpinned by a settlement hierarchy, categorising the settlements in terms of their access to services and facilities. However, only 9% of new homes have been allocated across 10 rural settlements which makes the Plan unsound given these settlements need new investment in housing to make them remain sustainable and thriving communities.

1.15 It is noted that between 2018 and 2023, 177 new dwellings had been completed in rural settlements which averages 35 dwellings per annum. Making provision of 108 dwellings for the next 10 years would be equivalent to 10 dwellings or a third of what has been built out.

1.16 The Plan also has a greater reliance on windfall housing in rural settlements, which is unrealistic and cannot be relied upon for rural settlements with lack of deliverable sites. Whilst the Plan has a few strategic sites these sites are located in larger towns such as Abergavenny and Caldicot, the benefits of growth in these larger towns will not benefit smaller settlements.

1.17 We are cognizant of the elements of Policy S2 - Spatial strategy, which refer to the delivery of brownfield land as a priority. We are strongly of the view that such a focus is inappropriate and unsound given there is a clear lack of availability in respect of brownfield land to deliver sufficient housing.

1.18 We welcome the general thrust of the spatial strategy and Trellech being designated as a rural settlement. However, we consider that the Plan ignores the housing need in smaller settlements and the need for new investment in housing that is critical for the sustainability of villages and hamlets. The spatial strategy also overlooks the housing affordability issues in smaller settlements which are disproportionately higher than in bigger towns and cities. The above is reflected in objective 6 which sets out that the strategy has been given a brownfield focus, maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire.

“Objective 6 - People are living in inclusive, equal, safe, cohesive, prosperous and vibrant communities.”

1.19 We are of the view that there is too significant a gap between what is considered acceptable in principle in different settlement hierarchies. In a number of cases, smaller villages offer opportunities for the delivery of homes. Equally, it is contrary to Future Wales 2040, which looks to support the vitality of rural communities. As such, we are of the view that the approach contained within Draft Policy Strategic Policy S2 – Spatial Distribution of Development –Settlement Hierarchy is unevidenced and unsound. It is also not aligned to para 3.4 of Planning Policy Wales (2024) which states “Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be

designated by local authorities as the preferred locations for most new development including housing and employment provision."

1.20 With this in mind, we consider that the lack of housing allocation in Trellech and exclusion of the sustainable sites such as Land East of De Clere Way, which are essential to meeting the Council's housing targets, makes the plan unsound. We consider the housing provision in Trellech should be increased and that the Plan should allow additional sites to come forward at an appropriate time to ensure delivery at the site can be optimised. Without this, the plan is found unsound as it does not align with its own Objective 13 which states "To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy."

1.21 No new housing provision has been made in Trellech and on this basis we consider policy HA1- HA18 – Residential Site Allocations to be flawed and unsound.

Affordable Housing

1.22 Para 3.1.1 of the Plan states that Monmouthshire have the highest average house prices in Wales resulting in acute housing affordability problems. The Plan goes on to state that the Council has 2,064 households identified as being in need of affordable housing. We re-iterate our previous point on this policy - while we recognise there is an acute need for affordable housing, this must be balanced with viability and deliverability. If schemes are not viable, and subsequently deliverable, less development will come forward, consequently impacting affordable housing delivery. The correct balance needs to be struck to ensure developments are deliverable, which will in turn allow for the delivery of affordable housing. This is especially important in the context of the increased housing targets for both Districts and the Government's ambition to demonstrate delivery.

1.23 The 50% affordable housing target is restrictive as it will significantly impact the financial viability of schemes, potentially to a determinantal level where schemes can't come forward. This has been seen in Oxford City Council, who previously adopted a 50% affordable housing target in their Local Plan but are now proposing to reduce this to 40% to address viability concerns. Given the Consultation Plan administrative boundary typically sees lower values than Oxford City Council, we would suggest the affordable housing threshold should be no higher than in the current Local Plan to ensure deliverability of sites and to ensure the objectives of HOU1 can be met.

1.24 The current market, nationally, is already under strain as a result of high finance costs, build cost inflation and a relatively stagnant sales market, further cost pressures will likely stifle development. In any case, we welcome that affordable housing delivery is subject to viability.

Older Peoples' Housing

1.25 The 2021 Census identifies that nearly 26% of the population in Monmouthshire is over 65 (compared to 21% in Wales). The Plan is unsound as it significantly underprovides older persons housing. Rural settlements such as Trellech have higher proportion of older

population and by not identifying additional sites, the Plan seriously undermines the needs of the older people. By ignoring sustainable and deliverable sites such as our site 'Land East of De Clere Way' the Plan is found unsound and it should therefore be considered.

General Overarching Comments:

1.26 While we comment on the relevant sections of the document below, we would like to make a more general note regarding the recent publication of the NPPF in England and the recent government announcement to pursue housing growth in England, which applies to Wales as well given the widespread housing shortage and affordability issues. Monmouthshire adjoins 8 other local planning authority areas, out of which three are English Councils:

- Herefordshire Council
- Forest of Dean District Council
- South Gloucestershire Council.

1.27 Monmouthshire being a border authority must seek to respond not only to the housing crisis within the LPA area but also to the need arising from across the border.

Conclusion

1.28 The Council has not reasonably undertaken effective engagement with NRW to mitigate infrastructure issues in a manner expected by Planning Policy Wales.

1.29 There is absence of any evidence or intent to even raise the matter, less explore alternative eco-based solutions to bypass the issue of overloading the treatment plant. Failing to provide housing development at Trellech fails to deliver on the spatial strategy and preferred development option that outlying settlements should be supporting the strategy in meeting part of the identified housing need and being supported by new housing to contribute to longer term sustainability of local services and local business and promote local housing choice.

1.30 The Inspector is asked to reach the only available conclusion that the Council has failed in its Duty to Cooperate and find that the plan as submitted is not legally compliant. To make the plan sound we invite the Inspector to recommend a modification to allocate the Land east of De Clere Way given there is no evidential basis for its removal and that, as we set out elsewhere in our representation, its exclusion will not align with the spatial strategy of the Plan. In addition, two further points indicate that pressures on the deliverability of the plan would suggest the allocation in Trellech becomes increasingly important:

- The plan places undue reliance on housing delivery from windfall housing and brownfield land overall and in main rural settlements such as Trellech, which is not realistic given the lack of brownfield land in these locations.
- Windfall housing is reliant upon conversion/redevelopment of uses such as employment, which, while making gains in housing numbers would be detrimental to economic activities. Excessive reliance on windfall housing will therefore undermine the plan.

- In our view, this leaves the Council with no alternative except to consider the sustainable sites such as CS0234. To do otherwise is to undermine and contradict a number of plan objectives. As we set out above, we find significant failings in its preparation that mean the plan as submitted is not prepared on an effective, proportionate or justified evidence base.

1.31 We strongly ask you to seek to not only increase the housing targets, but also increase housing in smaller settlements where housing affordability issues are more pronounced. We therefore consider it imperative that Monmouth County Council prepare for this within the Deposit Plan to ensure it is adequately 'future-proofed' and can be considered 'sound' by the Inspectorate.

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:	[redacted]	[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)		Onyx Land Consulting
Address:		[redacted]
Telephone No:		[redacted]

Email:		

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	X
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Please see the attached statement of representation for details.		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	X
Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. Please see the attached statement of representation for details.		

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Allocate site CS0234 in Trellech.

Please see the attached statement of representation for details.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
	Support:	

Is your representation in support or objection?	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Object to policy H1 for excessive reliance on windfall and brownfield sites for rural settlements. Both are in short supply.

Please see the attached statement of representation for details.

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
	Support:	

Is your representation in support or objection?	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Object to the omission of CS0234 from allocation.

Please see the attached statement of representation for details.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	X
	No:	

If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?	
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? X	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? X
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? X	Fails Test 3: Will the Plan deliver (is it likely to be effective)? X

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The Plan is unsound as it does not allocate sustainable, available and deliverable sites in main rural settlements.

The Plan is unsound because it ignores the growth needs of Trellech and as a result fails to address housing supply and affordability issues.

The Plan is not legally compliant as it fails to make sufficient engagement with NRW in address the capacity of treatment plants.

Plan is unsound as it is not positively prepared.

Please see the attached statement of representation for details.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations).

However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

monmouthshire
sir fynwy

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

1965

Monmouthshire Housing Association (MHA) (GJPlanning)

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Monmouthshire Housing Association (MHA)	GJP
Address:	[redacted]	
Telephone No:		

Email:	[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the key issues, challenges, vision and objectives of the Deposit RLDP.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the Plan's Growth Strategy.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Plan's Spatial Strategy.		

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Managing Settlement Form policies in the Deposit RLDP.		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Plan's design and sustainable placemaking policies.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA object to the current wording of Policy NZ1. Please refer to the submitted representations for more detail.		

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the green infrastructure, landscape and nature recovery policies.		

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the infrastructure policies.		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the housing policies set out in the Deposit RLDP.		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA object to the current wording of Policy HA1 'Land to the East of Abergavenny' and suggest revisions accordingly. Please refer to the submitted representations for more detail.		

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the economic policies.		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the employment site allocations. Please refer to the submitted representations for further detail.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the visitor economic policies.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the sustainable transport policies.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

MHA object to the current wording of Policy RC4 'New Retail Proposals Outside of Identified and Local Town Centres' and suggest revisions accordingly. Please refer to the submitted representations for more detail.

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the community infrastructure and open space polices.

17.	Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the mineral and waste policies.

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA supports the overall aims and objectives of the Deposit Plan, however, have made comments and objections to the wording of specific policies within the plan, and suggest revisions accordingly. Please refer to the submitted representations for more detail.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	No
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area ✓	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ✓	

in light of the evidence)?	

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

MHA supports the overall aims and objectives of the Deposit Plan, however, have made comments and objections to the wording of specific policies within the plan, and suggest revisions accordingly. Please refer to the submitted representations for more detail.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	English

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the

Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

Planning & Development Consultancy

tel. [redacted]
mob.
email.
web. gjplanning.co.uk
address. Office 16, House 1,
2nd Floor, The Maltings East
Tyndall Street, Cardiff CF24 5EA

16th December 2024

fao. Monmouthshire County Council

address. Planning Policy
County Hall, The Rhadyr
Usk
NP15 1GA

Dear Sir / Madam

Monmouthshire Replacement LDP Deposit Plan – 2018-2033
LAND EAST OF A465, ABERGAVENNY (Policy HA1 – Land to the East of Abergavenny)

Please find enclosed, on behalf of, and under instruction from our client, Monmouthshire Housing Association, and the landowners, representations for consideration as part of Monmouthshire's RLDP Deposit Plan.

This submission comments on the Deposit Plan, and by association the candidate site promoted in the LDP Call for Candidate Sites for Land East of A465, Abergavenny (which forms a central part of the strategy).

The representations made herein are in support of, and make comments regarding, the provisions of the Deposit Plan itself, and the Strategic Site allocation proposed within the Plan – specifically Abergavenny East set out in within Strategic Policy S8 (Site Allocations Placemaking Principles) and Policy HA1 (Land to the East of Abergavenny).

Considerable, and detailed, submissions have been made to-date in conjunction with discussions with the Local Authority, and other statutory bodies to promote and confirm the unequivocal deliverability of this site as set out in the proposed trajectory of the Deposit LDP.

The site has also been subject to an extensive and independent viability assessment which confirms the site is deliverable, taking into account likely 'opening up costs', planning obligations likely to be levied, and other infrastructure and general build costs taking into account current circumstances.

To support all of this, and as agreed with the Local Authority, despite the comprehensive submission of material and illustrative material provided to-date as part of the emerging plan process, the site promoter is preparing, through the design-team, an appropriate supporting formal layout to support the examination process and pre-application process to:

a) Confirm SUDS / SAB requirements are accommodated;
b) confirm placemaking requirements of PPW12 and Future Wales Plan; and
c) confirm the above matters do not impact the proposed quantum as part of the allocation – thus not undermining the allocation or its intended yield.

In terms of timings and trajectories, this is fully supported, and the intention to engage formally with the Local Authority through formal pre-application dialogue in earnest to support the delivery of this site remains. Ensuring that the scheme meets placemaking, Green Infrastructure and Suds requirements, which are key considerations. All of this can form part of the LDP Examination process in conjunction with the pre-application process.

In summary, these representations fully support the Deposit Plan as a whole, but wish to make comments on the policy provisions of the Plan itself. This is expanded in greater detail in the following sections.

1. RLDP SITE-SPECIFIC POLICY WORDING

The currently proposed wording of policies '*Site Allocation Placemaking Principles (Policy S8)'* and '*Land to the East of Abergavenny (Policy HA1)'* is worded below in italics. Whilst the strategic site is not yet subject to formal pre-application dialogue or planning application with the Local Authority, it is expected to be in the short term (in order to support deliverability, and engage early with the Local Authority to ensure the comprehensive dialogue takes place with all stakeholders). As a result, there are likely to be areas and aspects of the plan and its context which require flexibility to be built in.

As a result, it is considered that policy wording needs to adopt a flexible approach, whist still requiring the same output and principles to be met in meeting the policy requirements. Specifically, the policy wording uses the term 'must' in setting out the requirements of the overall policies, however, it is considered that this could and may well create inflexibility at planning application stage. Accordingly, we object to aspects of the current wording of the policy, and consider that an alternative approach / provision would be more appropriate and justified. As such, the use of the term 'should' is considered more appropriate, which is equally expecting in terms of what is expected as part of the policy provision, but not as definitive or absolute.

For ease, 'tracked changes' comments are provided in red text to outline where appropriate wording to policy text should be amended to improve flexibility to the policy wording. There is further text, in green, whereby our (GJP) considerations are added owing to a suggested change. It is considered these amendments will not undermine or materially affect the policy requirements, rather, allow a degree of interpretation by the applicant and decision-maker (The Local Authority), not least to reflect prevailing circumstances at the relevant time.

Policy Wording of Strategic Policy S8 – Site Allocation Placemaking Principles

"All residential site allocations ~~must~~ should comply with and incorporate the following placemaking principles into the schemes:

Sustainable Communities

- *Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location. Where appropriate, the layout will identify and respect key views to and from the wider landscape setting.*
- *Provision of 50% affordable homes on-site comprising a mix of housing types and tenures to meet local need.*
- *Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points.*
- *Provide a mix of house types, tenures, sizes, materials and colour to be developed at an appropriate density.*
- *Broadband /digital infrastructure ~~must~~ should be provided to serve each new home.*

Green Infrastructure, Landscape and Nature Recovery

- *Make provision within the development for appropriate green infrastructure, multifunctional streetscapes and useable public open space in accordance with National Policy and agreed standards, including play and recreation provision, community growing opportunities and accessibility for all.*
- *Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualifies and sensitivities of the area.*
- *Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.*
- *Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.*

- *Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.*

Sustainable Travel and Highways

- *Design of the site and its connections ~~must~~ should prioritise active travel to local trip attractors and public transport, in line with the Sustainable Transport Hierarchy (PPW12/Wales Transport Strategy). Active Travel Act guidance should be applied to routes, facilities and sustainable transport promotion.*
- *Sites ~~must~~ should provide for, and / or, contribute to active travel and public transport improvements as necessary.*
- *Ensure that the development does not adversely affect the safety, capacity and operation of the highway network.*
- *Streets ~~must~~ should, where appropriate, be designed and built to adoption standards in accordance with national and local design standards and offered for adoption pursuant to the requisite highway adoption agreements.*

Education Requirements

- *Sites ~~must~~ should provide for, and / or, contribute to primary and secondary school provision in the area in accordance with capacity requirements.*

Residential amenity

- *Ensure a safe, secure, pleasant and accessible environment for all members of the community.*
- *Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties.*
- *Incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate.*
- *Incorporate good acoustic design which ~~must~~ should be compatible with thermal comfort by ensuring adequate ventilation and avoidance of overheating, in the interests of protecting residents from the harmful effects of noise.*

Flood Risk and Sustainable Drainage Systems

- *Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with national planning policy.*
- *The development ~~must~~ should manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. The distribution of SuDS features across the site should be prioritised. ~~reducing the size of any single SuDS feature.~~*

Policy Wording of Policy HA1 – Land to the East of Abergavenny

"Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

In addition to the Placemaking Principles identified in Policy S8, the site ~~must~~ should comply with the following:

Sustainable Communities

a) *To provide a residential-led mixed-use development containing the following key uses:*
   - *Approximately 500 homes* including 50% affordable homes.*
   - *A minimum 1 hectare of B1 Use Class uses.*
   - *A neighbourhood centre, the uses and scale of which to be agreed by MCC.*

- *Green infrastructure and open space provision, including allotments/community food growing spaces, incorporating the creation of focal points for the community.*
- *Park and ride facility serving Abergavenny Railway Station.*
- *Active travel connections with visible, prioritised routes to/from the site to the Railway Station and Abergavenny.*

b) *The completion of non-residential elements ~~must~~ should be delivered in line with an agreed phasing programme.*
c) *The site design and masterplanning should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.*
d) *Provision of an appropriate design response and interface between the western edge of the development and the A465 corridor that respects the importance of the visual connectivity between the site and existing settlement and is in keeping with the distinct character of Abergavenny.*
e) *A balanced approach to densifies should be provided that makes efficient use of land and reflects the character of Abergavenny while also respecting the character of the surrounding landscape.*
f) *Higher densities should be focussed on western and central locations and towards key attractors such as the mixed-use centre and Railway Station. Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny.*
g) *Densifies and layout should respect the changes in levels within the site.*

Green Infrastructure, Landscape, and Nature Recovery

h) *Site design and layout should include opportunities to capture views of the wider landscape including the Bannau Brycheiniog National Park (BBNP) and the Usk Valley.*
i) *Development ~~must~~ should ensure the retention and protection of substantial GI assets as far as possible, including retaining and enhancing tributaries of the River Gavenny.*
j) *Hedgerows along the site boundary should be retained with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors.*
k) *Any tree loss associated with the redesign of the A465 corridor ~~must~~ should be subject to appropriate compensatory planting.*

Sustainable Travel & Highways

l) *A connectivity strategy setting out the number, location, form and delivery of connectivity points between the site and existing settlement of Abergavenny will be agreed with the Local Planning Authority. The strategy will include changes to the character and environment of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line.*
m) *Off-site highway infrastructure improvements ~~must~~ should be delivered as necessary, having regard to requirements arising from the Transport Assessment and including:*
    - *An agreement with the Highway Authority for the proposed accesses and junction on to the A465.*
    - *Emergency secondary access on to Garth Road.*
n) *Make provision for good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including linkages to the local schools, Abergavenny town centre and bus transport services.*
o) *Incorporate and enhance the existing Public Right of Way footpaths as key connection routes running through the site linking up with wider Abergavenny and as a through route to the wider countryside.*
p) *Make provision for a bus link into the site design and, if necessary, a financial contribution towards improved public transport and bus frequency.*

Air Quality

q) *Incorporate satisfactory air quality measures for mitigating and/or reducing emissions.*

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application."

To re-cap, the proposed changes in red text are considered appropriate, and do not materially affect the overall requirements of the strategic policy.

Justification for Amendment

It is considered that, given the current wording of the text, any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text (as currently worded) would not be in accord with the policy, and by association the plan. This is as a result of the wording including the terms 'must' and 'required'. Greater flexibility is therefore required to be provided for in the text wording.

Whilst the emerging proposals for the site fully expect to deliver the principles and key elements of the emerging allocation, greater flexibility (or rather less absolute requirement) needs to be allowed for. This reflects the position that the proposals are continually emerging, and will continue to evolve as a result and product of the subsequent planning application process (and consultation responses to that). It is, for example, stated elsewhere in the Plan (para. 6.3.4) that "*Submitted viability assessments demonstrate at the time of publication that these sites are deliverable. However, it is recognised this could change in the future…".* This reflects the need to appraise the position as and when the schemes for each site are presented and assessed, and recognises that some changes may be necessary or merited, or even desirable.

The terms 'must' and 'required' accordingly have the potential to be inconsistent with this, and inadvertently frustrate. Failure to adjust the language and terminology of the Plan in these respects could have the ability to frustrate the delivery of key sites. Any such frustration would, given that the Plan's housing provision is based over 73% on the Strategic Sites, ultimately compromise the delivery and effectiveness of the Plan itself. This raises questions of soundness.

Moreover, policy wording 'should' rather than 'must' has been accepted and adapted into various policies for Swansea LDP (adopted 28th February 2019) and more recently, in the Bridgend LDP (adopted 13th March 2024). It is therefore acknowledged by previous Plans and Inspectors that this wording is appropriate and acceptable.

2. POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

It is considered that Policy NZ1 in the Deposit Plan is of relevance to the proposed site in respect of the residential housing proposed. It is noted that PPW states "*Our homes, businesses and communities need to be powered and heated by low carbon energy sources, which also includes reducing and optimising our use of energy within them. Use of non-renewable sources of energy will need to be curtailed if we are to meet our carbon reduction targets and international obligations on climate change."* (Para 5.0.2).

As such, it is considered that the principle of the inclusion of Policy NZ1 supports the Wales target as set out within the Net Zero Wales Carbon Budget 2 Plan and is the first of it's kind in Wales. However, it is considered that the proposed wording of the policy in its current form is unclear and requires clarification (i.e. on the proposed 'unit' of carbon and how this is measured).

In reviewing the proposed policy wording, some background research has been undertaken into other LDP policies (in England and Wales) which Policy NZ1 can be assessed against. As such, the follow extract is taken from the Climate Emergency Development Plan Document (February 2023) adopted by Cornwall Council which is considered to be relevant:

2b) **New Development – Residential**

Residential development proposals will be required to achieve Net Zero Carbon and submit an 'Energy Statement' that demonstrates how the proposal will achieve:

- Space heating demand less than 30kWh/m2/annum;
- Total energy consumption less than 40kWh/m2/annum; and
- On-site renewable generation to match the total energy consumption, with a preference for roof-mounted solar PV.

Where the use of onsite renewables to match total energy consumption is demonstrated to be not technically feasible (for example with apartments) or economically viable renewable energy generation should be maximised as much as possible; and/or connection m a d e to an existing or proposed low carbon district energy network; or where this is not possible the residual energy (the amount by which total energy demand exceeds the renewable energy generation) is to be offset by a contribution to Cornwall Council's Offset Fund.

Where economic viability or technical constraints prevent policy compliance, proposals should first and foremost strive to meet the space heating and total energy consumption thresholds. Proposals must then benefit as much as possible from renewable energy generation and/or connection to an existing or proposed low carbon district energy network. As a last resort, any residual energy is to be offset by a contribution to Cornwall Council's Offset Fund, as far as economic viability allows.

While this policy does not require the application of these standards to reserved matters applications that relate to outline planning permissions that predate the adoption of this climate Emergency DPD, developers are encouraged to apply these standards on a voluntary basis, where it is feasible to do so and not within breach of existing permissions.

Given the above, and that the policy was recently adopted last year by Cornwall Council, it is therefore suggested that Policy NZ1 is re-worded to the following:

"All new build residential development will be required to demonstrate compliance with the standards outlined below through the submission of ~~an appropriately detailed, RICS aligned operational~~ an energy assessment with any planning application resulting in the creation of 1 or more dwellings. Development proposals for new homes must demonstrate the following:

- *Space heating demand less than 25 kWh/m²/yr;*
- ~~*On-site renewable energy generation to deliver the greater of: - matching the annual regulated electricity demand of the development; or - generating at least 40 kWh/m²fp/yr;*~~
- *EPC A or equivalent in accordance with the current version of the National Calculation Methodology for assessing the energy performance of dwellings;*
- *New homes must not connect to the gas grid and all heating and hot water needs should be met by low carbon heating systems. No fossil fuel systems are to be used on-site;*
- *Ensure that developments are served by / cater for future technological developments such as electric vehicle charging ~~ULEV charging infrastructure must be provided to every dwelling~~.*

All developments must submit an as built performance survey ~~following construction and prior to occupation of the home/s~~ to demonstrate that they have been built to the applicable standards and minimise the 'performance gap.'"

Justification for Amendment

In principle, MHA are supportive of a policy regarding providing net zero carbon homes. The proposed wording of Policy NZ1 will require homes to be constructed to a higher standard than Part L 2022 (Appendix E). This is supported in principle given that all of MHA's land-led developments (since 2021) are already achieving Part L 2022 (Appendix E) as a minimum and have achieved +100 SAP on the most recent homes.

That said, there are some elements of the proposed Policy NZ1 which MHA seek to review and object to. These points are detailed below.

Energy Assessment

Firstly, it is noted that the first part of the policy specifies that a "*RICS aligned operational*" Energy Assessment must be submitted with any planning application. MHA object to the wording of this and would suggest that this element of

the policy should be removed. RICS do not allow the use of national calculation methodology in Whole Life Carbon Assessments - as referenced elsewhere in the policy wording. Whole life carbon refers to the carbon impacts over the entire life cycle of a built asset, from its construction through to its end of life. A Whole Life Carbon Assessment is the calculation and reporting of the quantity of carbon impacts expected throughout all life cycle stages of a project, but also includes an assessment of the potential benefits and loads occurring beyond the system boundary.

As such, the Whole Life Carbon Assessment for the Built Environment (1st July 2024) by RICS should be considered when reviewing the proposed wording of the policy and, instead, the Policy wording should be amended to require the submission of 'an Energy Assessment' instead.

Energy Generation

The space heating demand of less than 25kWh/m2/yr as set out in the first bullet point is considered acceptable - if using national calculation methodology. Moreover, the requirement for all new homes to comply with EPC A is also welcomed and supported.

However, MHA would object to the requirement of the policy for the requirement to generate at least 40kWh/m2/yr. this is because small houses or flats have smaller roofs, meaning that these areas may not be great enough to get enough solar panels on the roof. This would have a direct impact on the ability to generate this much energy. This part of the policy would be too restrictive for smaller new builds to meet and therefore should be removed accordingly, as it may prevent certain development / house types coming forward.

ULEV Charging Infrastructure

MHA recently made representations to Welsh Government on the Consultation regarding "Electric Vehicle Charging in Residential and Non-Residential Buildings" (November 2024). The consultation sought views on the draft amendments to Building Regulations in Wales. The draft amendments propose to mandate the provision of electric vehicle changepoints in new residential, non-residential buildings, and buildings undergoing major renovations, or material change in use, which have associated car parking.

Community Housing Cymru made representations on behalf of MHA to the consultation. The key points which were raised regarding the amendments were as follows – and are also considered relevant to the proposed wording of Policy NZ1:

- Affordability for social tenants – any electric charging would need to be reclaimed through the tenants' service charge which would be difficult for communal settings – and flatted schemes. Moreover, the principle of charging port for each property doesn't tally with the general lower car ownership / users for housing association schemes with Housing associations taking active measured steps to ensure that tenants do not need access to cars to live well;
- Ongoing maintenance – this requirement could create a challenge for management and maintenance – specifically challenges around electricity costs and affordability to tenants;
- Impact on delivery – this requirement could impact on delivery given the pressures on development and maintenance;
- Wider considerations:
    - Capacity of the grid;
    - Risk of charging points becoming obsolete;
    - Risk of unintended consequences and need for clear policies and exemptions for sites where developers can not feasibly implement these requirements; and
    - Impact on placemaking and design philosophy where sites are not suited to adding these requirements and a mandate to do so may compromise other aspects of the site such as communal green spaces, Active Travel design elements etc.

As such, and on this basis, MHA would suggest that the policy is re-worded to allow for further level of flexibility. The proposed change to the policy is suggested as follows:

"Ensure that developments are served by / cater for future technological developments such as electric vehicle charging".

In terms of providing evidence that a more flexible wording would be better suited, Policy SP5 – Sustainable Transport and Accessibility from the Bridgend LDP (recently adopted 13th March 2024) has been reviewed in terms of the requirement for EV charging. Criteria (9) of Policy SP5 sets out that: *"(9) Ensure that developments are served by appropriate parking provision, in accordance with the Council's parking guidance, including infrastructure which caters for future technological developments such as electric vehicle charging points, and circulation areas, including adequate road widths to allow access for service vehicles".*

MHA's preferred approach would be for consideration of an exemption to these proposals for social housing providers – which instead allows Housing Associations to install the cabling, ducting and termination points for 'passive' charging points as a more appropriate way to integrate EV charging over the course of the next 10 years.

Performance Survey

It is considered that final part of the proposed policy wording for Policy NZ1, which sets out a requirement for new developments to submit a Performance Survey prior to occupation is also too restrictive and needs further detailed consideration as to practicalities of introducing this as a new requirement. The speed of being able to deliver new homes is important, especially in respect of the affordable provision, which directly responds to the homelessness crisis and the current numbers waiting for new houses on the housing register. The SAP Assessment and Building Control compliance certificate are already available to the LPA as part of Building Control approval in order to demonstrate that houses have been built to the applicable standards. Therefore, any requirement for a performance survey to be submitted prior to occupation would not be necessary and, would only add further delay and further cost and time in discharging further conditions preventing occupation in a timely manner.

Interim Summary

Accordingly, MHA support the policy in principle, but consider that the wording of the policy should be amended to ensure that the requirements set out are capable of being adhered and to allow for flexibility in the implementation of the policy, to ensure that appropriate schemes can be delivered over the Plan period. The changes suggested are considered to be appropriate, and consistent with similar policies adopted elsewhere – for example Cornwall Council as outlined above.

3. POLICY EA1 - EMPLOYMENT ALLOCATION

As set out in the Deposit Plan, the site allocation and policy for Land East of A465, Abergavenny includes a provision of B1 employment use, and is expected to provide a minimum of 1ha within the site during the Plan period (to 2033). As set out in the Site Trajectory (Appendix 10 of the Deposit Plan), the site is expected to deliver the employment use / facilities over the 'long-term' phase of the Plan period (Ref. EA1k). The submitted masterplan identifies the location of any proposed B1 uses that are to be incorporated into the site - please refer to the below section 'Framework Masterplan' for further detail.

In principle, the inclusion of B1 uses on the site allocation is supported, in that it is commensurate with the long-term vision and objectives of this key strategic site in a Tier 1 Settlement to create and establish a well-balanced and cohesive community, that will boast a wide range of land uses and the creation of jobs. The site will assist in supporting the delivery of B1 facilities, and by association, contribute to the overall required provision identified that is needed to be delivered over the Plan period for Monmouthshire. Accordingly, the development of the site will not only yield much-needed affordable and market housing, but also provide long term employment prospects and opportunities,

which, in turn, will support and improve the economic prosperity of the area. Moreover, it will allow for the integration of new employment opportunities in a mixed-use development, that will support sustainable economic growth and a sustainable neighbourhood and community – adhering with placemaking guidelines in this process.

Given the site's inherent sustainable location, directly located adjacent to Abergavenny railway station (that offers travel to and from key settlements such as Cwmbran, Newport, Cardiff and Hereford), the site's integration of B1 uses represents a suitable proposal to promote and support sustainable travel in Abergavenny and Monmouthshire. Accordingly, the site is well-located to host such facilities in this location, and is therefore, in accordance with the Plan's Spatial Strategy.

On this basis, the site's allocation in the Plan for employment use is supported, and it will play a significant role in delivery employment uses to meet the identified need over the Plan period.

4. POLICY RC4 – NEW RETAIL PROPOSALS OUTSIDE OF IDENTIFIED AND LOCAL TOWN CENTRES

Policy RC4 outlines that proposals for retail outside of any identified and local town centres must be subject to meeting the criteria of the policy (a) – (f). Moreover, a Retail Impact Assessment, to determine if there are other suitable locations to accommodate the proposed retail use. It is noted that the second part of Policy RC4 states *"Retail Impact Assessments will be required for retail and commercial developments outside the centres identified in the retail and commercial hierarchy in Strategic Policy S10, the content of which should be proportionate to the potential impact of the proposed use"*.

In relation to Land East of Abergavenny (Policy HA1), this sets out that the site must incorporate the following sustainable communities requirement: *"A neighbourhood centre, the uses and scale of which to be agreed by MCC"*.

As shown in the Framework Masterplan, this Neighbourhood Centre will likely incorporate some element of retail floorspace, possibly in the form of a local convenience store, along with possible other A1 or A3 uses - which would make this area a 'hub' wording, for the community. The principle of retail use being included within the site is considered to be supported, along with this having the ability to support and enhance any sustainability within the site - and for existing residents living in close proximity to the site. Whilst the site will be well-connected to the town, it is considered that a small on-site facility would naturally promote walking as opposed to private vehicles – internalising trips within the site accordingly. Is it therefore considered that, by this very nature, any retail use proposed (depending on size and location) within the site is justified within this context. However, it is suggested that the wording of Policy HA1 could be made more specific on what uses which would be acceptable in this 'Neighbourhood Centre' in order to clarify the position in relation to the site adhering to Policy RC4.

Accordingly, on this basis, it is queried whether any retail proposals proposed within Land East of Abergavenny would be required to comply with criteria (a) – (f) in Policy RC4, and whether a Retail Impact Assessment would be necessary for any retail uses on the site - given that the Strategic Policy Policy HA1 already sets out that there is a 'Neighbourhood Centre' should be incorporated into the site. This suggests that an element of A1 use would be justified in light of the site's proposal, scale, nature and location, and would not warrant specific and additional assessment and justification accordingly.

5. FRAMEWORK MASTERPLAN

A Framework Masterplan has been developed and submitted as part of these representations for the proposed development of the strategic site. The masterplan brings together all of the necessary assessment work undertaken so far (e.g. drainage, biodiversity, transportation, landscape etc. work) that has been undertaken to inform the pertinent considerations of the site – in order to achieve a legible and well thought-out layout. Please find this Development Framework Masterplan attached at **Appendix A.**

The key parts of this are outlined in the Placemaking Booklet (attached at **Appendix B**):

- Up to 500 new homes in the Plan period (with 50% to be affordable) but with a capacity for more dwellings (which would delivered after Plan period)
- Highway infrastructure within the site and associated upgrades to the surrounding highway network;
- Strong legible pedestrian and cycle connections both within, and to key position outside the site;
- Provision of education;
- A number of public parks, open and play spaces including the creation of a Nature Area
- A 'Community Hub' of mixed-use land aiming to provide community courtyard and uses;
- Multifunctional Green and Blue Infrastructure throughout;
- A mixed-use area 'Station Quarter' to improve connectivity to the wider region via the existing train station.

Further supporting Plans for Abergavenny East are also submitted as part of these representations in relation to Density Framework, Land Use Framework and Movement Framework Plan at **Appendix C**.

Considerable dialogue and engagement has already taken place between each of the parties having an interest in the overall / wider strategic development area. A considerable number of meetings have already taken place to ensure arrangements and relationships are in place to promote the strategic development area collaboratively and comprehensively. The opportunity is being taken forward in partnership, and the necessary arrangements and commitments are in place in order to allow for, and ensure, the effective and co-ordinated promotion of the proposal. As demonstrated through the submission of the Development Framework Masterplan, significant masterplanning works have been undertaken to date. This has been prepared based on detailed site, context, and transport analysis, and engagement and consultation with MCC Officers and as well as Design Commission for Wales, Trunk Road Agency and Transport for Wales.

To ensure that all material considerations relevant to the proposals are covered, addressed, and thoroughly satisfied, all necessary technical assessment work has been commissioned and this will be discussed further with MCC and the relevant parties in due course.

6. TRAJECTORY

It is noted that the Deposit Plan includes a Housing Trajectory in Appendix 9, which comprises a Table of the Timing and Phasing of Allocations (2018 – 2033). MHA wish to express their support for the proposed housing trajectory (as identified in Table 1: Appendix 9) for the at the site. As set out in the trajectory, the site can, and will deliver the full housing allocation (500 units) within the Plan period.

To confirm, a lead-in time of 4 years has been built into the trajectory for the site, as opposed to 2 - 3 years, which will allow for sufficient time to obtain the relevant Outline and Reserved Matters applications to be submitted and approved. In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period.

Appendix 9: Housing Trajectory

Table 1: The Timing and Phasing of Allocations (2018-2033)

Settlement Tier	CS Ref	RLDP Policy Ref	Site Name	Total Site Capacity	Planning Application Details where applicable	Time lag to construction start in			Phasing of Development (2018-33) (Base Date 1st April 2024)																					
											Actual Completions							Estimated Completions												
						Time period for pre-application discussions/ PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions To Date	U/C (units also incl. in phasing)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mth	Units phased beyond the plan period
											1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9 mths	
Abergavenny (Tier 1)(Primary)	CS0213 & part CS0293	HA1	Land to the East of Abergavenny	500		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	70	90	90	90	90	70	0

Evidence has been provided through the previous extensive representations (including Candidate Sites representations in 2021 and representations to the Preferred Strategy in 2023), made to MCC through the LDP review process thus far to evidence the suitability and viability of the site. Through the course of the previous representations, the site promoter, MHA, has also provided appropriate supporting information, including a Viability Appraisal, and other assessment work. The submissions have demonstrated that the site is not only appropriately located within close association and connection to Abergavenny, but that it is deliverable in line with placemaking requirements and economically viable - all of which fully comply with Welsh Assembly Government and Council aspirations of creating cohesive new neighbourhoods as defined in PPW12 and Future Wales 2040. Moreover, as evidenced in the housing trajectory, the site is fully deliverable, in that it will yield the full allocation (500 homes) over the Plan period.

With regards to the representations submitted to date, these have demonstrated that the site is inherently suitable for residential development, which is acknowledged by MCC by virtue of the site's inclusion as a strategic housing allocation within the Deposit Plan. It is therefore considered prudent at this stage of the LDP review, and within this submission, to further highlight the deliverability of the site, whereby it can be brought forward for development in line with the timescales set out for the allocation.

It is therefore on this basis that it is considered that the housing trajectory for the site is robust, and has been comprehensively informed by the assessment work and discussions with MCC to-date. Moreover, it has been evidenced that the proposed development is wholly available and deliverable to yield its full allocation within the Plan period, and overall, contribute to the wider housing requirement in the Plan.

In support of the trajectory, it should also be noted that positive discussions have been held and are ongoing with MCC to bring the site forward for both an allocation and development, and the site promoter is actively seeking to enter into formal pre-application dialogue with the Council in early 2025. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an Outline planning application prior to the Examination stage of the RLDP review process (Autumn 2025).

Conclusion

The site at Land East of Abergavenny (Policy HA1) is inherently suitable, sustainable and deliverable, and will make a significant contribution to achieving and realising the housing needs of Monmouthshire and the Deposit Plan the allocation for the site is supported in principle, however, it is considered that proposed amendments to the precise wording and provisions of Policy S8, Policy HA1 and Policy NZ1 should be reviewed and incorporated, as suggested as outlined above.

In light of the above, and the enclosed, we trust that this is all sufficient and understandable at this stage and look forward to hearing from you as soon as possible with such confirmation. Should however you have any queries or require anything further then please do not hesitate to contact me.

Yours sincerely,

[redacted]

[redacted]
[redacted]
Geraint John Planning Ltd.

Enc:
Appendix A - Development Framework Masterplan
Appendix B - Placemaking Booklet
Appendix C – Other Supporting Plans

PLACEMAKING BOOKLET
VISION FOR ABERGAVENNY EAST

Vision for Abergavenny East

Abergavenny is considered a 'Gateway To Wales',

Unlocking the Land East of Abergavenny offers to opportunity to create a sustainable, vibrant mixed use neighbourhood destination with a distinct sense of place and identity.

The overarching vision for the site is to create a sustainable and resilient community that will leave a legacy.

Strategically located alongside the rail station, the site will provide convenient access to walking, cycling, bus, park & ride opportunities, offering infinite live-work-travel possibilities.

Families, entrepreneurs, and communities will come together and enjoy the benefits of both urban and rural living and a real sense of community.

Strategically located at the foot of one of the seven hills- Ysgyryd Fach, the site will offer attractive views, access to natural/semi-natural settings and offering a range of recreational opportunities.

A network of community spaces, greenways and parks will provide beautiful, welcoming space for residents, visitors and commuters to meet, access facilities and spend time.

1. **Locally focused, culturally diverse**
   Deliver a distinctive place of quality and variety, nestled below Ysgyrad Fach that encourages creativity, play and inspires.

2. **Sustainable living**
   Provide a range and choice of high-quality, efficiently designed mixed-tenure homes that support affordable, age friendly, inclusive living

3. **Mixed, vibrant and diverse**
   Incorporate a variety of mixed-uses and services that support artisan facilitating development and negate the need to travel far to meet daily needs.

4. **Respectful and resilient**
   Promote environmentally sustainable design that retains, enhances and extends the diversity of landscapes and sensitively assimilate the development to the hillside.

5. **Sustainable travel behaviours**
   Prioritise Strategic Transport Improvements that connect and enhance the strategic highway, public transport, walking and cycling network, changing travel behaviours.

6. **Connected and legible**
   Define a hierarchy of streets, spaces and places that is attractive, legible, supports linked trips and reduces car dependency.

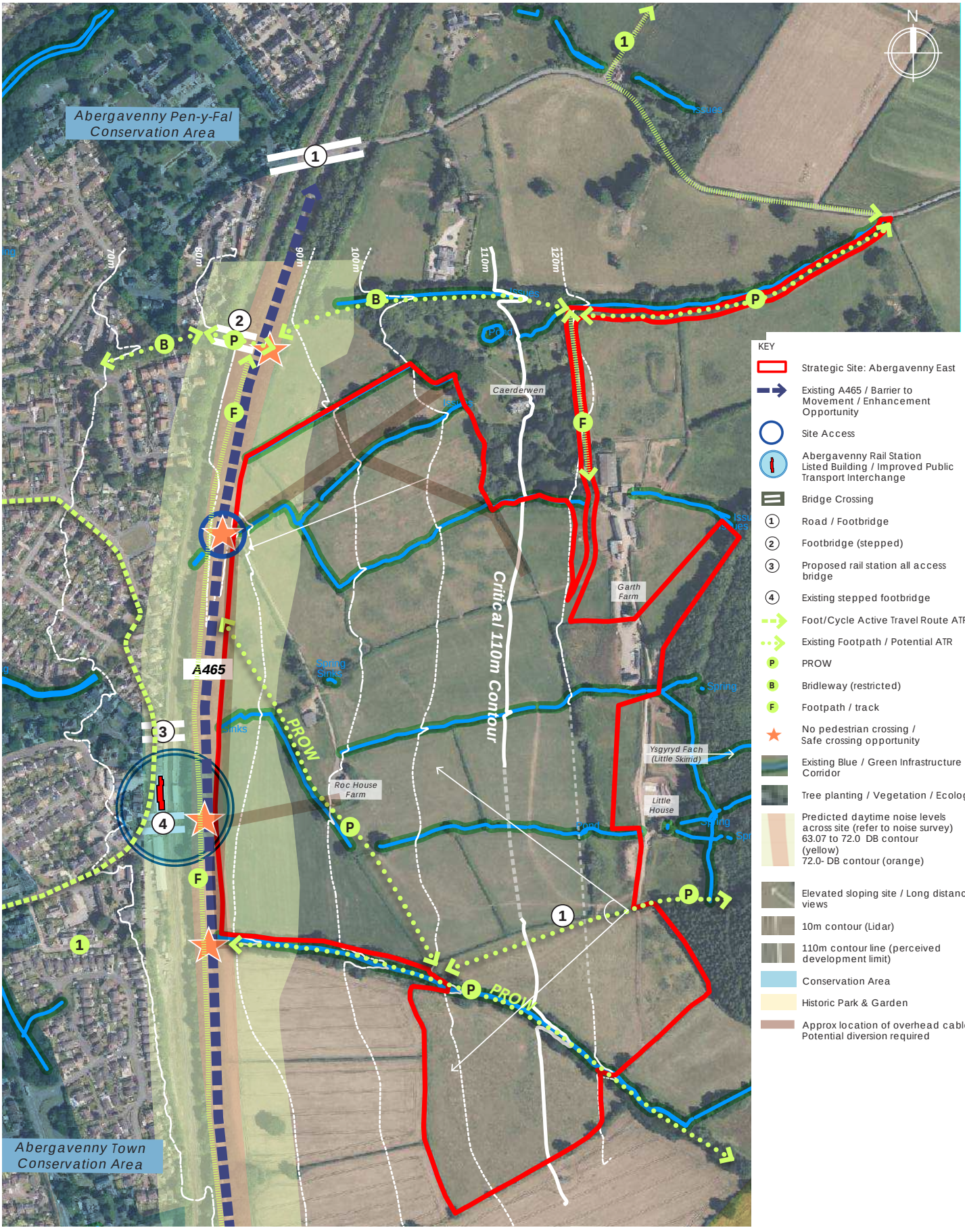
7. **Healthy lifestyles**
   Promote active, healthy lifestyles creating opportunities to spend time in nature, engage in physical recreation, play, and grow healthy food.

MHA

Core Objectives



CONSTRAINTS & OPPORTUNITIES



PLACEMAKING PRINCIPLES

Specifically, the development of this strategic site will promote the six DCFW Placemaking Charter principles as outlined below:

- **People and Community**
  The proposals consider and prioritise the needs, aspirations, health, and well-being of all people from the outset. A supply of housing that meets the needs of the present and future generations is proposed, well served by local facilities, and will encourage healthy inclusive and sustainable lifestyles. Going forward the development will involve stakeholders and the local community in the development of proposals.

- **Location**
  The flexible land use framework will allow the development to grow and develop in a way that uses land efficiently; supports and enhances existing places and is well connected. The location of the local centre, housing and other facilities are planned to help reduce the need to travel.

- **Movement**
  The development is located adjacent to Abergavenny Station and promotes the enhancement of existing infrastructure and connections that will prioritise walking, cycling and public transport use and avoid dependence on private vehicles. Well designed and safe active travel routes care proposed that will encourage active, sustainable travel.

- **Mix of use**
  The development incorporates a local centre and opportunities for community development, local business growth and access to jobs, services, and facilities, supporting a diverse community and vibrant public realm.

- **Public Realm**
  The development creates well defined, safe, and welcoming streets and public spaces and find a balance between movement, access, and character of place. Landscaping will soften the appearance of the street and create sociable, active environments. The development will protect and enhances the natural environment and pro-actively manages surface water drainage.

- **Identity**
  The vision for the site prioritises the importance of creating a positive, distinctive identity for the development that draws on the unique features and setting of the site. The ongoing design process will explore opportunities to incorporate heritage, culture, Welsh language, built and natural physical attributes in an engaging way. The development will incorporate a range of house and building types that have their own character but also complement and enhance the setting, helping to unify the development.

These principles have guided the creation of the masterplan framework, ensuring the delivery of an ambitious and integrated development that thoughtfully addresses the site's unique opportunities and constraints.

THE MASTERPLAN

The development of this strategic site will enable the delivery of up to 500 new homes within the Plan period, with 50% designated as affordable housing, alongside a neighbourhood centre providing mixed-use land, including B1 enterprise support. The site also has the capacity to accommodate additional dwellings beyond the Plan period.

The development will include highway infrastructure within the site, along with associated upgrades to the surrounding road network, designed to support environmentally responsible travel.

The plan prioritises strong, legible pedestrian and cycle connections both within the site and to key external locations, reducing reliance on car travel. Residents will benefit from a range of public parks, open spaces, and play areas.

Multifunctional green and blue infrastructure will promote biodiversity and sustainable water management, while a station link will enhance connectivity to the wider region, encouraging the use of public transportation.

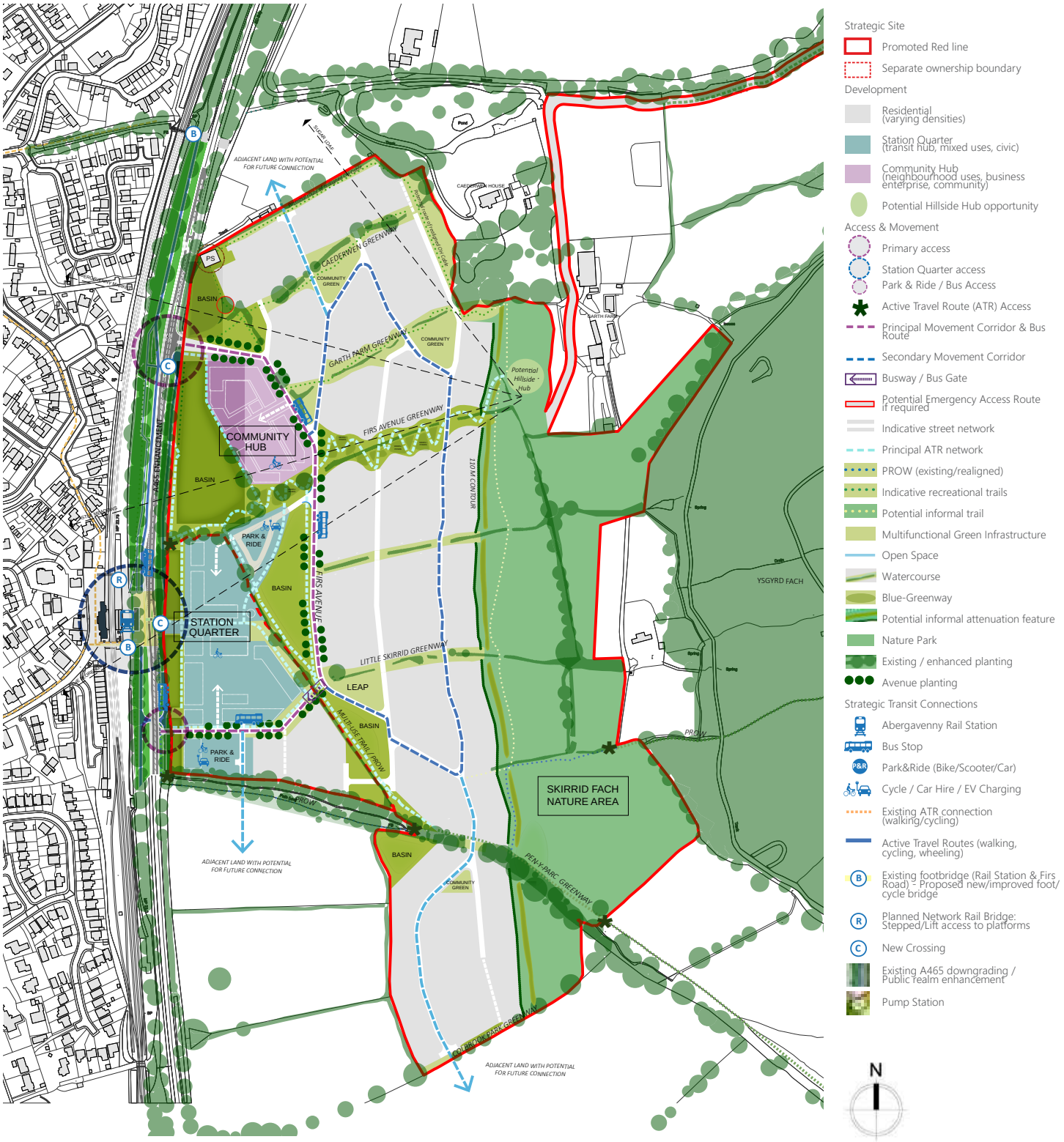
A Development Framework Masterplan has been created, providing a foundation for the development.

Illustrative Concept Masterplan



DEVELOPMENT FRAMEWORK MASTERPLAN

Strategic Site Development Framework Masterplan (Drawing Ref: 2477_SS-DFM-01_Development Framework Mplan_A3_)



Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

NEW HOMES

The development located within the red line area can deliver 500 homes during the period, including 50% affordable homes.

A diverse mix of affordable open market, intermediate and social rented homes will be provided to ensure the settlement remains balanced and meet the key issue of the RLDP to rebalance the ageing demographic, provide opportunities for younger demographics/ first time buyers and community and placemaking objectives.

Homes will be energy-efficient, built to Net Zero standards, and packed with features to cut carbon emissions and lower living costs. These include southerly facing roofs primed for solar PV, on-plot electric vehicle charging, superior insulation to reduce energy loss, and smart home tech to optimise efficiency. Generous landscaped gardens and planting will provide create opportunities for sustainable gardening and food growing.

Density

A range of densities will be accommodated across the development ranging from 25 to 120 dwellings per hectare, sensitively reducing along the sites outer, upper edges and increasing around the Station Quarter, Community Hub and Main Avenue. Refer to Density Plan illustrating the density strategy.

Sensitivity

All homes will be strategically located below the critical 110m contour to minimise landscape visual impact and preserve the natural aesthetic of the surrounding area. This thoughtful placement ensures that developments harmonise with the existing topography, maintaining sight lines and reducing visibility from key vantage points. By integrating the homes into the landscape, this approach balances development with environmental stewardship and visual integrity.

High quality homes set designed to appropriate densities









STATION QUARTER

The Station Quarter is a transformative mixed-use district and destination that redefines connectivity and community through sustainability and innovation.

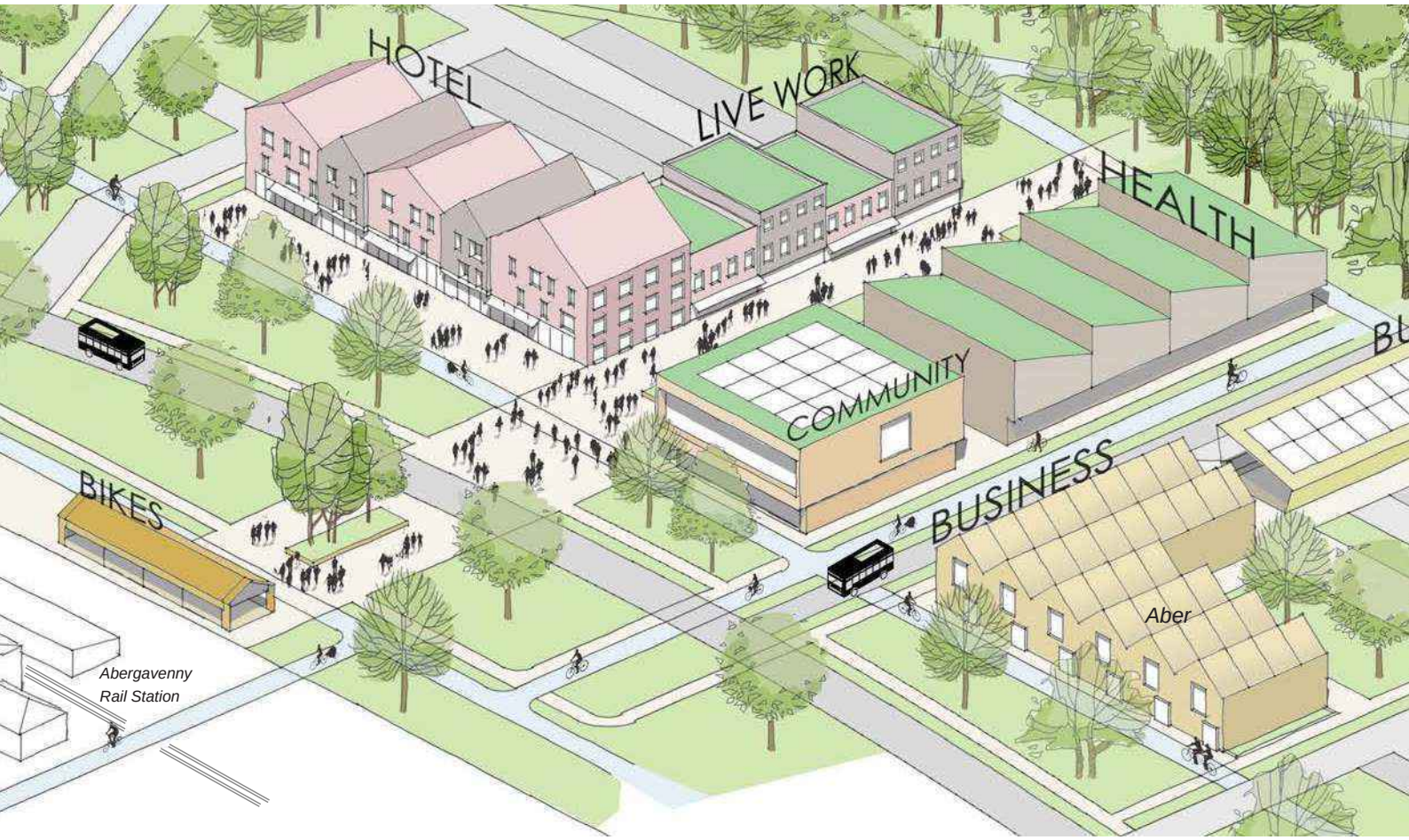
At its heart lies a vibrant pedestrian plaza, seamlessly linking the neighbourhood to Abergavenny Station via the re-purposed A465 Avenue, designed with people and cyclists at its forefront. This thoughtfully crafted space fosters walkability, encourages active transportation, and creates a safe and inviting environment for all.

The Station Quarter offers a dynamic and adaptable blend of uses, balancing community vitality, business opportunities, and transit efficiency. It provides a flexible framework for a range of activities, from entrepreneurial ventures to collaborative workspaces, health-focused amenities, modern residential living, and a hotel. A Park-and-Ride interchange ensures seamless mobility while reducing car reliance.

Sustainability is prioritised throughout, with green infrastructure promoting biodiversity and energy-efficient buildings powered by renewable energy.

The district supports an inclusive, resilient community where residents, locals, and visitors alike can gather, connect, and thrive.

Indicative concept diagram showing vibrant, connected Station Quarter



COMMUNITY HUB

The Masterplan concept introduces two distinctive, higher-density courtyard environments, each thoughtfully designed to serve complementary purposes while fostering community, connectivity, and a sense of belonging. These courtyards, integrated with the Station Gateway, are characterised by a local and residential feel, balancing vibrancy with privacy.

Community Courtyard

At the heart of the development lies the Community Courtyard, a dynamic hub for local life. Centred around a landscaped gathering space, it fosters social interaction, activities, and community engagement.

The central courtyard offers a vibrant environment with seating, greenery, and spaces for both formal and informal gatherings. It features flexible areas for events, pop-up markets, and seasonal celebrations, with spill-out zones from cafés or community rooms that enhance the indoor-outdoor experience.

Key amenities surrounding the courtyard include:

- A family-friendly café or niche retail space with outdoor seating.
- Multi-purpose community rooms for local events, workshops, and group activities.
- Co-working spaces equipped with meeting rooms and reliable internet to support remote workers and small businesses.
- The flexible building design allows for essential services, such as a crèche, to cater to working families. Pathways link the courtyard to nearby green spaces and trails, expanding its functionality and enhancing its role as a community anchor.

Neighbourhood Courtyard

Complementing the Community Courtyard is the more private Neighbourhood Courtyard, designed as a flexible, mixed-use environment that balances functionality with a residential focus. This space accommodates a variety of uses, creating an intimate yet dynamic setting for residents and select businesses.

The Neighbourhood Courtyard supports:

- Residential Living- town houses, maisonettes, and apartments border the courtyard, with balconies and terraces providing private outdoor spaces that overlook and connect to the communal areas. These homes form part of First Avenue and overlook the inner courtyard and southern landscapes.
- Mixed-Use Flexibility: Small-scale businesses, creative studios, or niche retail spaces are integrated into the courtyard, fostering a semi-private yet engaging atmosphere. A tranquil and enclosed design promotes relaxation and privacy, while landscaping and spill-out areas create opportunities for small gatherings or creative activities.

Linking the Courtyards

The courtyards are interconnected by a well-designed public realm. A vibrant 'exchange zone' blends the community-focused and private spaces. This zone offers flexible areas for workshops and small businesses, with spill-out spaces encouraging interaction.

Both courtyards link to a wider network of public pathways, ensuring easy access from the Station Gateway and connections to surrounding residential areas and green-spaces, promoting recreation and a stronger connection to nature.







An indicative concept diagram illustrating the Community Hub 'courtyards' as a vibrant focal point for local life. The courtyards foster strong links between indoor and outdoor areas, creating a welcoming and multifunctional environment that promotes a sense of belonging for residents and visitors alike.



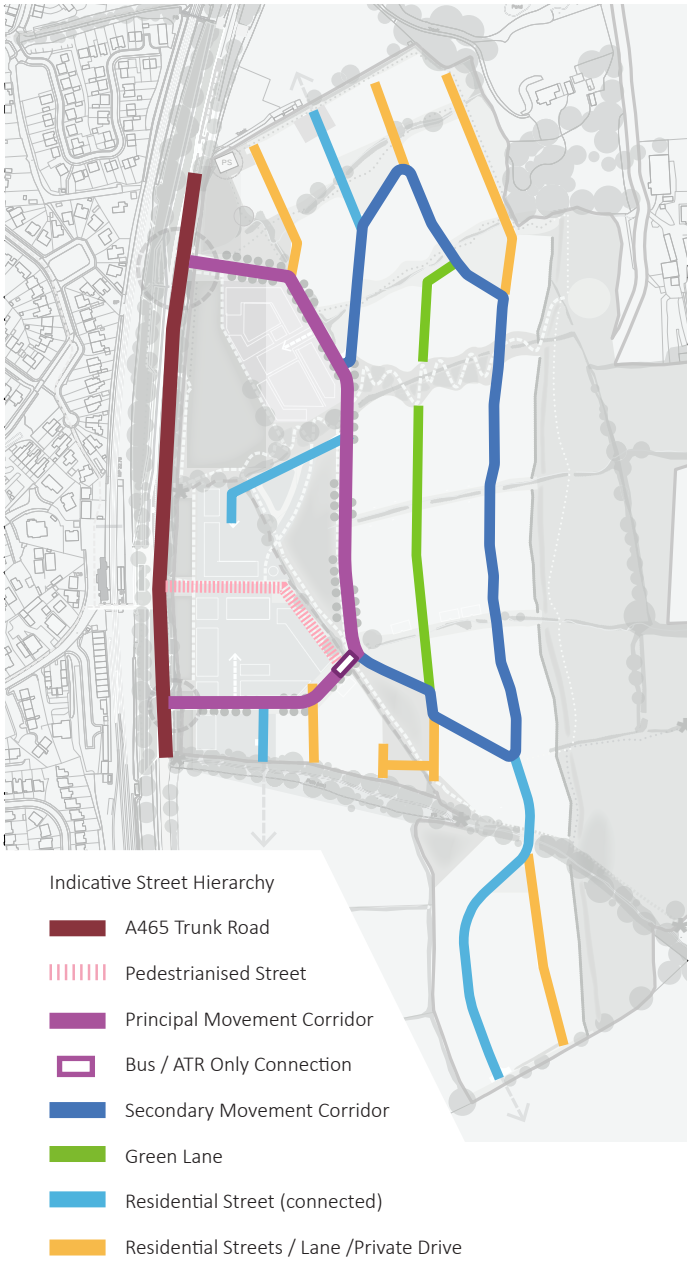
STREET HIERARCHY

The proposed street hierarchy plan creates a legible, connected layout prioritising pedestrians, cyclists, and sustainable transport, while ensuring efficient vehicle access where necessary. The hierarchy is illustrated right. In line with Manual for Streets principles, the design reduces the impact of vehicles, prioritising active transport modes. The streets will be direct, safe, and well-connected, with varied street widths, surface materials, and landscaping strategies to create a sustainable, cohesive urban environment. The character and identity of each street will vary, incorporating a mix of street widths, surface materials, and landscape planting strategies that contribute to a diverse, cohesive, and sustainable urban environment.

Re-purposing of the A465 Trunk Road

A key component of the access strategy is the re-purposing of the A465 Trunk Road. It is proposed to downgrade the A465 to 30MPH, transforming it into a pedestrian- and cyclist-friendly thoroughfare. This change will reduce vehicle reliance while improving accessibility for all transport modes. The corridor will prioritise walking and cycling with wide pathways, cycle lanes, and green infrastructure. Dedicated bus and cycle lanes will ensure efficient public transport. Vehicular access will be carefully managed to minimise traffic impact, supporting sustainable goals while still providing necessary access. This transformation will make the A465 Corridor an environmentally-conscious gateway into the development, improving both functionality and appeal.

Street Hierarchy





SUMMARY

This Placemaking Booklet outlines how the proposed development of Land East of Abergavenny, A465 adopts a design-led approach to deliver a vibrant, sustainable, and inclusive mixed-use neighbourhood. The vision integrates homes, local facilities, employment opportunities, and green infrastructure to create a balanced community that supports healthy lifestyles, social interaction, and economic growth. The proposal aligns with key placemaking goals and policy frameworks:

- **Planning Policy Wales Placemaking Themes**
  Emphasising Strategic and Spatial Choices, Active and Social Spaces, Productive and Enterprising Places, and Distinctive and Natural Places to ensure a holistic approach to development.
- **National Sustainable Placemaking Outcomes**
  Focusing on sustainable communities, economic growth, efficient use of resources, environmental protection, and creating accessible and healthy environments.
- **Future Wales 2040 placemaking principles**
  Delivering a rich mix of uses, diverse housing types and tenures, walkable, dense neighbourhoods supporting public transport and local amenities, while integrating Green Infrastructure and creating permeable street networks.

PPW: Placemaking Themes



- **The Well-being of Future Generations Goals**
  Promoting a prosperous, resilient, and healthier Wales with equal, cohesive, and culturally vibrant communities responsive to global challenges.
- **TAN 12 objectives of good design**
  Embedding principles of access, character, community safety, environmental sustainability, and movement to create places people value.
- **Placemaking Principles**
  Upholding the core principles of the DCFW Placemaking Charter, with a people-centred, adaptable, and sustainable design.
- **Net zero design principles**
  Including energy-efficient buildings, renewable energy generation, and sustainable drainage systems, this phase will demonstrate a commitment to reducing carbon emissions.
- **Affordable homes**
  Delivering 50% affordable housing ensures equitable access to high-quality, sustainable homes, fostering a diverse and thriving community.

In summary, these elements collectively set the stage for a vibrant and interconnected new neighbourhood community that becomes a benchmark for sustainable and forward-thinking development.

MHA
Monmouthshire Housing
Tai Sir Fynwy

Abergavenny East Strategic Site
Density Framework Plan

Strategic Site

Promoted Red line

Separate ownership boundary

Indicative Density Range:
dwellings per hectare (dw/ha)

Higher Density (75 to 120 dw/ha)

Medium to Higher Density (50 to 70 dw/ha)

Medium Density (35 to 50 dw/ha)

Lower Density (25 to 35 dw/ha)

N

REV.	DESCRIPTION	DATE

CLIENT

Monmouthshire Housing Association

JOB TITLE

Abergavenny East

DRAWING TITLE

Strategic Site:
Density Framework Plan

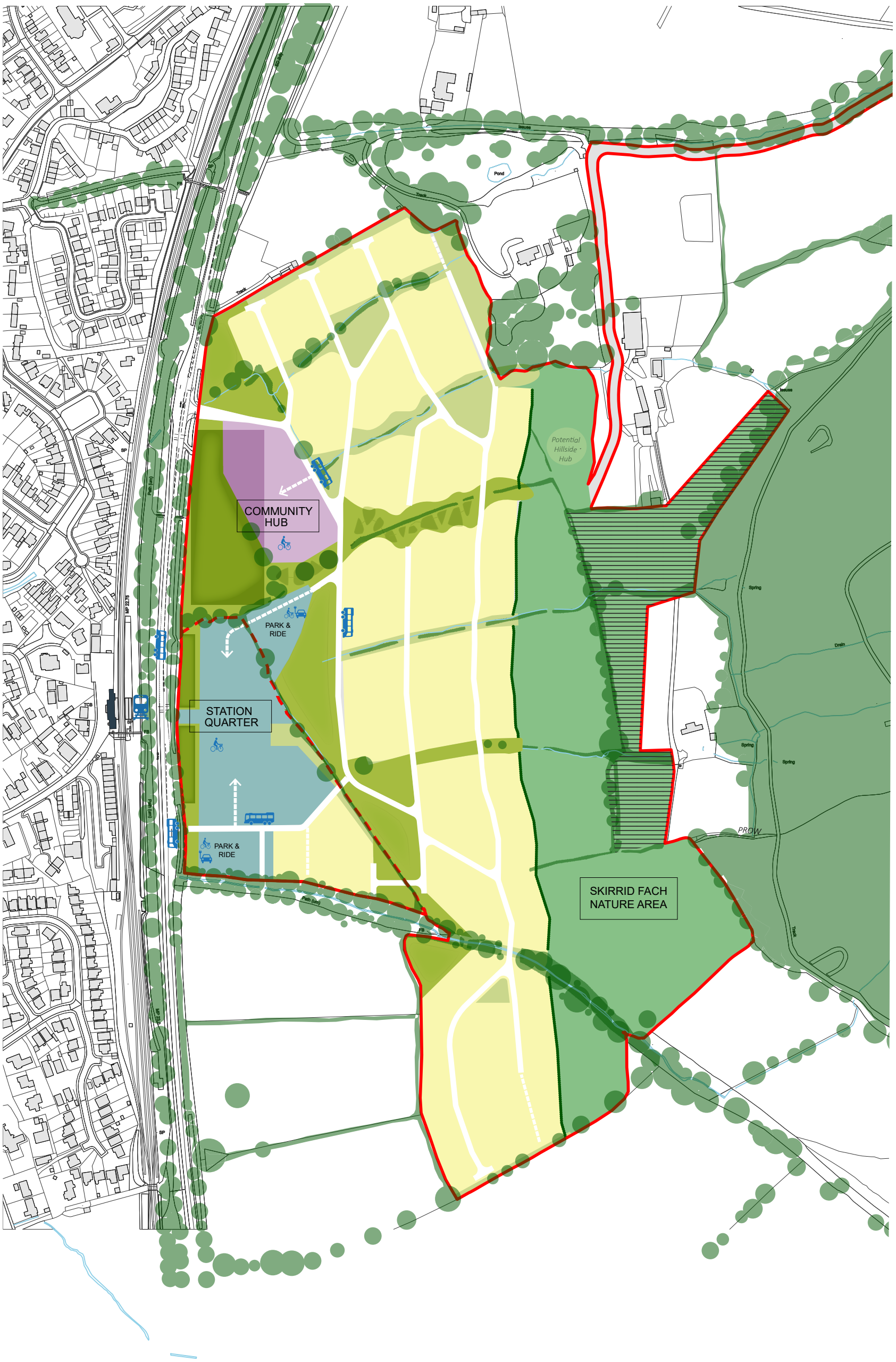
SCALE @ A3	DATE	DRAWN BY
1:4000	Dec '24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-DFP-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Abergavenny East Strategic Site
Land Use Framework Plan



Strategic Site

- Promoted Red line
- Separate ownership boundary

Land Use

- Residential (varying densities)
- Station Quarter (transit hub, mixed uses, civic)
- Community Hub (neighbourhood uses, business enterprise, community)
- Potential Hillside Hub opportunity

Access & Movement

- Abergavenny Rail Station
- Bus Stop
- Park&Ride (Bike/Scooter/Car)
- Cycle / Car Hire / Charging
- Indicative street network

Multifunctional Green Infrastructure

- Open Space / GI / SUDS
- Watercourse
- Blue-Greenway
- Attenuation area
- Nature Area
- Existing / enhanced planting
- Indicative location of Local Equipped Play Area (LEAP)
- Indicative location of Local Area of Play (LAP)

N

REV.	DESCRIPTION	DATE

CLIENT
Monmouthshire Housing Association

JOB TITLE
Abergavenny East

DRAWING TITLE
Strategic Site:
Land Use Framework Plan

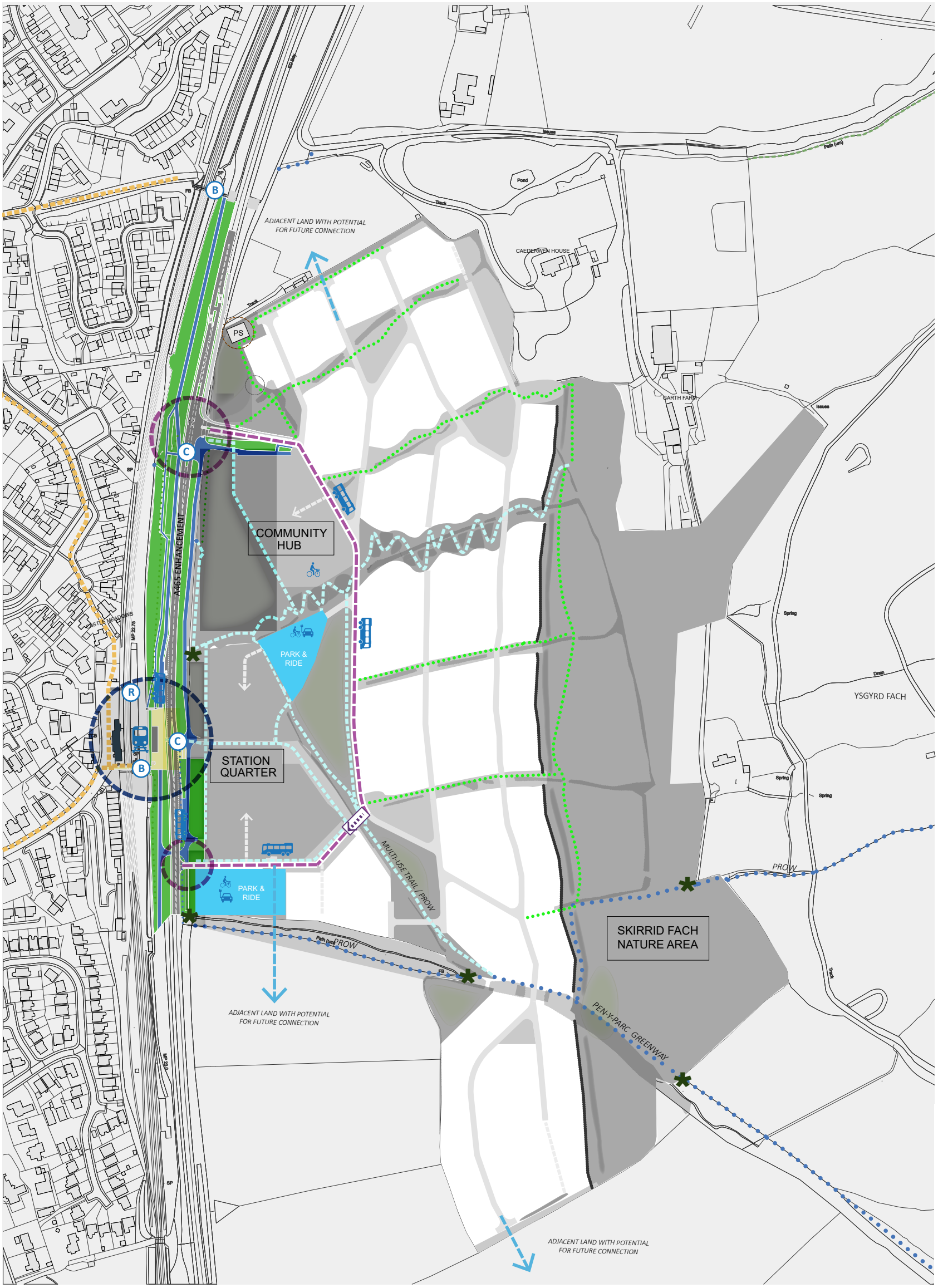
SCALE @ A3	DATE	DRAWN BY
1:4000	Dec ‘24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-LUF-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Abergavenny East Strategic Site
Movement Framework Plan



Strategic Site

- Promoted Red line
- Separate ownership boundary

Access & Movement

- Primary access
- Station Quarter access
- Park & Ride / Bus Access
- Active Travel Route (ATR) Access
- Principal Movement Corridor & Bus Route
- Secondary Movement Corridor
- Busway / Bus Gate
- Potential Emergency Access Route if required
- Indicative street network
- Principal ATR network
- PROW (existing/realigned)
- Indicative recreational trails

Strategic Transit Connections

- Abergavenny Rail Station
- Bus Stop
- Potential Park&Ride (Bike/Scooter/Car)
- Cycle / Car Hire / EV Charging
- Existing ATR connection (walking/cycling)
- Active Travel Routes (walking, cycling, wheeling)
- (B) Existing footbridge (Rail Station & Firs Road) - Proposed new/improved foot/cycle bridge
- (R) Planned Network Rail Bridge: Stepped/Lift access to platforms
- (C) New Crossing
- Existing A465 downgrading / Public realm enhancement

N

REV.	DESCRIPTION	DATE

CLIENT: Monmouthshire Housing Association

JOB TITLE: Abergavenny East

DRAWING TITLE: Strategic Site: Movement Framework Plan

SCALE @ A3	DATE	DRAWN BY
1:4000	Dec '24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-MOV-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Planning & Development Consultancy

tel. [redacted]
mob.
email.
web. gjplanning.co.uk
address. Office 16, House 1,
2nd Floor, The Maltings East
Tyndall Street, Cardiff CF24 5EA

16th December 2024

fao. Monmouthshire County Council

address. Planning Policy
County Hall, The Rhadyr
Usk
NP15 1GA

Dear Sir / Madam

Monmouthshire Replacement LDP Deposit Plan – 2018-2033
LAND EAST OF A465, ABERGAVENNY (Policy HA1 – Land to the East of Abergavenny)

Please find enclosed, on behalf of, and under instruction from our client, Monmouthshire Housing Association, and the landowners, representations for consideration as part of Monmouthshire's RLDP Deposit Plan.

This submission comments on the Deposit Plan, and by association the candidate site promoted in the LDP Call for Candidate Sites for Land East of A465, Abergavenny (which forms a central part of the strategy).

The representations made herein are in support of, and make comments regarding, the provisions of the Deposit Plan itself, and the Strategic Site allocation proposed within the Plan – specifically Abergavenny East set out in within Strategic Policy S8 (Site Allocations Placemaking Principles) and Policy HA1 (Land to the East of Abergavenny).

Considerable, and detailed, submissions have been made to-date in conjunction with discussions with the Local Authority, and other statutory bodies to promote and confirm the unequivocal deliverability of this site as set out in the proposed trajectory of the Deposit LDP.

The site has also been subject to an extensive and independent viability assessment which confirms the site is deliverable, taking into account likely 'opening up costs', planning obligations likely to be levied, and other infrastructure and general build costs taking into account current circumstances.

To support all of this, and as agreed with the Local Authority, despite the comprehensive submission of material and illustrative material provided to-date as part of the emerging plan process, the site promoter is preparing, through the design-team, an appropriate supporting formal layout to support the examination process and pre-application process to:

a) Confirm SUDS / SAB requirements are accommodated;
b) confirm placemaking requirements of PPW12 and Future Wales Plan; and
c) confirm the above matters do not impact the proposed quantum as part of the allocation – thus not undermining the allocation or its intended yield.

In terms of timings and trajectories, this is fully supported, and the intention to engage formally with the Local Authority through formal pre-application dialogue in earnest to support the delivery of this site remains. Ensuring that the scheme meets placemaking, Green Infrastructure and Suds requirements, which are key considerations. All of this can form part of the LDP Examination process in conjunction with the pre-application process.

In summary, these representations fully support the Deposit Plan as a whole, but wish to make comments on the policy provisions of the Plan itself. This is expanded in greater detail in the following sections.

1. RLDP SITE-SPECIFIC POLICY WORDING

The currently proposed wording of policies '*Site Allocation Placemaking Principles (Policy S8)'* and '*Land to the East of Abergavenny (Policy HA1)'* is worded below in italics. Whilst the strategic site is not yet subject to formal pre-application dialogue or planning application with the Local Authority, it is expected to be in the short term (in order to support deliverability, and engage early with the Local Authority to ensure the comprehensive dialogue takes place with all stakeholders). As a result, there are likely to be areas and aspects of the plan and its context which require flexibility to be built in.

As a result, it is considered that policy wording needs to adopt a flexible approach, whist still requiring the same output and principles to be met in meeting the policy requirements. Specifically, the policy wording uses the term 'must' in setting out the requirements of the overall policies, however, it is considered that this could and may well create inflexibility at planning application stage. Accordingly, we object to aspects of the current wording of the policy, and consider that an alternative approach / provision would be more appropriate and justified. As such, the use of the term 'should' is considered more appropriate, which is equally expecting in terms of what is expected as part of the policy provision, but not as definitive or absolute.

For ease, 'tracked changes' comments are provided in red text to outline where appropriate wording to policy text should be amended to improve flexibility to the policy wording. There is further text, in green, whereby our (GJP) considerations are added owing to a suggested change. It is considered these amendments will not undermine or materially affect the policy requirements, rather, allow a degree of interpretation by the applicant and decision-maker (The Local Authority), not least to reflect prevailing circumstances at the relevant time.

Policy Wording of Strategic Policy S8 – Site Allocation Placemaking Principles

"All residential site allocations ~~must~~ should comply with and incorporate the following placemaking principles into the schemes:

Sustainable Communities

- *Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location. Where appropriate, the layout will identify and respect key views to and from the wider landscape setting.*
- *Provision of 50% affordable homes on-site comprising a mix of housing types and tenures to meet local need.*
- *Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points.*
- *Provide a mix of house types, tenures, sizes, materials and colour to be developed at an appropriate density.*
- *Broadband /digital infrastructure ~~must~~ should be provided to serve each new home.*

Green Infrastructure, Landscape and Nature Recovery

- *Make provision within the development for appropriate green infrastructure, multifunctional streetscapes and useable public open space in accordance with National Policy and agreed standards, including play and recreation provision, community growing opportunities and accessibility for all.*
- *Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualifies and sensitivities of the area.*
- *Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.*
- *Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.*

- *Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.*

Sustainable Travel and Highways

- *Design of the site and its connections ~~must~~ should prioritise active travel to local trip attractors and public transport, in line with the Sustainable Transport Hierarchy (PPW12/Wales Transport Strategy). Active Travel Act guidance should be applied to routes, facilities and sustainable transport promotion.*
- *Sites ~~must~~ should provide for, and / or, contribute to active travel and public transport improvements as necessary.*
- *Ensure that the development does not adversely affect the safety, capacity and operation of the highway network.*
- *Streets ~~must~~ should, where appropriate, be designed and built to adoption standards in accordance with national and local design standards and offered for adoption pursuant to the requisite highway adoption agreements.*

Education Requirements

- *Sites ~~must~~ should provide for, and / or, contribute to primary and secondary school provision in the area in accordance with capacity requirements.*

Residential amenity

- *Ensure a safe, secure, pleasant and accessible environment for all members of the community.*
- *Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties.*
- *Incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate.*
- *Incorporate good acoustic design which ~~must~~ should be compatible with thermal comfort by ensuring adequate ventilation and avoidance of overheating, in the interests of protecting residents from the harmful effects of noise.*

Flood Risk and Sustainable Drainage Systems

- *Potential flood risk to, or as a consequence of, the development of the site must be suitably assessed in accordance with national planning policy.*
- *The development ~~must~~ should manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. The distribution of SuDS features across the site should be prioritised. ~~reducing the size of any single SuDS feature.~~*

Policy Wording of Policy HA1 – Land to the East of Abergavenny

"Development of the site should accord with the following parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents.

In addition to the Placemaking Principles identified in Policy S8, the site ~~must~~ should comply with the following:

Sustainable Communities

a) *To provide a residential-led mixed-use development containing the following key uses:*
   - *Approximately 500 homes* including 50% affordable homes.*
   - *A minimum 1 hectare of B1 Use Class uses.*
   - *A neighbourhood centre, the uses and scale of which to be agreed by MCC.*

- *Green infrastructure and open space provision, including allotments/community food growing spaces, incorporating the creation of focal points for the community.*
- *Park and ride facility serving Abergavenny Railway Station.*
- *Active travel connections with visible, prioritised routes to/from the site to the Railway Station and Abergavenny.*

b) *The completion of non-residential elements ~~must~~ should be delivered in line with an agreed phasing programme.*
c) *The site design and masterplanning should create an exemplar of residential and GI-led placemaking, establishing clear parameters and principles to be followed by site developers.*
d) *Provision of an appropriate design response and interface between the western edge of the development and the A465 corridor that respects the importance of the visual connectivity between the site and existing settlement and is in keeping with the distinct character of Abergavenny.*
e) *A balanced approach to densifies should be provided that makes efficient use of land and reflects the character of Abergavenny while also respecting the character of the surrounding landscape.*
f) *Higher densities should be focussed on western and central locations and towards key attractors such as the mixed-use centre and Railway Station. Lower density development may be appropriate along the eastern boundary to retain the visual and physical integrity of the urban/countryside edge and maintain the distinct landscape character of Abergavenny.*
g) *Densifies and layout should respect the changes in levels within the site.*

Green Infrastructure, Landscape, and Nature Recovery

h) *Site design and layout should include opportunities to capture views of the wider landscape including the Bannau Brycheiniog National Park (BBNP) and the Usk Valley.*
i) *Development ~~must~~ should ensure the retention and protection of substantial GI assets as far as possible, including retaining and enhancing tributaries of the River Gavenny.*
j) *Hedgerows along the site boundary should be retained with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors.*
k) *Any tree loss associated with the redesign of the A465 corridor ~~must~~ should be subject to appropriate compensatory planting.*

Sustainable Travel & Highways

l) *A connectivity strategy setting out the number, location, form and delivery of connectivity points between the site and existing settlement of Abergavenny will be agreed with the Local Planning Authority. The strategy will include changes to the character and environment of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line.*
m) *Off-site highway infrastructure improvements ~~must~~ should be delivered as necessary, having regard to requirements arising from the Transport Assessment and including:*
    - *An agreement with the Highway Authority for the proposed accesses and junction on to the A465.*
    - *Emergency secondary access on to Garth Road.*
n) *Make provision for good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including linkages to the local schools, Abergavenny town centre and bus transport services.*
o) *Incorporate and enhance the existing Public Right of Way footpaths as key connection routes running through the site linking up with wider Abergavenny and as a through route to the wider countryside.*
p) *Make provision for a bus link into the site design and, if necessary, a financial contribution towards improved public transport and bus frequency.*

Air Quality

q) *Incorporate satisfactory air quality measures for mitigating and/or reducing emissions.*

A masterplan establishing key design and placemaking principles is being prepared and will be agreed with the Local Planning Authority prior to the determination of any planning application."

To re-cap, the proposed changes in red text are considered appropriate, and do not materially affect the overall requirements of the strategic policy.

Justification for Amendment

It is considered that, given the current wording of the text, any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text (as currently worded) would not be in accord with the policy, and by association the plan. This is as a result of the wording including the terms 'must' and 'required'. Greater flexibility is therefore required to be provided for in the text wording.

Whilst the emerging proposals for the site fully expect to deliver the principles and key elements of the emerging allocation, greater flexibility (or rather less absolute requirement) needs to be allowed for. This reflects the position that the proposals are continually emerging, and will continue to evolve as a result and product of the subsequent planning application process (and consultation responses to that). It is, for example, stated elsewhere in the Plan (para. 6.3.4) that "*Submitted viability assessments demonstrate at the time of publication that these sites are deliverable. However, it is recognised this could change in the future…".* This reflects the need to appraise the position as and when the schemes for each site are presented and assessed, and recognises that some changes may be necessary or merited, or even desirable.

The terms 'must' and 'required' accordingly have the potential to be inconsistent with this, and inadvertently frustrate. Failure to adjust the language and terminology of the Plan in these respects could have the ability to frustrate the delivery of key sites. Any such frustration would, given that the Plan's housing provision is based over 73% on the Strategic Sites, ultimately compromise the delivery and effectiveness of the Plan itself. This raises questions of soundness.

Moreover, policy wording 'should' rather than 'must' has been accepted and adapted into various policies for Swansea LDP (adopted 28th February 2019) and more recently, in the Bridgend LDP (adopted 13th March 2024). It is therefore acknowledged by previous Plans and Inspectors that this wording is appropriate and acceptable.

2. POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

It is considered that Policy NZ1 in the Deposit Plan is of relevance to the proposed site in respect of the residential housing proposed. It is noted that PPW states "*Our homes, businesses and communities need to be powered and heated by low carbon energy sources, which also includes reducing and optimising our use of energy within them. Use of non-renewable sources of energy will need to be curtailed if we are to meet our carbon reduction targets and international obligations on climate change."* (Para 5.0.2).

As such, it is considered that the principle of the inclusion of Policy NZ1 supports the Wales target as set out within the Net Zero Wales Carbon Budget 2 Plan and is the first of it's kind in Wales. However, it is considered that the proposed wording of the policy in its current form is unclear and requires clarification (i.e. on the proposed 'unit' of carbon and how this is measured).

In reviewing the proposed policy wording, some background research has been undertaken into other LDP policies (in England and Wales) which Policy NZ1 can be assessed against. As such, the follow extract is taken from the Climate Emergency Development Plan Document (February 2023) adopted by Cornwall Council which is considered to be relevant:

2b) **New Development – Residential**

Residential development proposals will be required to achieve Net Zero Carbon and submit an 'Energy Statement' that demonstrates how the proposal will achieve:

- Space heating demand less than 30kWh/m2/annum;
- Total energy consumption less than 40kWh/m2/annum; and
- On-site renewable generation to match the total energy consumption, with a preference for roof-mounted solar PV.

Where the use of onsite renewables to match total energy consumption is demonstrated to be not technically feasible (for example with apartments) or economically viable renewable energy generation should be maximised as much as possible; and/or connection m a d e to an existing or proposed low carbon district energy network; or where this is not possible the residual energy (the amount by which total energy demand exceeds the renewable energy generation) is to be offset by a contribution to Cornwall Council's Offset Fund.

Where economic viability or technical constraints prevent policy compliance, proposals should first and foremost strive to meet the space heating and total energy consumption thresholds. Proposals must then benefit as much as possible from renewable energy generation and/or connection to an existing or proposed low carbon district energy network. As a last resort, any residual energy is to be offset by a contribution to Cornwall Council's Offset Fund, as far as economic viability allows.

While this policy does not require the application of these standards to reserved matters applications that relate to outline planning permissions that predate the adoption of this climate Emergency DPD, developers are encouraged to apply these standards on a voluntary basis, where it is feasible to do so and not within breach of existing permissions.

Given the above, and that the policy was recently adopted last year by Cornwall Council, it is therefore suggested that Policy NZ1 is re-worded to the following:

"All new build residential development will be required to demonstrate compliance with the standards outlined below through the submission of ~~an appropriately detailed, RICS aligned operational~~ an energy assessment with any planning application resulting in the creation of 1 or more dwellings. Development proposals for new homes must demonstrate the following:

- *Space heating demand less than 25 kWh/m²/yr;*
- ~~*On-site renewable energy generation to deliver the greater of: - matching the annual regulated electricity demand of the development; or - generating at least 40 kWh/m²fp/yr;*~~
- *EPC A or equivalent in accordance with the current version of the National Calculation Methodology for assessing the energy performance of dwellings;*
- *New homes must not connect to the gas grid and all heating and hot water needs should be met by low carbon heating systems. No fossil fuel systems are to be used on-site;*
- *Ensure that developments are served by / cater for future technological developments such as electric vehicle charging ~~ULEV charging infrastructure must be provided to every dwelling~~.*

All developments must submit an as built performance survey ~~following construction and prior to occupation of the home/s~~ to demonstrate that they have been built to the applicable standards and minimise the 'performance gap.'"

Justification for Amendment

In principle, MHA are supportive of a policy regarding providing net zero carbon homes. The proposed wording of Policy NZ1 will require homes to be constructed to a higher standard than Part L 2022 (Appendix E). This is supported in principle given that all of MHA's land-led developments (since 2021) are already achieving Part L 2022 (Appendix E) as a minimum and have achieved +100 SAP on the most recent homes.

That said, there are some elements of the proposed Policy NZ1 which MHA seek to review and object to. These points are detailed below.

Energy Assessment

Firstly, it is noted that the first part of the policy specifies that a "*RICS aligned operational*" Energy Assessment must be submitted with any planning application. MHA object to the wording of this and would suggest that this element of

the policy should be removed. RICS do not allow the use of national calculation methodology in Whole Life Carbon Assessments - as referenced elsewhere in the policy wording. Whole life carbon refers to the carbon impacts over the entire life cycle of a built asset, from its construction through to its end of life. A Whole Life Carbon Assessment is the calculation and reporting of the quantity of carbon impacts expected throughout all life cycle stages of a project, but also includes an assessment of the potential benefits and loads occurring beyond the system boundary.

As such, the Whole Life Carbon Assessment for the Built Environment (1st July 2024) by RICS should be considered when reviewing the proposed wording of the policy and, instead, the Policy wording should be amended to require the submission of 'an Energy Assessment' instead.

Energy Generation

The space heating demand of less than 25kWh/m2/yr as set out in the first bullet point is considered acceptable - if using national calculation methodology. Moreover, the requirement for all new homes to comply with EPC A is also welcomed and supported.

However, MHA would object to the requirement of the policy for the requirement to generate at least 40kWh/m2/yr. this is because small houses or flats have smaller roofs, meaning that these areas may not be great enough to get enough solar panels on the roof. This would have a direct impact on the ability to generate this much energy. This part of the policy would be too restrictive for smaller new builds to meet and therefore should be removed accordingly, as it may prevent certain development / house types coming forward.

ULEV Charging Infrastructure

MHA recently made representations to Welsh Government on the Consultation regarding "Electric Vehicle Charging in Residential and Non-Residential Buildings" (November 2024). The consultation sought views on the draft amendments to Building Regulations in Wales. The draft amendments propose to mandate the provision of electric vehicle changepoints in new residential, non-residential buildings, and buildings undergoing major renovations, or material change in use, which have associated car parking.

Community Housing Cymru made representations on behalf of MHA to the consultation. The key points which were raised regarding the amendments were as follows – and are also considered relevant to the proposed wording of Policy NZ1:

- Affordability for social tenants – any electric charging would need to be reclaimed through the tenants' service charge which would be difficult for communal settings – and flatted schemes. Moreover, the principle of charging port for each property doesn't tally with the general lower car ownership / users for housing association schemes with Housing associations taking active measured steps to ensure that tenants do not need access to cars to live well;
- Ongoing maintenance – this requirement could create a challenge for management and maintenance – specifically challenges around electricity costs and affordability to tenants;
- Impact on delivery – this requirement could impact on delivery given the pressures on development and maintenance;
- Wider considerations:
    - Capacity of the grid;
    - Risk of charging points becoming obsolete;
    - Risk of unintended consequences and need for clear policies and exemptions for sites where developers can not feasibly implement these requirements; and
    - Impact on placemaking and design philosophy where sites are not suited to adding these requirements and a mandate to do so may compromise other aspects of the site such as communal green spaces, Active Travel design elements etc.

As such, and on this basis, MHA would suggest that the policy is re-worded to allow for further level of flexibility. The proposed change to the policy is suggested as follows:

"Ensure that developments are served by / cater for future technological developments such as electric vehicle charging".

In terms of providing evidence that a more flexible wording would be better suited, Policy SP5 – Sustainable Transport and Accessibility from the Bridgend LDP (recently adopted 13th March 2024) has been reviewed in terms of the requirement for EV charging. Criteria (9) of Policy SP5 sets out that: *"(9) Ensure that developments are served by appropriate parking provision, in accordance with the Council's parking guidance, including infrastructure which caters for future technological developments such as electric vehicle charging points, and circulation areas, including adequate road widths to allow access for service vehicles".*

MHA's preferred approach would be for consideration of an exemption to these proposals for social housing providers – which instead allows Housing Associations to install the cabling, ducting and termination points for 'passive' charging points as a more appropriate way to integrate EV charging over the course of the next 10 years.

Performance Survey

It is considered that final part of the proposed policy wording for Policy NZ1, which sets out a requirement for new developments to submit a Performance Survey prior to occupation is also too restrictive and needs further detailed consideration as to practicalities of introducing this as a new requirement. The speed of being able to deliver new homes is important, especially in respect of the affordable provision, which directly responds to the homelessness crisis and the current numbers waiting for new houses on the housing register. The SAP Assessment and Building Control compliance certificate are already available to the LPA as part of Building Control approval in order to demonstrate that houses have been built to the applicable standards. Therefore, any requirement for a performance survey to be submitted prior to occupation would not be necessary and, would only add further delay and further cost and time in discharging further conditions preventing occupation in a timely manner.

Interim Summary

Accordingly, MHA support the policy in principle, but consider that the wording of the policy should be amended to ensure that the requirements set out are capable of being adhered and to allow for flexibility in the implementation of the policy, to ensure that appropriate schemes can be delivered over the Plan period. The changes suggested are considered to be appropriate, and consistent with similar policies adopted elsewhere – for example Cornwall Council as outlined above.

3. POLICY EA1 - EMPLOYMENT ALLOCATION

As set out in the Deposit Plan, the site allocation and policy for Land East of A465, Abergavenny includes a provision of B1 employment use, and is expected to provide a minimum of 1ha within the site during the Plan period (to 2033). As set out in the Site Trajectory (Appendix 10 of the Deposit Plan), the site is expected to deliver the employment use / facilities over the 'long-term' phase of the Plan period (Ref. EA1k). The submitted masterplan identifies the location of any proposed B1 uses that are to be incorporated into the site - please refer to the below section 'Framework Masterplan' for further detail.

In principle, the inclusion of B1 uses on the site allocation is supported, in that it is commensurate with the long-term vision and objectives of this key strategic site in a Tier 1 Settlement to create and establish a well-balanced and cohesive community, that will boast a wide range of land uses and the creation of jobs. The site will assist in supporting the delivery of B1 facilities, and by association, contribute to the overall required provision identified that is needed to be delivered over the Plan period for Monmouthshire. Accordingly, the development of the site will not only yield much-needed affordable and market housing, but also provide long term employment prospects and opportunities,

which, in turn, will support and improve the economic prosperity of the area. Moreover, it will allow for the integration of new employment opportunities in a mixed-use development, that will support sustainable economic growth and a sustainable neighbourhood and community – adhering with placemaking guidelines in this process.

Given the site's inherent sustainable location, directly located adjacent to Abergavenny railway station (that offers travel to and from key settlements such as Cwmbran, Newport, Cardiff and Hereford), the site's integration of B1 uses represents a suitable proposal to promote and support sustainable travel in Abergavenny and Monmouthshire. Accordingly, the site is well-located to host such facilities in this location, and is therefore, in accordance with the Plan's Spatial Strategy.

On this basis, the site's allocation in the Plan for employment use is supported, and it will play a significant role in delivery employment uses to meet the identified need over the Plan period.

4. POLICY RC4 – NEW RETAIL PROPOSALS OUTSIDE OF IDENTIFIED AND LOCAL TOWN CENTRES

Policy RC4 outlines that proposals for retail outside of any identified and local town centres must be subject to meeting the criteria of the policy (a) – (f). Moreover, a Retail Impact Assessment, to determine if there are other suitable locations to accommodate the proposed retail use. It is noted that the second part of Policy RC4 states *"Retail Impact Assessments will be required for retail and commercial developments outside the centres identified in the retail and commercial hierarchy in Strategic Policy S10, the content of which should be proportionate to the potential impact of the proposed use"*.

In relation to Land East of Abergavenny (Policy HA1), this sets out that the site must incorporate the following sustainable communities requirement: *"A neighbourhood centre, the uses and scale of which to be agreed by MCC"*.

As shown in the Framework Masterplan, this Neighbourhood Centre will likely incorporate some element of retail floorspace, possibly in the form of a local convenience store, along with possible other A1 or A3 uses - which would make this area a 'hub' wording, for the community. The principle of retail use being included within the site is considered to be supported, along with this having the ability to support and enhance any sustainability within the site - and for existing residents living in close proximity to the site. Whilst the site will be well-connected to the town, it is considered that a small on-site facility would naturally promote walking as opposed to private vehicles – internalising trips within the site accordingly. Is it therefore considered that, by this very nature, any retail use proposed (depending on size and location) within the site is justified within this context. However, it is suggested that the wording of Policy HA1 could be made more specific on what uses which would be acceptable in this 'Neighbourhood Centre' in order to clarify the position in relation to the site adhering to Policy RC4.

Accordingly, on this basis, it is queried whether any retail proposals proposed within Land East of Abergavenny would be required to comply with criteria (a) – (f) in Policy RC4, and whether a Retail Impact Assessment would be necessary for any retail uses on the site - given that the Strategic Policy Policy HA1 already sets out that there is a 'Neighbourhood Centre' should be incorporated into the site. This suggests that an element of A1 use would be justified in light of the site's proposal, scale, nature and location, and would not warrant specific and additional assessment and justification accordingly.

5. FRAMEWORK MASTERPLAN

A Framework Masterplan has been developed and submitted as part of these representations for the proposed development of the strategic site. The masterplan brings together all of the necessary assessment work undertaken so far (e.g. drainage, biodiversity, transportation, landscape etc. work) that has been undertaken to inform the pertinent considerations of the site – in order to achieve a legible and well thought-out layout. Please find this Development Framework Masterplan attached at **Appendix A.**

The key parts of this are outlined in the Placemaking Booklet (attached at **Appendix B**):

- Up to 500 new homes in the Plan period (with 50% to be affordable) but with a capacity for more dwellings (which would delivered after Plan period)
- Highway infrastructure within the site and associated upgrades to the surrounding highway network;
- Strong legible pedestrian and cycle connections both within, and to key position outside the site;
- Provision of education;
- A number of public parks, open and play spaces including the creation of a Nature Area
- A 'Community Hub' of mixed-use land aiming to provide community courtyard and uses;
- Multifunctional Green and Blue Infrastructure throughout;
- A mixed-use area 'Station Quarter' to improve connectivity to the wider region via the existing train station.

Further supporting Plans for Abergavenny East are also submitted as part of these representations in relation to Density Framework, Land Use Framework and Movement Framework Plan at **Appendix C**.

Considerable dialogue and engagement has already taken place between each of the parties having an interest in the overall / wider strategic development area. A considerable number of meetings have already taken place to ensure arrangements and relationships are in place to promote the strategic development area collaboratively and comprehensively. The opportunity is being taken forward in partnership, and the necessary arrangements and commitments are in place in order to allow for, and ensure, the effective and co-ordinated promotion of the proposal. As demonstrated through the submission of the Development Framework Masterplan, significant masterplanning works have been undertaken to date. This has been prepared based on detailed site, context, and transport analysis, and engagement and consultation with MCC Officers and as well as Design Commission for Wales, Trunk Road Agency and Transport for Wales.

To ensure that all material considerations relevant to the proposals are covered, addressed, and thoroughly satisfied, all necessary technical assessment work has been commissioned and this will be discussed further with MCC and the relevant parties in due course.

6. TRAJECTORY

It is noted that the Deposit Plan includes a Housing Trajectory in Appendix 9, which comprises a Table of the Timing and Phasing of Allocations (2018 – 2033). MHA wish to express their support for the proposed housing trajectory (as identified in Table 1: Appendix 9) for the at the site. As set out in the trajectory, the site can, and will deliver the full housing allocation (500 units) within the Plan period.

To confirm, a lead-in time of 4 years has been built into the trajectory for the site, as opposed to 2 - 3 years, which will allow for sufficient time to obtain the relevant Outline and Reserved Matters applications to be submitted and approved. In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period.

Appendix 9: Housing Trajectory

Table 1: The Timing and Phasing of Allocations (2018-2033)

Settlement Tier	CS Ref	RLDP Policy Ref	Site Name	Total Site Capacity	Planning Application Details where applicable	Time lag to construction start in			Phasing of Development (2018-33) (Base Date 1st April 2024)																					
											Actual Completions							Estimated Completions												
						Time period for pre-application discussions/ PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions To Date	U/C (units also incl. in phasing)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mth	Units phased beyond the plan period
											1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15+9 mths	
Abergavenny (Tier 1)(Primary)	CS0213 & part CS0293	HA1	Land to the East of Abergavenny	500		6 months	12 months	6 months	0	0	0	0	0	0	0	0	0	0	0	0	70	90	90	90	90	70	0

Evidence has been provided through the previous extensive representations (including Candidate Sites representations in 2021 and representations to the Preferred Strategy in 2023), made to MCC through the LDP review process thus far to evidence the suitability and viability of the site. Through the course of the previous representations, the site promoter, MHA, has also provided appropriate supporting information, including a Viability Appraisal, and other assessment work. The submissions have demonstrated that the site is not only appropriately located within close association and connection to Abergavenny, but that it is deliverable in line with placemaking requirements and economically viable - all of which fully comply with Welsh Assembly Government and Council aspirations of creating cohesive new neighbourhoods as defined in PPW12 and Future Wales 2040. Moreover, as evidenced in the housing trajectory, the site is fully deliverable, in that it will yield the full allocation (500 homes) over the Plan period.

With regards to the representations submitted to date, these have demonstrated that the site is inherently suitable for residential development, which is acknowledged by MCC by virtue of the site's inclusion as a strategic housing allocation within the Deposit Plan. It is therefore considered prudent at this stage of the LDP review, and within this submission, to further highlight the deliverability of the site, whereby it can be brought forward for development in line with the timescales set out for the allocation.

It is therefore on this basis that it is considered that the housing trajectory for the site is robust, and has been comprehensively informed by the assessment work and discussions with MCC to-date. Moreover, it has been evidenced that the proposed development is wholly available and deliverable to yield its full allocation within the Plan period, and overall, contribute to the wider housing requirement in the Plan.

In support of the trajectory, it should also be noted that positive discussions have been held and are ongoing with MCC to bring the site forward for both an allocation and development, and the site promoter is actively seeking to enter into formal pre-application dialogue with the Council in early 2025. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an Outline planning application prior to the Examination stage of the RLDP review process (Autumn 2025).

Conclusion

The site at Land East of Abergavenny (Policy HA1) is inherently suitable, sustainable and deliverable, and will make a significant contribution to achieving and realising the housing needs of Monmouthshire and the Deposit Plan the allocation for the site is supported in principle, however, it is considered that proposed amendments to the precise wording and provisions of Policy S8, Policy HA1 and Policy NZ1 should be reviewed and incorporated, as suggested as outlined above.

In light of the above, and the enclosed, we trust that this is all sufficient and understandable at this stage and look forward to hearing from you as soon as possible with such confirmation. Should however you have any queries or require anything further then please do not hesitate to contact me.

Yours sincerely,

[redacted]

[redacted]
[redacted]
Geraint John Planning Ltd.

Enc:
Appendix A - Development Framework Masterplan
Appendix B - Placemaking Booklet
Appendix C – Other Supporting Plans

PLACEMAKING BOOKLET
VISION FOR ABERGAVENNY EAST

Vision for Abergavenny East

Abergavenny is considered a 'Gateway To Wales',

Unlocking the Land East of Abergavenny offers to opportunity to create a sustainable, vibrant mixed use neighbourhood destination with a distinct sense of place and identity.

The overarching vision for the site is to create a sustainable and resilient community that will leave a legacy.

Strategically located alongside the rail station, the site will provide convenient access to walking, cycling, bus, park & ride opportunities, offering infinite live-work-travel possibilities.

Families, entrepreneurs, and communities will come together and enjoy the benefits of both urban and rural living and a real sense of community.

Strategically located at the foot of one of the seven hills- Ysgyryd Fach, the site will offer attractive views, access to natural/semi-natural settings and offering a range of recreational opportunities.

A network of community spaces, greenways and parks will provide beautiful, welcoming space for residents, visitors and commuters to meet, access facilities and spend time.

1. **Locally focused, culturally diverse**
   Deliver a distinctive place of quality and variety, nestled below Ysgyrad Fach that encourages creativity, play and inspires.

2. **Sustainable living**
   Provide a range and choice of high-quality, efficiently designed mixed-tenure homes that support affordable, age friendly, inclusive living

3. **Mixed, vibrant and diverse**
   Incorporate a variety of mixed-uses and services that support artisan facilitating development and negate the need to travel far to meet daily needs.

4. **Respectful and resilient**
   Promote environmentally sustainable design that retains, enhances and extends the diversity of landscapes and sensitively assimilate the development to the hillside.

5. **Sustainable travel behaviours**
   Prioritise Strategic Transport Improvements that connect and enhance the strategic highway, public transport, walking and cycling network, changing travel behaviours.

6. **Connected and legible**
   Define a hierarchy of streets, spaces and places that is attractive, legible, supports linked trips and reduces car dependency.

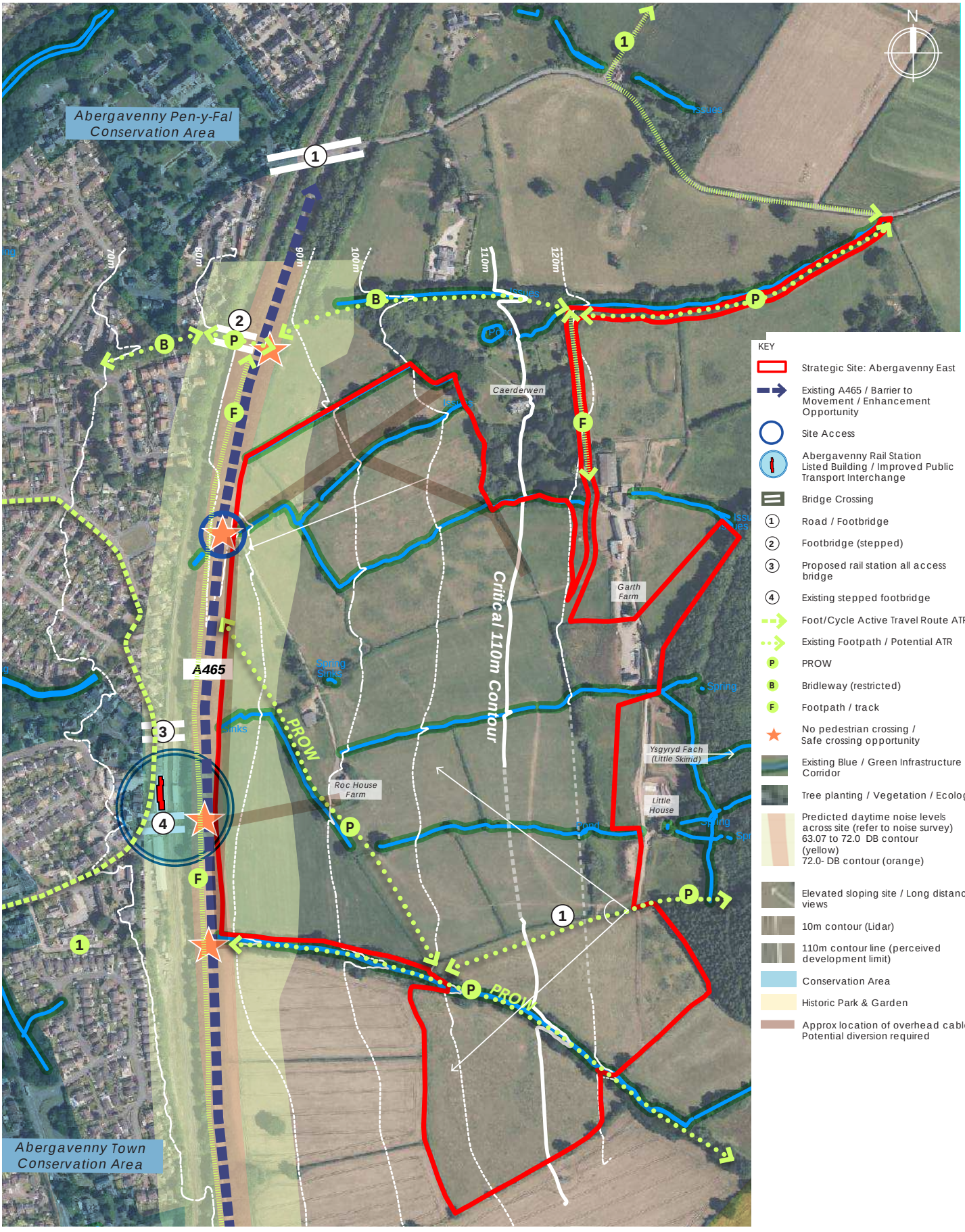
7. **Healthy lifestyles**
   Promote active, healthy lifestyles creating opportunities to spend time in nature, engage in physical recreation, play, and grow healthy food.

MHA

Core Objectives



CONSTRAINTS & OPPORTUNITIES



PLACEMAKING PRINCIPLES

Specifically, the development of this strategic site will promote the six DCFW Placemaking Charter principles as outlined below:

- **People and Community**
  The proposals consider and prioritise the needs, aspirations, health, and well-being of all people from the outset. A supply of housing that meets the needs of the present and future generations is proposed, well served by local facilities, and will encourage healthy inclusive and sustainable lifestyles. Going forward the development will involve stakeholders and the local community in the development of proposals.

- **Location**
  The flexible land use framework will allow the development to grow and develop in a way that uses land efficiently; supports and enhances existing places and is well connected. The location of the local centre, housing and other facilities are planned to help reduce the need to travel.

- **Movement**
  The development is located adjacent to Abergavenny Station and promotes the enhancement of existing infrastructure and connections that will prioritise walking, cycling and public transport use and avoid dependence on private vehicles. Well designed and safe active travel routes care proposed that will encourage active, sustainable travel.

- **Mix of use**
  The development incorporates a local centre and opportunities for community development, local business growth and access to jobs, services, and facilities, supporting a diverse community and vibrant public realm.

- **Public Realm**
  The development creates well defined, safe, and welcoming streets and public spaces and find a balance between movement, access, and character of place. Landscaping will soften the appearance of the street and create sociable, active environments. The development will protect and enhances the natural environment and pro-actively manages surface water drainage.

- **Identity**
  The vision for the site prioritises the importance of creating a positive, distinctive identity for the development that draws on the unique features and setting of the site. The ongoing design process will explore opportunities to incorporate heritage, culture, Welsh language, built and natural physical attributes in an engaging way. The development will incorporate a range of house and building types that have their own character but also complement and enhance the setting, helping to unify the development.

These principles have guided the creation of the masterplan framework, ensuring the delivery of an ambitious and integrated development that thoughtfully addresses the site's unique opportunities and constraints.

THE MASTERPLAN

The development of this strategic site will enable the delivery of up to 500 new homes within the Plan period, with 50% designated as affordable housing, alongside a neighbourhood centre providing mixed-use land, including B1 enterprise support. The site also has the capacity to accommodate additional dwellings beyond the Plan period.

The development will include highway infrastructure within the site, along with associated upgrades to the surrounding road network, designed to support environmentally responsible travel.

The plan prioritises strong, legible pedestrian and cycle connections both within the site and to key external locations, reducing reliance on car travel. Residents will benefit from a range of public parks, open spaces, and play areas.

Multifunctional green and blue infrastructure will promote biodiversity and sustainable water management, while a station link will enhance connectivity to the wider region, encouraging the use of public transportation.

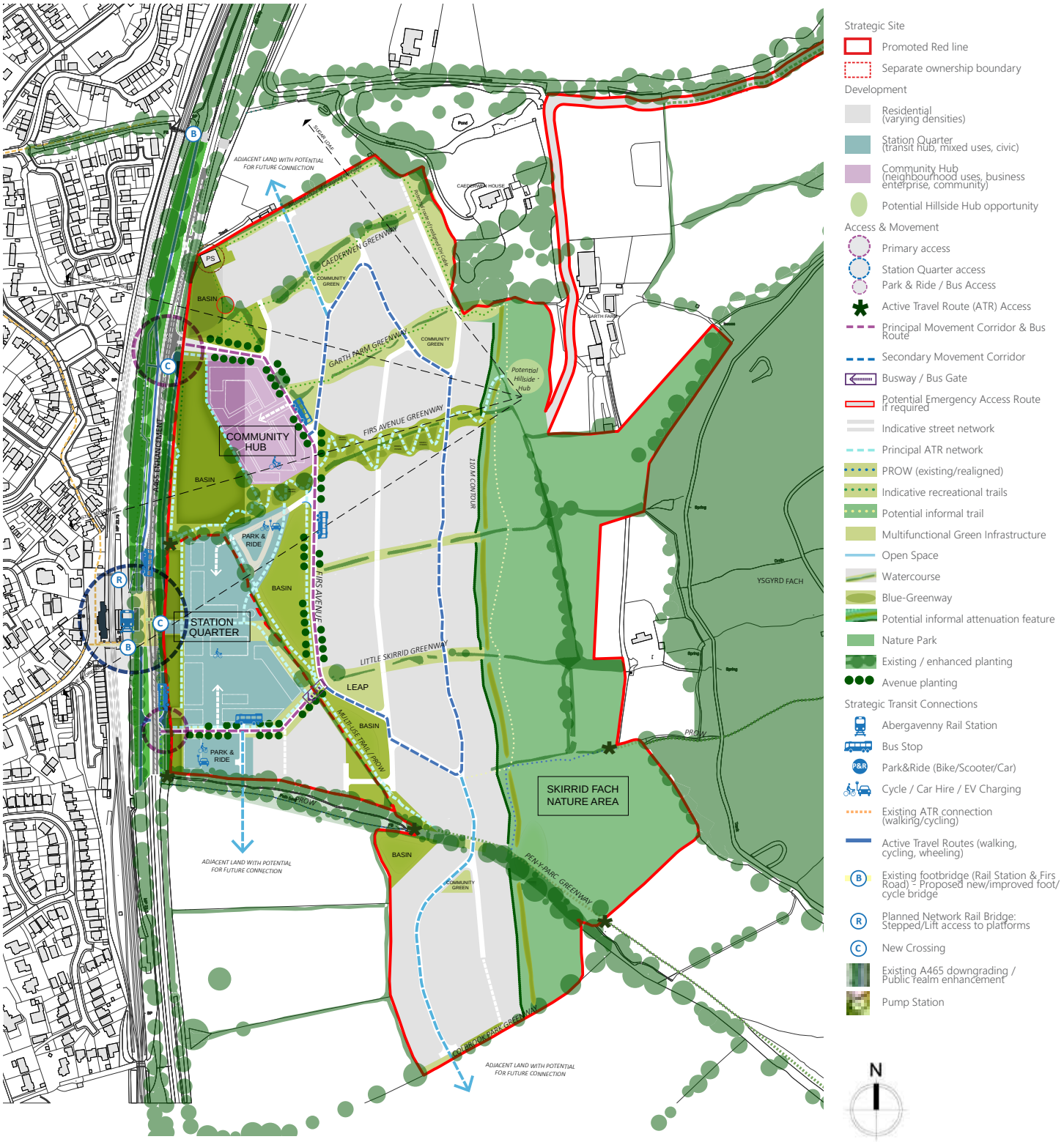
A Development Framework Masterplan has been created, providing a foundation for the development.

Illustrative Concept Masterplan



DEVELOPMENT FRAMEWORK MASTERPLAN

Strategic Site Development Framework Masterplan (Drawing Ref: 2477_SS-DFM-01_Development Framework Mplan_A3_)



Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

NEW HOMES

The development located within the red line area can deliver 500 homes during the period, including 50% affordable homes.

A diverse mix of affordable open market, intermediate and social rented homes will be provided to ensure the settlement remains balanced and meet the key issue of the RLDP to rebalance the ageing demographic, provide opportunities for younger demographics/ first time buyers and community and placemaking objectives.

Homes will be energy-efficient, built to Net Zero standards, and packed with features to cut carbon emissions and lower living costs. These include southerly facing roofs primed for solar PV, on-plot electric vehicle charging, superior insulation to reduce energy loss, and smart home tech to optimise efficiency. Generous landscaped gardens and planting will provide create opportunities for sustainable gardening and food growing.

Density

A range of densities will be accommodated across the development ranging from 25 to 120 dwellings per hectare, sensitively reducing along the sites outer, upper edges and increasing around the Station Quarter, Community Hub and Main Avenue. Refer to Density Plan illustrating the density strategy.

Sensitivity

All homes will be strategically located below the critical 110m contour to minimise landscape visual impact and preserve the natural aesthetic of the surrounding area. This thoughtful placement ensures that developments harmonise with the existing topography, maintaining sight lines and reducing visibility from key vantage points. By integrating the homes into the landscape, this approach balances development with environmental stewardship and visual integrity.

High quality homes set designed to appropriate densities









STATION QUARTER

The Station Quarter is a transformative mixed-use district and destination that redefines connectivity and community through sustainability and innovation.

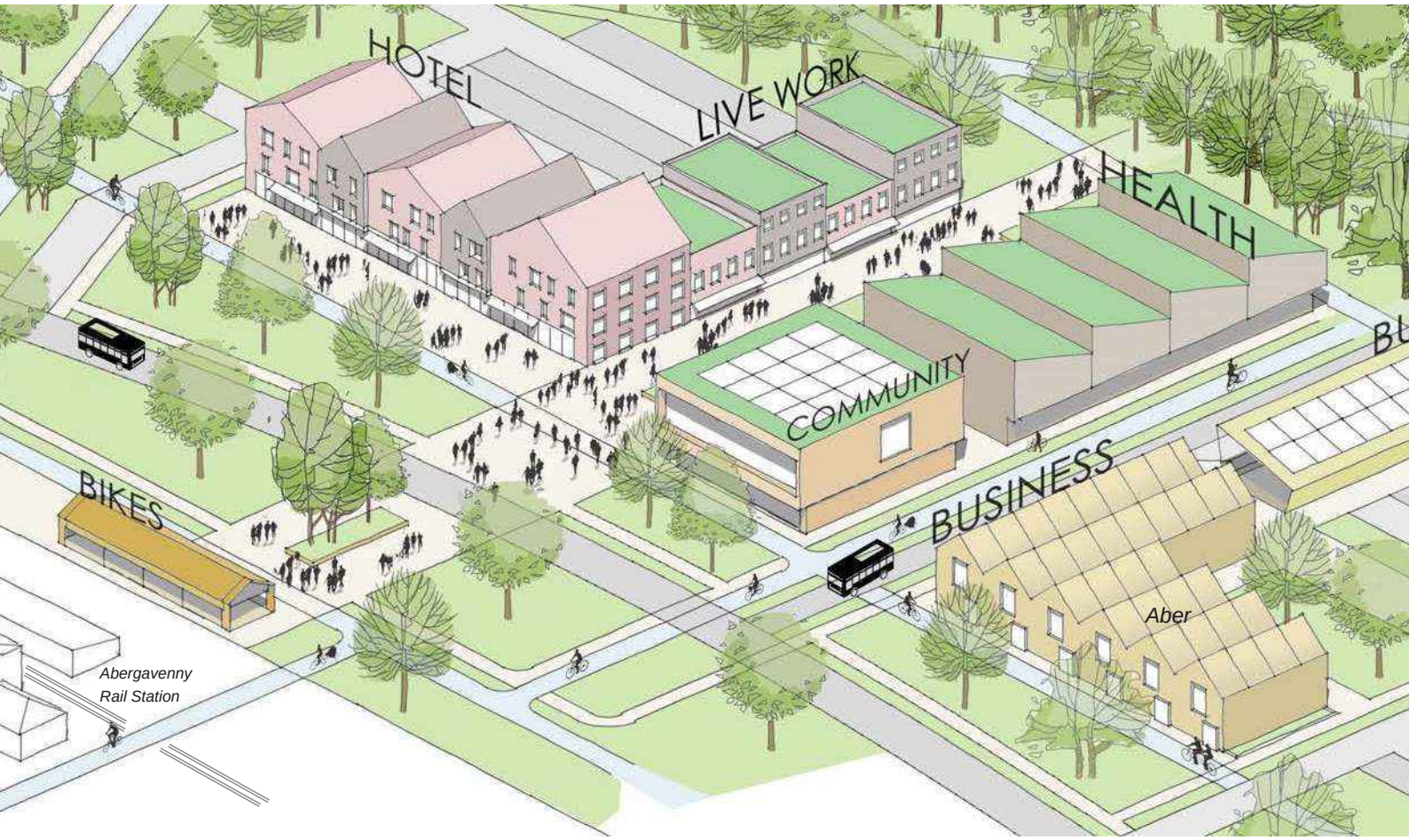
At its heart lies a vibrant pedestrian plaza, seamlessly linking the neighbourhood to Abergavenny Station via the re-purposed A465 Avenue, designed with people and cyclists at its forefront. This thoughtfully crafted space fosters walkability, encourages active transportation, and creates a safe and inviting environment for all.

The Station Quarter offers a dynamic and adaptable blend of uses, balancing community vitality, business opportunities, and transit efficiency. It provides a flexible framework for a range of activities, from entrepreneurial ventures to collaborative workspaces, health-focused amenities, modern residential living, and a hotel. A Park-and-Ride interchange ensures seamless mobility while reducing car reliance.

Sustainability is prioritised throughout, with green infrastructure promoting biodiversity and energy-efficient buildings powered by renewable energy.

The district supports an inclusive, resilient community where residents, locals, and visitors alike can gather, connect, and thrive.

Indicative concept diagram showing vibrant, connected Station Quarter



COMMUNITY HUB

The Masterplan concept introduces two distinctive, higher-density courtyard environments, each thoughtfully designed to serve complementary purposes while fostering community, connectivity, and a sense of belonging. These courtyards, integrated with the Station Gateway, are characterised by a local and residential feel, balancing vibrancy with privacy.

Community Courtyard

At the heart of the development lies the Community Courtyard, a dynamic hub for local life. Centred around a landscaped gathering space, it fosters social interaction, activities, and community engagement.

The central courtyard offers a vibrant environment with seating, greenery, and spaces for both formal and informal gatherings. It features flexible areas for events, pop-up markets, and seasonal celebrations, with spill-out zones from cafés or community rooms that enhance the indoor-outdoor experience.

Key amenities surrounding the courtyard include:

- A family-friendly café or niche retail space with outdoor seating.
- Multi-purpose community rooms for local events, workshops, and group activities.
- Co-working spaces equipped with meeting rooms and reliable internet to support remote workers and small businesses.
- The flexible building design allows for essential services, such as a crèche, to cater to working families. Pathways link the courtyard to nearby green spaces and trails, expanding its functionality and enhancing its role as a community anchor.

Neighbourhood Courtyard

Complementing the Community Courtyard is the more private Neighbourhood Courtyard, designed as a flexible, mixed-use environment that balances functionality with a residential focus. This space accommodates a variety of uses, creating an intimate yet dynamic setting for residents and select businesses.

The Neighbourhood Courtyard supports:

- Residential Living- town houses, maisonettes, and apartments border the courtyard, with balconies and terraces providing private outdoor spaces that overlook and connect to the communal areas. These homes form part of First Avenue and overlook the inner courtyard and southern landscapes.
- Mixed-Use Flexibility: Small-scale businesses, creative studios, or niche retail spaces are integrated into the courtyard, fostering a semi-private yet engaging atmosphere. A tranquil and enclosed design promotes relaxation and privacy, while landscaping and spill-out areas create opportunities for small gatherings or creative activities.

Linking the Courtyards

The courtyards are interconnected by a well-designed public realm. A vibrant 'exchange zone' blends the community-focused and private spaces. This zone offers flexible areas for workshops and small businesses, with spill-out spaces encouraging interaction.

Both courtyards link to a wider network of public pathways, ensuring easy access from the Station Gateway and connections to surrounding residential areas and green-spaces, promoting recreation and a stronger connection to nature.







An indicative concept diagram illustrating the Community Hub 'courtyards' as a vibrant focal point for local life. The courtyards foster strong links between indoor and outdoor areas, creating a welcoming and multifunctional environment that promotes a sense of belonging for residents and visitors alike.



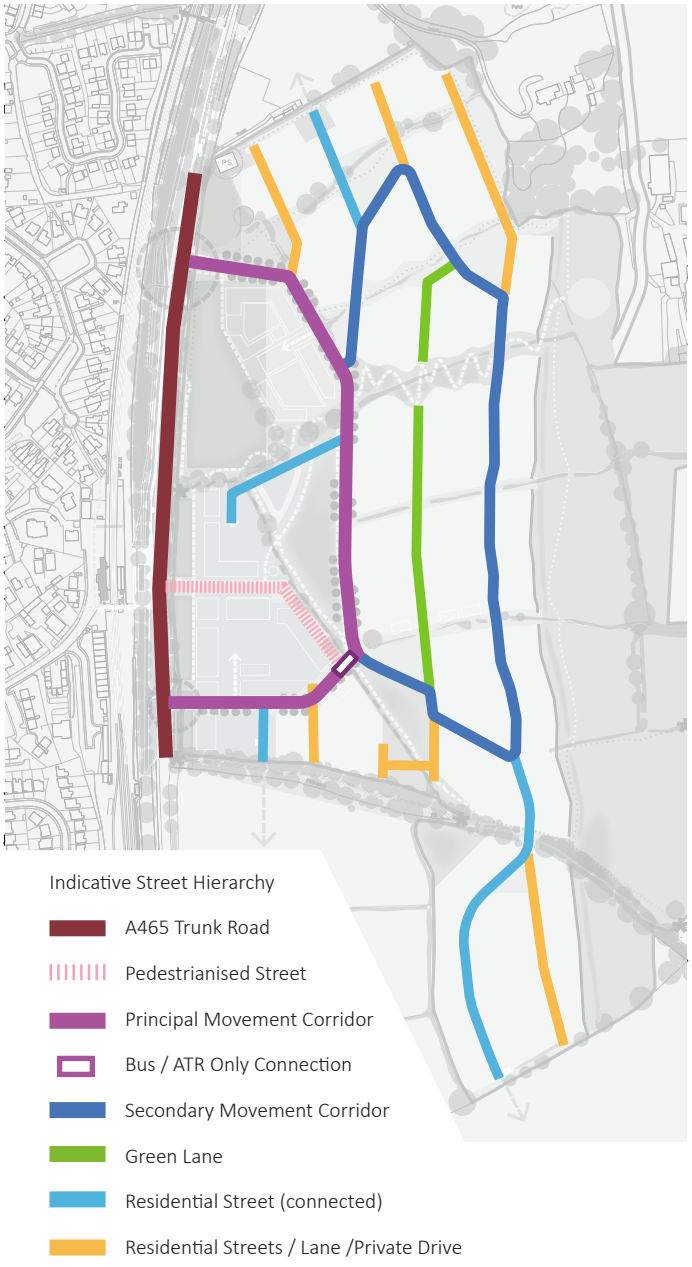
STREET HIERARCHY

The proposed street hierarchy plan creates a legible, connected layout prioritising pedestrians, cyclists, and sustainable transport, while ensuring efficient vehicle access where necessary. The hierarchy is illustrated right. In line with Manual for Streets principles, the design reduces the impact of vehicles, prioritising active transport modes. The streets will be direct, safe, and well-connected, with varied street widths, surface materials, and landscaping strategies to create a sustainable, cohesive urban environment. The character and identity of each street will vary, incorporating a mix of street widths, surface materials, and landscape planting strategies that contribute to a diverse, cohesive, and sustainable urban environment.

Re-purposing of the A465 Trunk Road

A key component of the access strategy is the re-purposing of the A465 Trunk Road. It is proposed to downgrade the A465 to 30MPH, transforming it into a pedestrian- and cyclist-friendly thoroughfare. This change will reduce vehicle reliance while improving accessibility for all transport modes. The corridor will prioritise walking and cycling with wide pathways, cycle lanes, and green infrastructure. Dedicated bus and cycle lanes will ensure efficient public transport. Vehicular access will be carefully managed to minimise traffic impact, supporting sustainable goals while still providing necessary access. This transformation will make the A465 Corridor an environmentally-conscious gateway into the development, improving both functionality and appeal.

Street Hierarchy





SUMMARY

This Placemaking Booklet outlines how the proposed development of Land East of Abergavenny, A465 adopts a design-led approach to deliver a vibrant, sustainable, and inclusive mixed-use neighbourhood. The vision integrates homes, local facilities, employment opportunities, and green infrastructure to create a balanced community that supports healthy lifestyles, social interaction, and economic growth. The proposal aligns with key placemaking goals and policy frameworks:

- **Planning Policy Wales Placemaking Themes**
  Emphasising Strategic and Spatial Choices, Active and Social Spaces, Productive and Enterprising Places, and Distinctive and Natural Places to ensure a holistic approach to development.
- **National Sustainable Placemaking Outcomes**
  Focusing on sustainable communities, economic growth, efficient use of resources, environmental protection, and creating accessible and healthy environments.
- **Future Wales 2040 placemaking principles**
  Delivering a rich mix of uses, diverse housing types and tenures, walkable, dense neighbourhoods supporting public transport and local amenities, while integrating Green Infrastructure and creating permeable street networks.

PPW: Placemaking Themes



- **The Well-being of Future Generations Goals**
  Promoting a prosperous, resilient, and healthier Wales with equal, cohesive, and culturally vibrant communities responsive to global challenges.
- **TAN 12 objectives of good design**
  Embedding principles of access, character, community safety, environmental sustainability, and movement to create places people value.
- **Placemaking Principles**
  Upholding the core principles of the DCFW Placemaking Charter, with a people-centred, adaptable, and sustainable design.
- **Net zero design principles**
  Including energy-efficient buildings, renewable energy generation, and sustainable drainage systems, this phase will demonstrate a commitment to reducing carbon emissions.
- **Affordable homes**
  Delivering 50% affordable housing ensures equitable access to high-quality, sustainable homes, fostering a diverse and thriving community.

In summary, these elements collectively set the stage for a vibrant and interconnected new neighbourhood community that becomes a benchmark for sustainable and forward-thinking development.

MHA
Monmouthshire Housing
Tai Sir Fynwy

Abergavenny East Strategic Site
Density Framework Plan

Strategic Site

Promoted Red line

Separate ownership boundary

Indicative Density Range:
dwellings per hectare (dw/ha)

Higher Density (75 to 120 dw/ha)

Medium to Higher Density (50 to 70 dw/ha)

Medium Density (35 to 50 dw/ha)

Lower Density (25 to 35 dw/ha)

N

REV.	DESCRIPTION	DATE

CLIENT

Monmouthshire Housing Association

JOB TITLE

Abergavenny East

DRAWING TITLE

Strategic Site:
Density Framework Plan

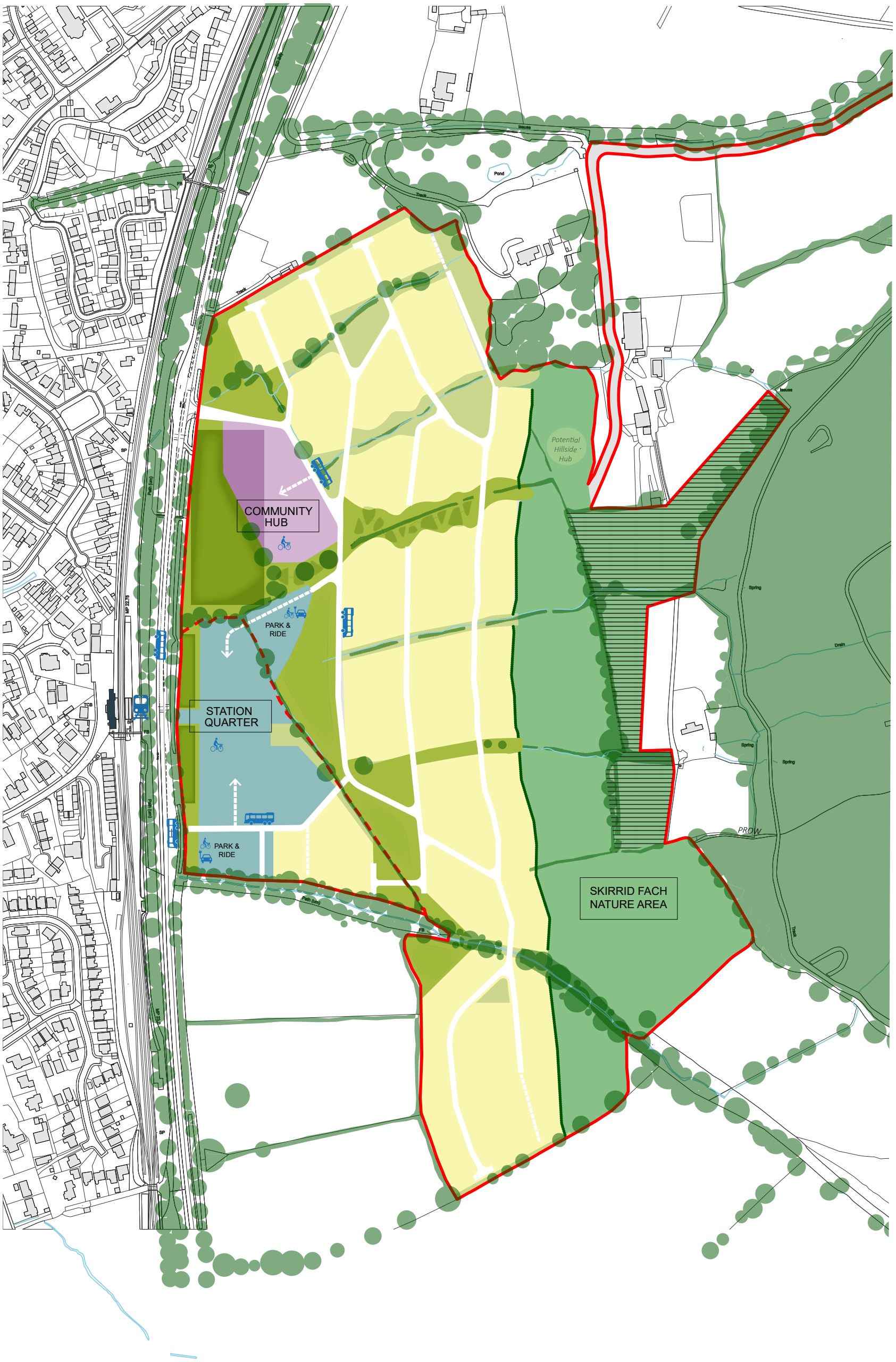
SCALE @ A3	DATE	DRAWN BY
1:4000	Dec '24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-DFP-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Abergavenny East Strategic Site
Land Use Framework Plan



Strategic Site

- Promoted Red line
- Separate ownership boundary

Land Use

- Residential (varying densities)
- Station Quarter (transit hub, mixed uses, civic)
- Community Hub (neighbourhood uses, business enterprise, community)
- Potential Hillside Hub opportunity

Access & Movement

- Abergavenny Rail Station
- Bus Stop
- Park&Ride (Bike/Scooter/Car)
- Cycle / Car Hire / Charging
- Indicative street network

Multifunctional Green Infrastructure

- Open Space / GI / SUDS
- Watercourse
- Blue-Greenway
- Attenuation area
- Nature Area
- Existing / enhanced planting
- Indicative location of Local Equipped Play Area (LEAP)
- Indicative location of Local Area of Play (LAP)

N

REV.	DESCRIPTION	DATE

CLIENT
Monmouthshire Housing Association

JOB TITLE
Abergavenny East

DRAWING TITLE
Strategic Site:
Land Use Framework Plan

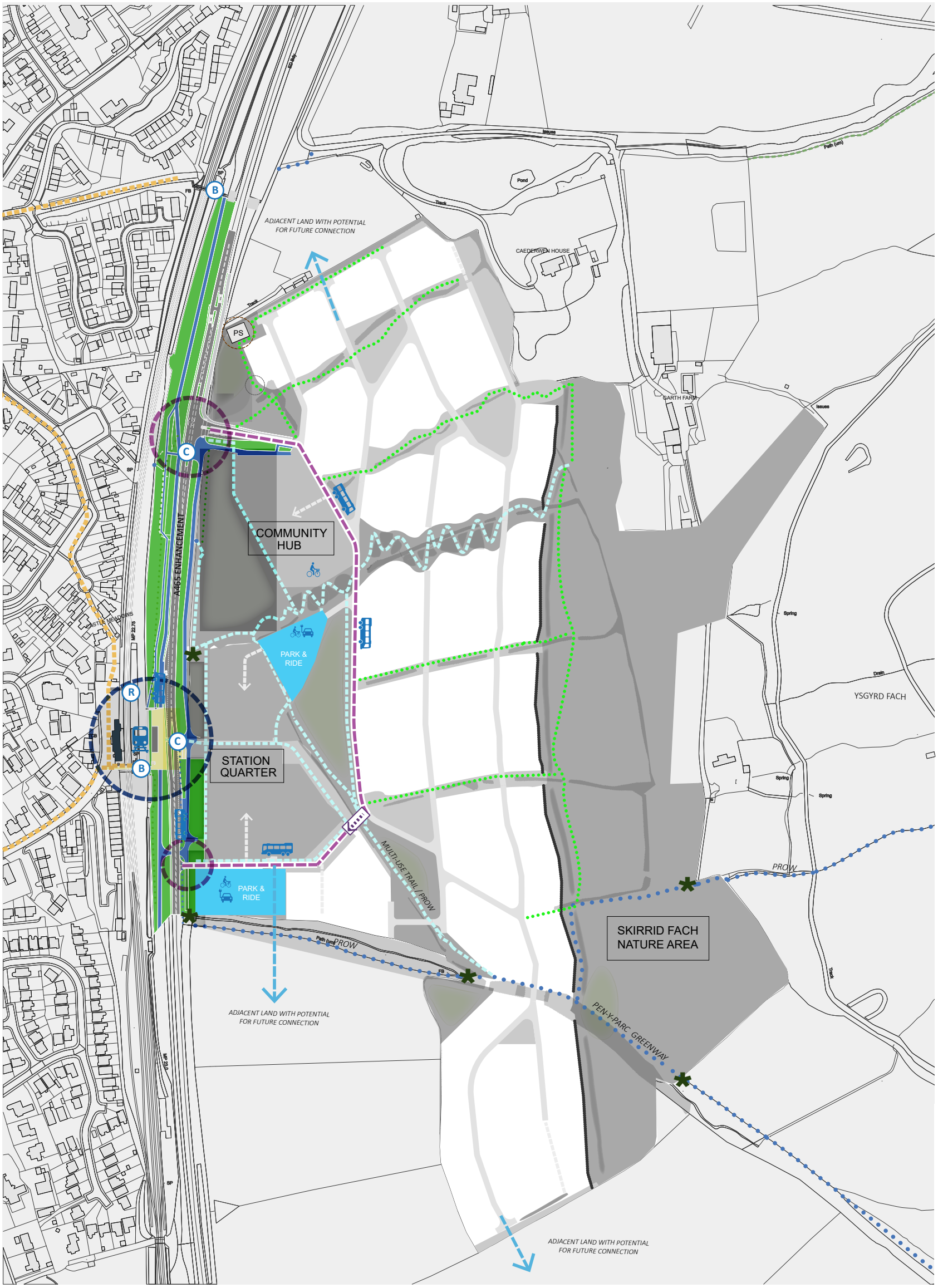
SCALE @ A3	DATE	DRAWN BY
1:4000	Dec ‘24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-LUF-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Abergavenny East Strategic Site
Movement Framework Plan



Strategic Site

- Promoted Red line
- Separate ownership boundary

Access & Movement

- Primary access
- Station Quarter access
- Park & Ride / Bus Access
- Active Travel Route (ATR) Access
- Principal Movement Corridor & Bus Route
- Secondary Movement Corridor
- Busway / Bus Gate
- Potential Emergency Access Route if required
- Indicative street network
- Principal ATR network
- PROW (existing/realigned)
- Indicative recreational trails

Strategic Transit Connections

- Abergavenny Rail Station
- Bus Stop
- Potential Park&Ride (Bike/Scooter/Car)
- Cycle / Car Hire / EV Charging
- Existing ATR connection (walking/cycling)
- Active Travel Routes (walking, cycling, wheeling)
- (B) Existing footbridge (Rail Station & Firs Road) - Proposed new/improved foot/cycle bridge
- (R) Planned Network Rail Bridge: Stepped/Lift access to platforms
- (C) New Crossing
- Existing A465 downgrading / Public realm enhancement

N

REV.	DESCRIPTION	DATE

CLIENT: Monmouthshire Housing Association

JOB TITLE: Abergavenny East

DRAWING TITLE: Strategic Site: Movement Framework Plan

SCALE @ A3	DATE	DRAWN BY
1:4000	Dec '24	GB
JOB NO.	DRAWING NO.	REVISION
2477	SS-MOV-01	

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Ltd 2024
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

Do not scale from this drawing. Ordnance Survey © Crown Copyright and database rights 2024. OS AC0000813445

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Monmouthshire Housing Association (MHA)	GJP
Address:	[redacted]	
Telephone No:		

Email:	[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the key issues, challenges, vision and objectives of the Deposit RLDP.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the Plan's Growth Strategy.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Plan's Spatial Strategy.		

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Managing Settlement Form policies in the Deposit RLDP.		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the Plan's design and sustainable placemaking policies.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA object to the current wording of Policy NZ1. Please refer to the submitted representations for more detail.		

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the green infrastructure, landscape and nature recovery policies.		

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the infrastructure policies.		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the housing policies set out in the Deposit RLDP.		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA object to the current wording of Policy HA1 'Land to the East of Abergavenny' and suggest revisions accordingly. Please refer to the submitted representations for more detail.		

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the economic policies.		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the employment site allocations. Please refer to the submitted representations for further detail.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the visitor economic policies.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	Support
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In principle, MHA support the sustainable transport policies.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	Objection

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

MHA object to the current wording of Policy RC4 'New Retail Proposals Outside of Identified and Local Town Centres' and suggest revisions accordingly. Please refer to the submitted representations for more detail.

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the community infrastructure and open space polices.

17.	Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)	
Is your representation in support or objection?	Support:	Support
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In principle, MHA support the mineral and waste policies.

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	Objection
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. MHA supports the overall aims and objectives of the Deposit Plan, however, have made comments and objections to the wording of specific policies within the plan, and suggest revisions accordingly. Please refer to the submitted representations for more detail.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	No
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area ✓	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ✓	

in light of the evidence)?	

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

MHA supports the overall aims and objectives of the Deposit Plan, however, have made comments and objections to the wording of specific policies within the plan, and suggest revisions accordingly. Please refer to the submitted representations for more detail.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	Yes
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	English

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the

Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

2005

Vistry Group

POLICY HA7 – LAND AT DREWEN FARM, MONMOUTH

Introduction

Vistry Group fully supports Monmouthshire County Council (MCC's) intention to allocate land at Drewen Farm, Monmouth for residential development as per Policy HA7 of the Deposit Replacement Local Development Plan (LDP).

An outline planning application was submitted in October 2024 for residential development of up to 110 dwellings with landscaping, public open space and associated infrastructure works at Drewen Farm, Monmouth. The application is currently pending determination (application reference: DM/2024/01295). This planning application seeks to permit residential development for the remainder of the Strategic Site – Wonastow Road, Monmouth (SAH4) allocated in the adopted MCC LDP (2011 – 2021). The Proposed Development will provide immediate delivery of affordable and market homes as it will be built out in 2025/26.

The MCC Revised LDP Deposit Plan (October 2024) recognises the value of the site to deliver new homes in Monmouth by seeking to carry forward the residual SAH4 allocation land, ensuring its delivery in the next plan period. The submission of the planning application at Drewen Farm demonstrates Vistry Group's commitment to delivering new homes at this site.

The remainder of this response seeks to demonstrate that the submitted outline planning application (application reference: DM/2024/01295) complies with the requirements of the Deposit Plan Policy HA7.

Accordance with Policy HA7 – Land at Drewen Farm, Monmouth

The relevant parameters, placemaking principles and development requirements of Policy HA7 are set out in Table 1 below, together with details of how the submitted outline planning application (application reference: DM/2024/01295) accords.

Table 1: Accordance with Policy HA7 - Land at Drewen Farm, Monmouth

Development Requirement	Application DM/2024/01295 accordance
Total Homes Approx. 110 homes, (55 open market homes, 55 affordable homes)	The submitted application is for the development of 110 dwellings and makes provision for at least 35% affordable housing. Should the planning application be determined following the adoption of the Replacement LDP, the quantum of affordable housing delivered will be increased to 50%.
Sustainable Communities Incorporation of lower densities along the boundaries of the open countryside responding to its edge of settlement location.	The development footprint indicated on the Illustrative Masterplan has been derived following detailed analysis and careful consideration of the surrounding context and character of the wider area. The proposals are structured around the existing landscape features of the site, retaining existing hedgerows and trees wherever possible. 48% of the site is proposed for open space, SuDS and rainwater gardens, with a range of functions and character which will provide ecological and visual benefits. The scale and massing of buildings will be a maximum of 2-storey height and focussed towards the centre of the site, creating a sense of integration with the surrounding countryside and a natural edge to this area of Monmouth.
Green Infrastructure, Landscape and Nature Recovery Existing boundary features to be enhanced with additional hedgerow and tree planting to mitigate for	The retention of habitats with appropriate development buffers is a key principle of the planning application and has been embedded in the Illustrative Masterplan and Landscape Strategy. Most of the hedgerow network on-site and all on-site trees are proposed to be retained, enhanced

development and respond to its edge of settlement location. Requirement of additional GI connectivity and buffers between sensitive habitats and built development, and areas adjacent to the Wonastow Field SINC.	and protected with new belts of ecotone planting which will create a natural edge between development at Monmouth and the surrounding countryside. The proposals also seek to ensure the development footprint is sufficiently offset away from the boundaries of the application site through the provision of further significant habitat buffers measuring between 5m and 30m. Continued function of the hedgerow network is enabled via proposed biodiverse, ecotone planting within habitat buffers. The Illustrative Masterplan demonstrates the proposed incorporation of significant areas of Green Infrastructure to support newly created and retained habitats. Wonastow Road SINC lies immediately to the south of the site and the planning application proposes to route a potential drainage option through the SINC. Detailed supplementary assessment work is currently underway and will be submitted in support of the planning application to confirm the proposed measures to prevent any impact on the SINC. This is expected to include submission of a detailed Construction Environmental Management Plan and possible commitment to alternative construction methods.
Sustainable Travel and Highways Provision of on and off-site measures to provide good quality, attractive, safe, legible and accessible pedestrian and cycle linkages both to and within the new development area. Key connections include PROW MCC-M17B, future PROW route MCC-M17A along Watery Lane and into the adjacent Kingswood Gate site allowing links to further active travel routes in Monmouth. Provision of access to the development and off-site highway improvements that are deemed necessary are subject to the approval and agreement of the Highway Authority. Financial contributions are required to improve public transport services and nearby infrastructure.	The Transport Assessment submitted in support of the planning application concludes that the safe and suitable vehicle access to the application site can be provided via Kingswood Gate. It also concludes that the existing highway infrastructure within Kingswood Gate is appropriate to serve the numbers of new car trips that would be generated by the scheme. The Illustrative Masterplan facilitates new pedestrian and cycle links including an east-west route to the future PROW route MCC-M17A along Watery Lane. This will enhance connectivity for both new residents and the residents of the existing Kingswood Gate development into Monmouth. Pedestrian access points are also incorporated along the southern boundary of the application site to ensure the integration of PROW MCC-M17B and the proposed MCC active travel connection. An indicative off-site improvement scheme is proposed to Watery Lane as set out in the Transport Assessment which is likely to comprise lighting columns and wayfinding signage to promote its use as an active travel route. The need for any further financial contributions will be discussed as the planning application progresses towards determination.

Conclusion

The principle of the residential development of Land at Drewen Farm, Monmouth has already been established through the allocation of the site in the MCC adopted LDP. The Replacement LDP recognises the value of the site's contribution towards delivering new homes in Monmouth by seeking to carry forward its allocation into the new plan period. Its allocation in the Replacement LDP presents an opportunity not only to deliver new homes but also to improve the connectivity between the existing Kingswood Gate development and the wider area.

Overall, the outline planning application (DM/2024/01295) made by Vistry Group wholly accords with the allocation requirements presented within the Deposit Plan therefore demonstrates a clear delivery mechanism for Policy HA7 – Land at Drewen Farm, Monmouth to be realised.

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:	[redacted]	[redacted]
Job Title: (where relevant)		
Organisation: (where relevant)	Vistry Group (c/o Agent)	RPS
Address:		[redacted]
Telephone No:		[redacted]
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	x
	Objection:	

We fully support the intention to allocate land at Drewen Farm, Monmouth for residential development.

Please see full accompanying statement in relation to Policy HA7 – Land at Drewen Farm, Monmouth.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	

N/A

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	

N/A

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

N/A

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	x
	No:	

If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	
	No:	x
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the

Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:	[redacted]	[redacted]
Job Title: (where relevant)		
Organisation: (where relevant)	Vistry Group (c/o Agent)	RPS
Address:		[redacted]e
Telephone No:		[redacted]
Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x

A portion of candidate site CS0277 has been allocated for residential development under draft Policy HA7 of the Monmouthshire County Council (MCC) Deposit Replacement Local Development Plan (LDP) – Land at Drewen Farm, Monmouth. Vistry Group wishes to confirm support for the allocation of Land at Drewen Farm in the Replacement LDP as an important contribution to delivering new homes at the County town of Monmouth.

The remainder of CS0277 is located immediately to the west of Monmouth. Residential development at this location would be wholly in accordance with Deposit Plan Strategic Policy S1 and Strategic Policy S2 which seek to focus growth at the County's most sustainable settlements.

Please see full accompanying statement in relation to Candidate Site CS0277 – Further Land at Drewen Farm, Monmouth

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

14. Do you have any comments on the sustainable transport policies?

(Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
N/A		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	x
	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): N/A		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	
	No:	
	Welsh:	

If you wish to speak at a hearing session which language would you wish to use?	English:	

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

CANDIDATE SITE CS0277 – FURTHER LAND AT DREWEN FARM, MONMOUTH

RLDP Strategy for residential growth

The Monmouthshire County Council (MCC) Local Housing Market Assessment (LHMA) Refresh 2022-2037 identifies over 2,000 households within the county in need of affordable housing. The LHMA also estimates a need for 126 market homes throughout the County per year, consisting of 86 private rented (68%) and 41 owner occupier properties (33%). The most recent Annual Monitoring Report (2022-2023) stated that:

"Housing delivery records covering the 10-year plan period 2011 - 2021 set out that the Plan has delivered 658 affordable homes compared to a target of 960 affordable homes (a shortfall of 302 affordable homes). Proportionately, this shortfall is almost identical to the shortfall in total housing delivery".

There is an urgent need to deliver new homes in Monmouthshire – both market and affordable. Given this trend to-date of under-delivery, the requirement for on-site provision of 50% affordable homes on all new site allocations as per Policy S7 has the potential to be prohibitive to the delivery of much needed homes.

The Deposit Plan should allocate additional provision for housing in sustainable locations comprising market housing with a proportionate provision for affordable dwellings. As a County town, Monmouth is well-placed to accommodate sustainable growth.

CS0277 – Further Land at Drewen Farm, Monmouth

A portion of candidate site CS0277 (see red edged land below) has been allocated for residential development under draft Policy HA7 of the MCC Deposit Replacement Local Development Plan (LDP) – Land at Drewen Farm, Monmouth. **Vistry Group wishes to confirm support for the allocation of Land at Drewen Farm in the Replacement LDP as an important contribution to delivering new homes at the County town of Monmouth.**

The remainder of CS0277 (see blue edged land below, referred to hereafter as the 'further land') is located immediately to the west of Monmouth. Residential development at this location would be wholly in accordance with Deposit Plan Strategic Policy S1 and Strategic Policy S2 which seek to focus growth at the County's most sustainable settlements.

Land at Drewen Farm will be delivered in the period 2025 to 2026. The further land subject of CS0277 is anticipated to have the capacity to deliver around 200 homes and could be commenced in the next 5 years, securing onward housing delivery and bolstering the delivery of urgently needed affordable homes.



Given the edge of settlement location of the further land, which lies adjacent to the existing Kingswood Gate development and Land at Drewen Farm (subject to draft Policy HA7), it presents a viable opportunity to deliver sustainable residential growth at Monmouth.

It is acknowledged that for residential development at this location to be appropriate it will need to exhibit a strong green infrastructure led approach to ensure integration into the surrounding landscape. Policy requirements in this respect would be comparable to those set out under draft Policy HA7. The allocation of Land at Drewen Farm under draft Policy HA7 establishes the acceptability of development at this location. On this basis, it is considered that the further land can also be developed in such a way that does not unacceptably compromise the environmental characteristics of the site itself or the location in which it sits. In allocating land to the west of Monmouth in the adopted LDP under Policy SAH4 – Wonastow Road, growth to the west of Monmouth has been established.

The remainder of this representation seeks to present that the further land is suitable, available and achievable to accommodate growth to the west of Monmouth which is an established location for growth.

Sustainable location for growth

The further land represents a sustainable location for growth which could direct new residential development at the County town on Monmouth, in accordance with the settlement hierarchy.

By virtue of allocation of Land at Drewen Farm for residential development (Policy HA7), the Deposit Plan acknowledges that residential development in the west of Monmouth is sustainable when considering distance to key services, amenities and employment. In this respect, MCC has established in principle that the further land is sustainably located for residential growth.

The further land comprises two parcels (‘northern’ and ‘western’). As per guidance from the Institution of Highways & Transportation, 2km is deemed a ‘reasonable’ walking distance. Considering this, the following key services are located within walking distance of both parcels:

- Employment (800m from Wonastow Road Industrial Site at the furthest point)
- Primary School
- Health Centre
- Convenience Store
- Pharmacy
- GP Surgery
- Supermarket

Several Public Rights of Way (PRoWs) run in the locality of the further land which provide good connectivity towards the south and the west into Monmouth. The outline planning application submitted in respect of Land at Drewen Farm (application reference: DM/ 2024/01295) proposes off-site improvements to the active travel link along Watery Lane (which lies east of the further land) and facilitates access to the south where MCC has proposals to deliver a new active travel link. Clearly, directly new housing growth to locations that are prioritised for investment in active travel is pertinent.

Local landscape

As per the Monmouthshire Landscape Sensitivity Study (2019), the Local Landscape Sensitivity of the further land is 'medium' (LCA M07). This is the lowest sensitivity of the 16 local landscape character areas of Monmouth.

The Inspector's Report on the Examination of the MCC LDP (2014) states that *"all of the landscape around Monmouth is visually attractive but, in comparison, this zone [the Wonastow Road area] is the least sensitive and has the highest capacity; it is therefore appropriate that development is allocated in this zone".* This assessment remains applicable.

With the use of sensitive design parameters and a green infrastructure led approach, residential development of the further land can be successfully assimilated into the host landscape. This can be achieved by careful siting and wrapping against the boundary of Kings Wood Gate on the low-lying areas of the site, concurrent with the retention, protection and enhancement of locally characteristic features such as boundary hedgerows and trees creating a strong green infrastructure.

The further land presents an opportunity for housing to be delivered in the most sustainable location within Monmouth from a landscape character perspective.

Accordance with RLDP Objectives

As set out above, the further land is sustainable location for growth which accords with the Replacement LDP settlement hierarchy and directs development to an established area of growth at the County settlement of Monmouth.

Table 1 overleaf confirms that residential development at the further land contributes to and accords with the relevant Replacement LDP Objectives as per the Strategic Framework of the Deposit Plan.

Table 1. Accordance of the further land with the objectives of the Replacement LDP

Objective Number	Replacement LDP Objective	Accordance
3	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and wellbeing. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	There are no statutory designated sites within the further land. As per the Monmouthshire Landscape Sensitivity Study (2019), the Local Landscape Sensitivity of the further land is 'medium' (LCA M07). The further land benefits from established boundaries comprising of mature hedgerows and hedgerow trees which would be retained and enhanced should the site be developed. Following the approach taken in the planning application for the Land at Drewen Farm, development could be focussed along the existing residential development with significant green infrastructure creating a natural edge to the further land. With a well-considered landscape strategy, development could be assimilated into the host landscape at this location. The further land is located 1.5 km east of the River Wye SAC and SSSI and within 4 km of the Wye Valley and Forest of Dean Bat Sites SAC designated for its populations of lesser horseshoe and greater horseshoe bats. It is not however, located within a Juvenile Sustenance Zone for either species. With respect to non-statutory designations, Wonastow Field SINC is immediately adjacent to the allocated site, with a further six SINCs located within 1km. Given the separation between the further land and the SINC, it is not anticipated that development would impact the SINC. The ecological baseline of the further land is known, and the site is of sufficient size and extent to enable development proposals to flexibly avoid and/or mitigate for any significant ecological constraints and compensate for any unavoidable loss of ecologically valuable habitats. This would be achieved through the enhancement and long-term management of retained habitat features in addition to new habitat creation. A green infrastructure-led approach would be adopted to achieve co-benefit in terms of landscape and ecology in accordance with Objective 3.
4	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from	The site is identified within Flood Zone A – little or no risk of fluvial and tidal flooding according to the Natural Resources Wales (NRW) published flood risk development advice map. The site is also identified as Flood Zone 1 according to the new Technical

Objective Number	Replacement LDP Objective	Accordance
	flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.	Advice Note 15 Flood Map for Planning which is the most up-to-date source of information in respect of flood risk. No other sources of flooding have been identified for the further land, including flooding from groundwater, sewers and artificial sources. To manage discharge of surface water flows, a sustainable drainage system (SuDS) would be incorporated into the masterplan of the site, in accordance with the requirements of the Monmouthshire Sustainable Drainage Approval Body (SAB). Accordingly, the further land can be developed to satisfy Objective 4.
6	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire. • protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. • support the adaptation and re-use of existing sustainably located buildings.	The Deposit RLDP acknowledges that housing growth in Monmouth is necessary to address the key issues, challenges and opportunities identified across the plan period. It acknowledges that brownfield opportunities within the County are limited. Edge of settlement opportunities such as the further land present the best use of greenfield land to deliver the aims of the Replacement LDP. The agricultural quality of the site is predominantly Grade 2, with some localised areas of Grade 3a and Grade 3b. Notwithstanding, land identified under draft Policy HA4 also contains a similar composition of best and most versatile agricultural land. The further land presents an opportunity for residential development to be sustainably located at an edge of settlement location in accordance with Objective 6 which recognises the constraints associated with the availability of land.
8	To improve access for all to recreation, sport, leisure activities, open space and the countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.	It is anticipated that MCC would apply criteria similar to Policy HA7 to an allocation for the further land which would require a green infrastructure led approach. Any masterplan for the site would be required to be landscape led providing meaningful and multifunctional public open spaces for new and existing residents in the locality. Development of the further land can be delivered in accordance with Objective 8.

Objective Number	Replacement LDP Objective	Accordance
9	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	By virtue of accommodating 50% affordable housing, the Further Land will provide opportunity for the younger population to live and work in Monmouthshire contributing to the creation of a more balanced demography within Monmouth.
10	To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	The further land presents a viable opportunity to provide development that will deliver 50% affordable housing to meet additional sustainable residential growth required within Monmouth in accordance with Objective 10.
11	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	The further land is able to accommodate a comprehensive and sustainable form of residential development with strong placemaking credentials. Development of this land would comprise an urban extension to the existing settlement boundary of Monmouth. There are existing homes of mixed tenure to the east and west. Development of this site therefore can form part of an already well integrated and diverse community. The homes provided could cater for a range of needs (age and health) and affordability. Placemaking principles and sensitive design parameters will be embedded into the master planning process to ensure successful assimilation into the host landscape. Development of the further land can be achieved in accordance with Objective 11.
14	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in place or can be provided to accommodate new development.	The further land is in walking distance of a broad range of facilities and services as outlined above. All utilities are available at the site, with new supplies proposed by utilising new connections to existing infrastructure in the local area. Development of the further land can therefore be achieved in accordance with Objective 14.
15	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	As discussed above, the principle of this location as a sustainable location has been established via the allocation of Land at Drewen Farm in the adopted LDP and draft Policy HA7 in the Deposit Plan. The further land is in walking distance of a broad range of facilities and services and is well-connected into the existing network of PRoWs and active travel links. Existing bus stops can be easily accessed on foot from the further

Objective Number	Replacement LDP Objective	Accordance
		land with onward services to Newport and Abergavenny. Development of the further land can therefore be achieved in accordance with Objective 15.
17	To strive to limit the increase in global temperatures to 1.5°C, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	Vistry Group actively seeks out opportunities to reduce the carbon footprint of their operations at every stage of the project lifecycle and throughout the supply chain. It was an early adopter of 'Fabric First' principles, an approach that has been endorsed through Zero Carbon Hub reports and proposals to Government when proposing the Zero Carbon Hierarchy. Vistry Group has carried out significant work ensuring their new homes are designed to be highly energy efficient by concentrating first on providing their customers with optimising built-in measures before turning to 'bolted on' renewable technology. Vistry Group's purpose is to deliver sustainable homes and communities across all sectors of the UK housing market. Key to this purpose is a successful and ambitious sustainability strategy. Vistry's strategy launched in 2021 and is focussed on three priority areas of People, Operations and Homes & Communities. It includes a commitment to setting carbon reduction targets consistent with reduction required to keep warming at 1.5°C and the development of a roadmap to deliver net zero carbon homes. An 'Energy and Sustainability Statement' has been submitted in support of the planning application for the Land at Drewen Farm. The principles of this statement would be comparable to those that would be adopted for development of the further land. Development of the further land can therefore be achieved in accordance with Objective 17.

Conclusion

This representation demonstrates that the further land is capable of accommodating a comprehensive and sustainable form of residential development with strong placemaking credentials at the County town of Monmouth. Such development accords with the Replacement LDP Objectives and directs growth towards an established location for growth at Monmouth.

On behalf of Vistry Group, we would welcome the opportunity to work with the Council to deliver the further land for residential development within the Replacement LDP.

2280

Candleston Homes

Monmouthshire County Council Replacement Local Development Plan – Deposit Plan Consultation Response

Prepared for:

Candleston Homes

Prepared by:

Savills
2 Kingsway
Cardiff
CF10 3FD

1. Introduction

1.1. Savills is instructed by Candleston Homes to provide a response to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by Monmouthshire County Council ('MCC').

1.2. The submission is made in the context of Candleston Home's position as the promoter of Site ID CS0192 ('Land off Old Hereford Road'). The site was originally submitted as a candidate site as part of the Stage 1 Call for Sites in November 2018. Candleston Homes submitted further documentation as part of the Stage 2 Call for Sites in August 2021 and has responded to consultations on the two versions of the Preferred Strategy in August 2021 and January 2023. As well as these formal consultations, Candleston Homes have also engaged with MCC informally in between.

1.3. Candleston Homes' site Land off Old Hereford Road site is not proposed to be allocated for housing with the Candidate Site Assessment Report (2024) providing the following reason:

> *'The site is not allocated as there is sufficient and more suitable land available for residential development within Abergavenny to accommodate its housing need.'*

1.4. There is no technical or environmental reason why the site is not proposed to be allocated and, instead, the Deposit RLDP proposes that it remains white land outside of, but adjacent to, Abergavenny's settlement boundary.

1.5. This supporting statement responds to the Deposit Plan consultation whilst Candleston Homes have also copied these responses directly into the requisite consultation response forms. The below table sets out the questions that are answered and, within these, which specific policies are commented on as well as Candleston Homes' position on these.

Question	Policy	Support or Object
2	Policy S1	Object
3	Policy S2	Object
4	Policy GW1	Support
9	Policy H9	Object
10	Policy HA4	Object

1.6. In general, Candleston Homes' position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. QUESTION 2 - Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

2.1. Candleston Homes provided comments as part of both consultations on the Preferred Strategy in connection to the RLDP's Growth Strategy with the representation on the January 2023 Preferred Strategy included as Appendix A.

2.2. Those comments centred on the fact that Growth Option 1 (which was effectively the continuation of the growth strategy presented in the 2021 version of the Preferred Strategy) should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (September 2022). The assessment of the Growth Options as presented in the Growth and Spatial Options Paper is replicated below:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

2.3. Whilst it is recognised that Welsh Government raised a non-conformity objection to the use of Growth Option 1, instead requiring the selection of Growth Option 2, Candleston Homes' position continues to be that it is unsound to select a growth option that performs less well in the analysis contained within the Growth and Spatial Options Paper September 2022 than other growth options that were considered but dismissed.

2.4. Candleston Homes' comments at that stage also suggested that, if Growth Option 2 were to be used (this being the option presented in the 2023 version of the Preferred Strategy and carried forward in the Deposit RLDP) then it needs to be uplifted to reflect:

- The increased level of net inflow from nearby English authorities in recent years rather than making an assumption of an average inflow from these authorities over a far longer period of time; and
- The divergence between the 2018-based household projections and the 2021 Census actual number of households. If this were to be extrapolated over the RLDP plan period, this could represent a significant under estimation of growth in households.

2.5. This is a sound and evidence-based approach and one which the Development Plans Manual allows for.

2.6. Candleston Homes also commented that the flexibility allowance should be increased from the 10% figure presented at Preferred Strategy stage and, in that sense, it is positive to see that the Deposit proposes that this is increased to 15%.

2.7. That said, Candleston Homes continue to have concerns that even this figure is inadequate based on the under delivery over the adopted LDP plan period where the 2022 Annual Monitoring Report's recognised that only 66% of homes planned for had been delivered.

2.8. The Development Plans Manual allows for the use of a bespoke flexibility allowance if properly evidenced and Candleston Homes suggest that the shortfall in housing delivery over the ALDP plan period provides that justification for the incorporation of a higher flexibility allowance. The science behind this approach is set out in more detail in Candleston Homes' comments on the Preferred Strategy.

3. QUESTION 3 - Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Question 4: Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

3.1. There are two elements of Policy S2 that Candleston Homes.

Spatial Strategy

3.2. The first is around the settlement hierarchy and how residential growth is to be distributed across the various tiers and settlements that comprise it. Abergavenny is shown as a Primary Settlement within Tier 1 with 22% of new homes to be directed towards it.

3.3. Overall, Candleston Homes support a spatial strategy that identifies Abergavenny at the top of the settlement hierarchy and directs a significant proportion of new homes towards it, something that the Deposit RLDP does.

3.4. That said, Candleston Homes note that, since the consultation on the Preferred Strategy, the spatial strategy has directed growth away from Abergavenny and instead towards the Minor and Major Rural Settlements as set out in the table below:

	Preferred Strategy		Deposit	
	% of Distribution	No. of Homes	% of Distribution	No. of Homes
Abergavenny	24	1,403	22	1,362
Rural Settlements	8	504	9	556

3.5. Candleston Homes question the fundamental soundness of a spatial approach which looks to direct a greater number of homes towards the third and fourth tier of the settlement hierarchy than the highest tier of the settlement hierarchy. Given that the spatial strategy is in turn informed by the Sustainable Settlement Appraisal (December 2022) which effectively ranks all settlements based on their sustainability, the effect is that the RLDP is directing a higher proportion of new homes to quantifiably less sustainable locations.

Table 2

3.6. Table 2 of the Deposit RLDP provides a summary of the spatial distribution of housing provision, effectively breaking down the number of homes to be delivered in each settlement into completions, commitments, allowances, rollover allocations, and new allocations.

3.7. Candleston Homes commented extensively on this as part of the Preferred Strategy and, again, these representations are re-attached to this Statement rather than repeated again within these representations. Nevertheless, Candleston Homes' concerns still remain that:

- Save for the flexibility allowance applied on the housing requirement, no specific allowance is made for either the non-delivery or reduced capacity of both the existing commitments and rollover allocations;
- In calculating the windfall allowances, no discount is applied to other tiers of the settlement hierarchy as it follows, equally, that the delivery of windfall sites in these settlements has also become more challenging over time;
- No allowance is made for demolition of existing properties required to facilitate the delivery of windfalls.

4. QUESTION 4 - Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

Policy GW1 – Green Wedge Designations

4.1. Policy GW1 (Green Wedge Designations) designates six Green Wedges across Monmouthshire with the location of these informed by a Green Wedge Assessment (March 2024) undertaken by LUC.

4.2. The Green Wedge Assessment effectively subdivides land surrounding settlements into a series of parcels and then assesses their performance against the five purposes as set out in Paragraph 3.67 of Planning Policy Wales Edition 12 (February 2024).

4.3. The site being promoted by Candleston Homes is split into two different parcels in the Green Wedge Assessment:

> AG9 – This covers the southern and eastern portion of the site that are adjacent to the northern edge of Abergavenny. It relates to the portions of the site where development is shown in the Landscape Masterplan (ref. 2566-04(02)104) prepared by Spring Design and submitted as part of Candleston Homes' response to the Preferred Strategy.
>
> AG10 - This parcel is located to the west of AG9 and covers the area between it and Old Hereford Road. It is shown as being undeveloped and used for public open space in the Landscape Masterplan (ref. 2566-04(02)104) prepared by Spring Design.

4.4. Candleston Homes has undertaken site specific landscaping work, submitting a Landscape Position Paper prepared by Zebra Landscape Architects in August 2021. It concludes that the lower part of the site (where development is proposed) has a lower sensitivity due to its stronger relationship with built development, existing residential curtilages at Underhill Crescent, and urban features such as the Deri View Primary School, car parking, and street lighting. Likewise, and from a visual perspective, the Position Paper concludes that the site, and particularly its southern part, will be seen in the context (and against the backdrop of) the settlement of Abergavenny and adjoining residential areas. The clear overall effect is that development here will be perceived as settlement edge.

4.5. In that sense, Candleston Homes support the approach taken to Parcel AG9 in the Green Wedge Assessment undertaken by LUC and agree with the exclusion of this parcel from the Green Wedge.

5. QUESTION 9 - Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

Policy H9 – Affordable Housing Exception Sites

5.1. Candleston Homes is the private housebuilding arm of the Melin Homes housing association and therefore their experience in delivering affordable housing means that they are well placed to comment on this policy.

5.2. As a starting point, Candleston Homes support the inclusion of an affordable housing exceptions policy within the Deposit RLDP. Such policies provide an important tool for delivering affordable housing, particularly in areas where that need is strong and where other sites that an LDP plans for either do not come forward, come forward slower than anticipated, or deliver fewer homes than forecast.

5.3. Looking at the five tests that need to be satisfied to comply with this policy, Candleston Homes have no comments on Tests A, B, D, or E. They seem appropriate and are typical of how such policies should function.

5.4. With regards to Test C, Candleston Homes have a concern around the strict use of an upper limit for the size of sites that can be permitted through Policy H9 though, if an upper limit is to be used, support that these upper limits reflect the position of settlements within the settlement hierarchy. The justification for using upper limits is presumably to address concerns around the clustering of such a quantum of affordable housing, the sustainability of sites to support a number of homes in excess of that upper limit, and the risk of affordable housing sites coming forward in isolated areas.

5.5. Candleston Homes' concern with the use of an upper limit is that there may be occasions where the shortfall in affordable housing delivery is such that it can only be met through sites that are larger than that upper limit. Likewise, it may be a better spatial planning approach to deliver an affordable housing shortfall on a single unconstrained site than across two separate sites that may be subject to constraints.

5.6. With that in mind, Candleston Homes therefore suggest that an exceptions element is added to this policy, allowing for sites to come forward in excess of upper limits set out in Test C so long as certain criteria are met. Such an approach is taken in Policy COM5 (Affordable Housing Exception Sites) of Bridgend County Borough Council's recently adopted Replacement Local Development Plan (included as Appendix B). That policy allows for affordable housing exception sites in excess of the identified upper limits subject to the below three tests being satisfied:

'a) There are no existing concentrations of affordable housing within the site's vicinity, which would be further compounded by the proposal;

b) The design, scale, layout and siting of the affordable homes will positively integrate with nearby existing communities to ensure the development will not result in a noticeable, isolated concentration of affordable housing; and

c) The proposal contains a sustainable mix of house types, sizes and tenures to allow for a balanced community, while responding to housing need identified within the LHMA or by the Local Housing Authority'

5.7. Such tests could be added as a clarification point for Test C within the actual policy wording, perhaps as a separate paragraph after Test E.

6. QUESTION 10 - Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Policy HA1 – Land to the East of Abergavenny

6.1. Candleston Homes have serious concerns around the assumed delivery rate of the Land to the East of Abergavenny site and suggest that, if it were to be allocated as part of the RLDP, it would not deliver the number of homes that the RLDP envisages that it would.

6.2. This is something that Candleston Homes feel very well-placed to comment upon. There are two reasons for this. Firstly, Candleston Homes has experience, and a track record, of delivering homes across Monmouthshire including The Grove in Llanfoist, Coed Glas in Abergavenny, and are onsite and delivering homes at Elderwood Park in Caldicot. These sites range in size from 50 to 269 homes. Secondly, as the private housebuilding arm of the Melin Group, Candleston Homes is probably the most comparable developer to Monmouthshire Housing Association who is obviously promoting the 'Land to the East of Abergavenny' strategic site.

6.3. This is a point that Candleston Homes has made throughout the preparation of the RLDP, providing comments at Preferred Strategy stage, writing directly to MCC, and making the same points at the Housing Stakeholder Group meeting on 5th September 2024 (as reported in Appendix 2 of the Housing Background Paper).

6.4. There are two reasons for this. Firstly, it will take longer to begin delivering homes than the Housing Trajectory suggests and, secondly, delivery rates will not be as high as the Housing Trajectory anticipates once delivery of homes does commence.

6.5. This can be evidenced both from experience of the adopted Local Development Plan (ALDP) (which is included as Appendix C) and the headlines from the 'Start to Finish 3: How Quickly do Large-Scale Housing Sites Deliver?' paper prepared by Lichfields (which is included as Appendix D) but also Candleston's own experience of delivering sites in Monmouthshire helps to further underpin this.

6.6. Each of these drivers is set out below:

Timescales for Delivery

6.7. The Housing Trajectory assumes that the Land to the East of Abergavenny site will begin delivering homes from 2028/2029. This is based on a situation where the pre-application phase takes place for sixth months, a planning application takes 12 months to determine, and then there is a sixth month period between the grant of planning permission and the commencement of development onsite.

6.8. The ALDP Housing Delivery Table at Appendix C provides the average length of time that it took between the submission of a first planning application and completion of the first house onsite across the seven strategic sites within the ALDP. This shows an average period of time from the submission of the first application to first completion of a property of four years, with a range between two and six years though little relationship of these timescales and the size of a site.

6.9. This broadly aligns with the Lichfields paper which suggests that for sites between 500 and 999 homes, it takes on average 4.9 years from the validation of a first planning application through to first completion on site. This breaks down into 3.4 years for the consideration of all necessary planning applications and 1.5 years between then and first completion. Interestingly, the timescales for both securing approval and planning to delivery period are longer for sites between 100 and 499 homes then between 500 and 999 homes. This aligns with Candleston homes' experience where it took approximately four years from the submission of a planning application to first completion onsite at both The Grove in Llanfoist and Elderwood Park in Caldicot.

6.10. In the case of the Land East of Abergavenny site, there are also significant infrastructure requirements as identified in the Infrastructure Delivery Plan included as Appendix 8 of the Deposit RLDP that suggest that the six-month period from the grant of planning permission and the commencement of development onsite is unrealistic. The Infrastructure Delivery Plan recognises that this includes active travel linkages whilst there are a number of infrastructure elements identified as 'TBC' that, in reality, are likely to need to be delivered before first completion such as the linkages across the A465, off-site highways infrastructure, and the creation of a suitable access from the A465.

6.11. Based on the above analysis, Candleston Homes' view is that first completion will not be in 2028/2029 and that, if a planning application was submitted immediately following adoption of the RLDP in May 2026, first completion is far more likely to be in the 2030/2031 period.

Assumed Delivery Rates

6.12. The other factor that influences how many homes a site is likely to deliver over the RLDP plan period is the rate of delivery after first completion which inherently determines how long it takes for a site to be built-out.

6.13. The Housing Trajectory suggests that the Land to the East of Abergavenny site will be delivered at a rate of 70 homes per year in the first year, 90 homes per year for the next five years, and then 70 homes in the final nine months of the RLDP.

6.14. The ALDP Housing Delivery Table at Appendix C provides an overview of the delivery rates achieved for the ALDP strategic sites. It's probably of limited utility given that the size of the strategic sites allocated in the ALDP are so much lower than the Land to the East of Caldicot/North of Portskewett site, but the table points to an average delivery rate of 51.5 homes per annum across all sites and all years of delivery. The Lichfields Paper is helpful in that it provides a mean and median delivery rate for sites at this scale. It found that sites between 500 and 999 homes were delivered at a mean rate of 70 homes per annum and a median rate of 73 homes per annum.

6.15. From the above, it seems that a delivery rate of 90 homes per annum is unlikely to be achieved and that a delivery rate of circa 70 homes per annum is more realistic.

Conclusion

6.16. Taking the above together, Candleston Homes suggest that the Land to the East of Abergavenny site will not be delivered at the rate that the Housing Trajectory suggests, both due to an underestimation of the time required for first completion but also an overestimation of assumed delivery rates after first completion.

6.17. On that basis, and as shown in the table below, it is suggested that the Land to the East of Abergavenny site should be assumed to have capacity to deliver 350 homes over the RLDP plan period rather than 500 as the Housing Trajectory suggests at present.

Year	Stakeholder Group Housing Trajectory	Candleston Homes Suggested Housing Trajectory
2028/2029	70	0
2029/2030	90	70
2030/2031	90	70
2031/2032	90	70
2032/2033	90	70
2033 (Remainder)	70	50
Total in RLDP Plan Period	**500**	**330**

Policy HA5 – Land at Penlanlas Farm, Abergavenny

6.18. Candleston Homes' Land off Old Hereford Road site is not proposed to be allocated with the Candidate Site Assessment Report (2024) providing the following reason:

> *'The site is not allocated as there is sufficient and more suitable land available for residential development within Abergavenny to accommodate its housing need.'*

6.19. Instead, the only other site other than Land to the East of Abergavenny that the Deposit RLDP proposed to allocate in Abergavenny is for 100 homes under Policy HA5 (Land at Penlanlas Farm).

6.20. Included as part of the evidence base is the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan: Technical Annex Candidate Sites Assessment (September 2024)

prepared by AECOM. This document effectively considered the performance of various candidate sites against a series of criteria relating to their sustainability and how effected they are by various constraints. The table below provides a comparison of Candleston Homes Land off Old Hereford Road site which is not proposed to be allocated and the Land at Penlanlas Farm site which is to be allocated.

	Land at Penlanlas Farm	Land off Old Hereford Road
++	4	3
+	7	9
0	2	1
?	2	2
-	2	2
--	1	1

6.21. Of the four criteria where Land at Penlanlas Farm scores '++', Land off Old Hereford Road also scores '++' for three criteria. The sole point where the Land at Penlanlas Farm site scores '++' and Land off Old Hereford Road only scores '+' is in connection to the following objective:

> *'To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.'*

6.22. For this objective, sites score '++' where they are in excess of 100 homes and '+' when they provide fewer than 50 homes.

6.23. This is important as it effectively indicates that MCC is proposing to take the unsound approach of allocating a less well performing site (Land at Penlanlas Farm) than one that performs better than it (Land off Old Hereford Road), purely because it is bigger. It also means that the sole reason that the Land off Old Hereford Road site was not proposed to be allocated is empirically incorrect.

6.24. Candleston Homes suggest that this is the incorrect approach and that, for the RLDP to be sound, it must allocate sites in order of their performance and that Land off Old Hereford Road should be allocated first with any residual requirement beyond this mase up on all or part of the Land at Penlanlas Farm site.

Appendix A

Monmouthshire County Council
Replacement Local Development Plan (2018-2033)
Preferred Strategy
Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **5th December 2022 to 30th January 2023.** All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

PART 1: Contact details

Your/ your Client's details		Agent's details* *(if relevant)*
Title:		[redacted]
Name:		[redacted]
Job title: *(where relevant)*		[redacted]
Organisation: *(where relevant)*	Candleston Homes	Savills UK Ltd
Address:	c/o agent	[redacted]
Telephone no:	c/o agent	[redacted]
Email: *(if you have one)*	c/o agent	[redacted]

*Note if agent's details are included, all correspondence will be sent to the agent.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: http://www.monmouthshire.gov.uk/planning-policy/current-consultations

Office Use Only
Representor Number ……
Submission Type (email/web/letter etc) ……

PART 2: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help us to understand the issues you raise.

Key Issues, Vision and Objectives (Paras 3.1 - 4.3 / Pages 10- 24)

Do you have any comments on the key Issues, Vision and Objectives?

Candleston Homes have no specific comments to make on the Issues, Vision and Objectives – reflecting their purpose, they are inevitably fairly generic and uncontentious in nature. That said, there is perhaps an opportunity in the Vision for specific reference to be made to ensuring that sufficient housing is delivered to meet both forecast requirements and to address the existing shortfall.

Candleston Homes welcome that the Issues, Vision, and Objectives recognise that there is a limited supply of previously developed land (Paragraph 3.6), that all main towns are outside of the Future Wales Green Belt (Paragraph 3.9), and that it is not possible to avoid allocating land in the primary settlements that is best and most versatile land (Paragraph 3.7).

Preferred Strategy (Paras 4.4- 4.8 / Pages 25-27)

Do you have any comments on the Preferred Strategy?

Specific comments are made with regards to the level and distribution of growth in subsequent questions within this representation in response to questions relating to Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy).

Strategic Policies S1 – Growth Strategy (Paras 4.9- 4.26 / Pages 27-32)

Do you have any comments on Strategic Policy S1 – Growth Strategy

Strategic Policy S1 (Growth Strategy) of the Preferred Strategy sets out the housing and job / employment land requirement over the Replacement Local Development Plan (RLDP) plan period and inherently underpins other policies that will be contained within the RLDP. A requirement for 5,400 homes over the RLDP period is identified with a 10% buffer proposed to be applied on top of this meaning that the delivery of 5,940 homes is to be planned for. This is Growth Option 2 as presented in the Growth and Spatial Options Paper (September 2022).

This is a drastic divergence in approach to the June 2021 version of the Preferred Strategy which identified a requirement for 7,605 homes over the RLDP plan period and made provision for the delivery of 8,366 homes.

Candleston Homes supported the approach taken in the June 2021 Preferred Strategy and continue to believe that it is the correct strategy to be taken for the RLDP. As a whole, the Growth and Spatial Options Paper (September 2022) identifies it as the best performing of the three Growth Options against the RLDP's objectives. The table below compares how Growth Option 1 performs against the other Growth Options set out in the Paper:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

Where Growth Option 1 does achieve "Amber" scores, the Paper notes that "the nature and significance of effects will be dependent on where growth is located and how development is designed / implemented". In other words, the impacts associated with the selection of Growth Option 1 can be mitigated through thorough ensuring the

correct sites are allocated and that the sites incorporate inherent mitigation.

On the basis of the above, Candleston Homes would wholeheartedly support an approach that uses Growth Option 1.

It is understood that Welsh Government objected to the growth option that was selected for the June 2021 Preferred Strategy and that this has driven the selection of Growth Option 2 which performs less well against the RLDP's objectives than Growth Option 1. If Growth Option 2 is to be used for the RLDP, Candleston Homes have three comments on the various components that underpin it.

Migration

The same assumptions are made with regards to UK based migration in the December 2022 Preferred Strategy as in the June 2021 Preferred Strategy. This assumes immigration rates from Bristol and South Gloucestershire based on the average over the last five years (2014/15-2019/20)and from neighbouring planning authorities over the previous 19 years (2001/02-2019/20).

Paragraph 2.15 of the Edge Analytics Updating the RLDP Demographic Evidence (November 2021) paper provides a useful comparison of how the Average Net Household Inflow Per Annum differs over the last 19 years to the last two years as replicated in the table below:

Location of Origin	Average Net Household Inflow Per Annum	
	2001/02–2019/20	2018/19-2019/20
North Somerset	15	30
Forest of Dean	27	57
Bristol	65	148
South Gloucestershire	92	177
Total	199	412

Two things are evident from this table.

- The level of net inflow per annum is greater in recent years than longer terms trends. Whilst the PG Long Term Adjustment of 5 years for Bristol and South Gloucestershire will pick up on some of this recent increase, it will also include the preceding three years where net inflows from these authorities were likely to be lower (although the Edge Analytics "Updating the RLDP Demographic Evidence" paper does not provide this information); and

- Whilst Bristol and South Gloucestershire are the two authorities where the level of immigration is greatest, there have been substantial increases in inflow from other authorities close to the border with Monmouthshire (most notable are the Forest of Dean and North Somerset). These levels are considerably higher in the last two years compared to the previous 19 year.

Candleston Homes support the use of a scenario that makes adjustments for changes to migration but suggest that, rather than a PG Long Term Adjustment of 5 years (i.e. the projected level of inflow should be derived from rates over the previous five years), a PG Long Term Adjustment of 2 years (i.e. the projected level of inflow should be derived from rates over the previous two years) should be used instead and that this should be applied to all authorities rather than just Bristol and South Gloucestershire.

2018- Based Household Projections

Growth Option 2 proposes to use the "Principal Variation" of the 2018-based household projections. Whilst 2021-based household projections are likely to be published prior to the adoption of the RLDP, these are not presently available and the selection of the 2018-based projections at this stage is therefore appropriate albeit it is suggested that this is reviewed when the 2021-based projections are published.

The challenge is that the Principal Variation of the 2018-based household projections have already failed to provide an accurate forecast of the number of households within Monmouthshire. The table below compares the various 2018-based household projections with the 2021 Census.

Method	Households in Monmouthshire as of 2021
Principal 2018-Based Household Projection	40,755 (Forecast)
Higher Variant 2018-Based Household Projection	40,797 (Forecast)
2021 Census	40,900 (Actual)

From the above table, it is evident that the actual number of households within Monmouthshire (as per the 2021 Census) is considerably greater than both the Principal 2018-Based Household Projection and the Higher Variant 2018-Based Household Projection. The effect is that, even after just three years from the base date, the projections have under-projected the number of household by between 145 and 103 homes.

On that basis, it is suggested by Candleston Homes that it would be inappropriate to make use of the Principal 2018-Based Household Projection as a starting point for calculating the RLDP's housing requirement and instead the Higher Variant must be used

Application of Flexibility Allowance

The Preferred Strategy proposed the application of a 10% buffer on top of the housing requirement – in essence 540 homes on top of the 5,400 home requirement so that the RLDP makes provision for 5,940 homes.

Footnote 23 of Paragraph 4.6 of the Preferred Strategy states that:

> *"In accordance with the Development Plans Manual (WG, March 2020) an allowance is provisionally made for a 10% flexibility allowance to factor in sites that may not come forward, unforeseen issues or to meet higher aspirations for the County to enable the provision/delivery of additional sites if all sites are delivered. The flexibility allowance will be given further consideration and refined at Deposit stage"*

This is an incorrect reading of the Development Plans Manual which, at Paragraph 5.59 states that:

> *"The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced."*

The 2022 Annual Monitoring Report, in its consideration of the adopted LDP performance at delivering Strategic Policy S2 (Housing Provision), states that:

> *"Ten years' worth of completions were recorded during the 2020-21 monitoring period, with the Plan delivering a shortfall of -1,500 units (33.3%) at that point when compared to the 10-year Plan requirement of 4,500 units."*

Despite the adopted LDP applying a 10% flexibility allowance in excess of the housing requirement, the latest Annual Monitoring Report, which now covers the entire adopted LDP plan period, demonstrates a substantial shortfall in housing delivery against requirement.

On this basis, there is a clear justification that is robustly evidenced for the incorporation of a higher flexibility

allowance that is considerably higher than the 10% figure that is suggested as a starting point in the Development Plans Manual as a starting point and it is therefore suggested that there is a robust justification for the incorporation of a 25% flexibility allowance on top of housing requirement.

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.27 - 4.35 / Pages 33 - 40)

Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?

Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) effectively does four things:

1) Sets out a settlement hierarchy for the distribution of housing to be delivered across the RLDP period;

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period; and

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Comments are made on point in turn below:

1) Sets out a spatial hierarchy for the distribution of housing to be delivered across the RLDP period;

Abergavenny is identified in Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) of the Preferred Strategy as one of four Primary Settlements alongside Caldicot, Chepstow, and Monmouth at the top tier of the settlement hierarchy.

This is not surprising and is the correct thing to do – the approach reflects the findings of the Sustainable Settlement Appraisal (December 2022) and mirrors the approach taken in the adopted LDP and in the June 2021 Preferred Strategy.

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period;

Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) of the Preferred Strategy indicates that 24% of the housing requirement identified in Strategic Policy S1 (Growth Strategy) is to be delivered in the Abergavenny. This equates to 1,403 homes. Candleston Homes support a strategy which directs such a proportion of new housing to Abergavenny and believe that such an approach is justified based on the Sustainable Settlement Appraisal (December 2022) and the historic rates of delivery within the settlement.

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Included in the section relating to Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) is Table 2 which provides a summary of the various components for each settlement that will deliver the requirement set out in Strategic Policy S1 (Growth Strategy). Whilst clearly the "Completions 2018-2021" component is a fixed position that reflects previously completed, Candleston Homes have comments on other components of Table 2.

Existing Commitments

Table 2 identifies that a total of 1,261 homes are to be delivered through Existing Commitments, these being sites which are under construction or sites where there is either a planning permission in place or sites where there is a

resolution to grant planning permission subject to the signing of a Section 106 agreement. From this list, the Housing Background Paper (December 2022) removes three sites which officers do not expect to come forward.

The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Candleston Homes. There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed. The approach taken in the Strategic Options Paper (November 2021) prepared by Cardiff Council applied a 20% discount on Existing Commitments and it is considered that such a discount should be applied as a minimum.

On this basis, it is suggested that the "Existing Commitments" component should be reduced by 20% from 1,261 to 1,009.

Total Allowances (Small Sites; Windfalls)

The "Total Allowances" is broken down further in the Housing Background Paper (December 2022) into "Windfall Sites" and an "Allowance for Small Sites".

With regards to the calculation of "Windfall Sites", Candleston Homes welcome that an assumption has not been made on the basis of previous average delivery rates given that this will have been distorted by permissions under the unallocated sites policy. The preparation of the Housing Potential Study as detailed in Appendix 3 of the Housing Background Paper (December 2022) is a sensible method for forecasting delivery on windfall sites. That said, there can be no certainty that all 14 identified sites will be delivered or that they will deliver the number of homes that they are expected to in the Housing Potential Study, particularly given that only four are under the ownership of MCC. Given the lack of certainty with regards to the delivery of these sites, it is suggested that a substantial discount, perhaps of as much as 50% should be applied.

The calculation for the "Allowance for Small Sites" is based on the average delivery of such sites over the previous 10 years, adjusted to remove any sites delivered in the Upper River Wye Catchment Area (because they could not be delivered due to the phosphate issue) and to include a 20% discount in Rural Areas. There are two points to be made here:

- Whilst acknowledging that the delivery of Small Sites in rural areas will be more challenging in the RLDP (hence the 20% reduction), it is not clear why such a reduction is not applied to other tiers of the settlement hierarchy where, much like the Rural Areas, the number of units that will be delivered will likely be less as the easier opportunities have been delivered. In many ways, Table 7 of the Housing Background Paper (December 2022) already shows this with the level of small site completions being 45 compared against a ten year average of 82. It is suggested that such a discount need to be applied to the allowance for all tiers of the hierarchy; and

- No allowance is made for the demolition of existing homes which will inevitably be required to deliver windfall sites as, for example, a single property is demolished to provide the land required for a greater number of homes. Such an approach has been taken by Cardiff Council which had been calculating demolitions over the LDP period (which it is understood that MCCC may not have done) and this equated to 10% of units to be delivered via windfall. It is therefore suggested that a discount of 10% is applied for the

loss of existing housing stock.

Candleston Homes therefore suggest that Table 2 needs to be amended so that 609 homes are assumed to be delivered as Total Allowances (Small Sites; Windfalls) – 105 on Windfall Sites and 504 as an Allowance for Small Sites.

Allocations

Taking the above together, even if no change is made to the housing requirement set out in Strategic Policy S1 (Growth Strategy), the above analysis suggests that there is a requirement for an additional 543 homes to be allocated than forecast in Table 2.

If the settlement hierarchy and distribution set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) is continued, this suggests that the figure set out in Table 2 for the quantum of homes to be delivered through new allocations in Abergavenny should be increase proportionately from 600 to 730 homes.

Strategic Policy S7 – Preferred Strategic Site Allocations
(Please State which Preferred Strategic Site Allocation you are commenting on)
(Paras 5.32 - 5.36 / Pages 56- 59)

Do you have any comments on the Preferred Strategic Site Allocations?

Strategic Policy S7 (Preferred Strategic Site Allocations) – Abergavenny East (CS0213)

The Preferred Strategy identifies the "Abergavenny East" site as a Preferred Strategic Site Allocation with capacity to deliver 635 homes of which 500 will be within the RLDP plan period.

Included at Appendix 1 is a paper entitled "Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites?" prepared by Lichfields which examines the timescales associated with the delivery of large strategic housing sites. For sites between 500 and 1,000 homes the paper found that it typically takes 5.0 years from the submission of the first planning application to the first completion of a home. This is split into 3.3 years to secure planning permission and a further 1.7 years from securing planning permission to starting on site. Following first completion, sites of between 1,000 and 1,500 homes were found to deliver homes at a rate of 68 homes per year.

If the timescales set in the Delivery Agreement are kept to, and an application submitted when the RLDP reaches Deposit stage in Q1 2024, this would mean that the first completion would not be until 2029. On the basis of the above average annual delivery rate, this would suggest that the Abergavenny East site is likely to only deliver for four years of the RLDP period and will deliver a total of just 272 homes. This should be seen as a minimum for the following reasons:

- Presumably a new roundabout will need to be constructed to facilitate the securing of vehicular access from the A465;

- The site is being promoted by a local housing association which, from a planning history search, over the last 10 years has not delivered a scheme any greater than 57 homes; and

- Whilst submitted as a single Candidate Site, CS0213 is under the series of separate land ownerships, comprising predominantly of numerous private individuals.

Other Strategic Policies (Please State which Strategic Policy you are commenting on)
(Paras 5.1-5.123 / Pages 41-98)

Do you have any comments on the Strategic policies?

Strategic Policy S6 (Affordable Housing)

Candleston Homes have provided comments in connection to Strategic Policy S1 (Growth Strategy) suggesting that the housing requirement for the RLDP should be higher than currently planned for in the Preferred Strategy. This in turn would result in an increase in the affordable homes target.

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on) (Appendix 7 Pages 136-147

Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

Any other Comments

Do you have any other comments on the Preferred Strategy?

Welsh Language

We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Initial Integrated Sustainability Appraisal (separate document)

Do you have any comments on the Initial Integrated Sustainability Appraisal Report?

Habitats Regulations Assessment (separate document)

Do you have any comments on the Habitats Regulations Assessment?

To assist with the efficient processing of responses we would encourage you to submit your comments via email to: planningpolicy@monmouthshire.gov.uk. If this is not possible completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 30th January 2023**.

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is

available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. ☐

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. ☐

Appendix B

COM5: Affordable Housing Exception Sites

Proposals to develop affordable housing on sites within or adjoining settlement boundaries will only be permitted where:

1) The proposal meets an identified local need that cannot be satisfied on alternative sites within the locality's identified settlement boundary;
2) The proposal represents a logical extension to the existing settlement, does not exceed ten affordable dwellings and is of a scale appropriate to and in keeping with the character of the settlement;
3) The site is in a sustainable location, within or adjoining an existing settlement boundary with reasonable access to at least a basic range of local community services and facilities;
4) The proposed dwelling(s) are of a size, tenure and design which is commensurate with the affordable housing need identified for the locality;
5) There are secure mechanisms in place to ensure the dwellings are accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers; and
6) There is no loss of land of important recreational, amenity or natural heritage value.

Proposals within or adjoining Tier 1 and Tier 2 Settlements that exceed the threshold of ten dwellings in criterion 2 will be permitted where the applicant can demonstrate:

a) There are no existing concentrations of affordable housing within the site's vicinity, which would be further compounded by the proposal;
b) The design, scale, layout and siting of the affordable homes will positively integrate with nearby existing communities to ensure the development will not result in a noticeable, isolated concentration of affordable housing; and
c) The proposal contains a sustainable mix of house types, sizes and tenures to allow for a balanced community, while responding to housing need identified within the LHMA or by the Local Housing Authority.

All exception sites must provide enhanced active travel links to connect to the Active Travel Network and/or nearest commercial centre as appropriate.

Market housing will not be permitted on 100% affordable housing exception sites. The proposed affordable housing must meet the needs of local people in perpetuity, which will be secured through the planning consent by means of a S106 legal agreement.

5.3.34 The LDP Strategy directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking in accordance with the Settlement Hierarchy. Development of land within or on the periphery of urban areas is therefore prioritised, especially on previously developed 'brownfield' sites. The Replacement LDP has also made provision to deliver the affordable housing target specified within COM2 within the designated settlement boundaries. However, it is acknowledged that there may be some instances where it is not always possible to meet locally identified need for affordable housing within existing settlements. Whilst the Council expects the majority of development to take place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise permit new housing outside settlement

Appendix C

Strategic Site	Number of Homes Site Allocated For	Outline Application Reference Number	Outline Application Submission Date	Outline Application Approval Date	Reserved Matters Application Reference	First Reserved Matters Submission Date	Reserved Matters Approval Date	Years between Submission of First Planning Application and Completion of Home
Deri Farm, Abergavenny	250	DC/2014/01360	11/11/2014	19/01/2018				4
Crick Road, Portskewett	285	DM/2018/00696	27/04/2018	30/03/2019	DM/2019/01629	04/10/2019	26/02/2020	6
Fairfield Mabey, Chepstow	350	DC/2014/01290	27/10/2014	27/11/2017	DM/2019/00001	21/01/2018	17/06/2019	6
Wonastow Road, Monmouth	450	DC/2013/00368	02/05/2013	19/12/2014	DC/2015/00392	30/03/2015	17/11/2015	3
Rockfield Farm, Undy	270	DC/2016/00883	27/07/2016	20/03/2018	DM/2018/01606	03/10/2018	22/02/2019	3
Vinegar Hill, Undy	225	DM/2019/01937	04/12/2019	16/06/2022	DM/2022/01042	14/07/2024	05/04/2023	4
Sudbrook Paper Mill, Sudbrook	190	DC/2015/01184	29/09/2015	11/11/2016				2

Strategic Site	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	Total	Average Annual Delivery Rate
Deri Farm, Abergavenny	0	0	32	68	83	51	0	0	234	58.5
Crick Road, Portskewett	0	0	0	0	0	0	0	14	14	14
Fairfield Mabey, Chepstow	0	0	0	0	18	88	97	114	317	79.25
Wonastow Road, Monmouth	21	66	166	74	13	0	0	0	340	68
Rockfield Farm, Undy	0	0	0	16	41	49	38	0	144	36
Vinegar Hill, Undy	0	0	0	0	0	0	0	23	23	23
Sudbrook Paper Mill, Sudbrook	0	2	33	61	28	41	0	0	165	41.25

Appendix D

INSIGHT
MARCH 2024

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION



LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk



Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). As we approach a general election, and with no end to the housing crisis, the boosting of housing delivery to achieve 300,000 homes per annum through a new generation of Local Plans (prepared under the Levelling Up and Regeneration Act) faces renewed focus. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites, which – with our enlarged sample – now considers real-world implementation across 179 sites of over 500 dwellings.

We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.
2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and increased mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a price consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 - 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.

Key figures

297 sites assessed, with a combined yield of 387k+ dwellings; 179 of the sites delivering 500+ dwellings

9 solely apartment schemes in urban areas assessed, with a combined yield of 5,300+ units

6.7 median years from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings

100-188 dpa average annual build-out rate range for schemes of 2,000+ dwellings[1]

44-83 dpa average annual build-out rate range for scheme of 500-999 dwellings[2]

34% quicker[3] to deliver greenfield sites of 500 or more units than their brownfield counterparts

69 dpa average completion per outlet on sites with one outlet, dropping to 62 dpa for two outlets, and 55 dpa for three outlets

3x longer planning to delivery periods for brownfield apartment schemes of 500-999 units compared to their conventional housing counterparts

[1] Range is from the lower quartile to upper quartile figures

[2] As above

[3] This is based on the median metric

01
Introduction

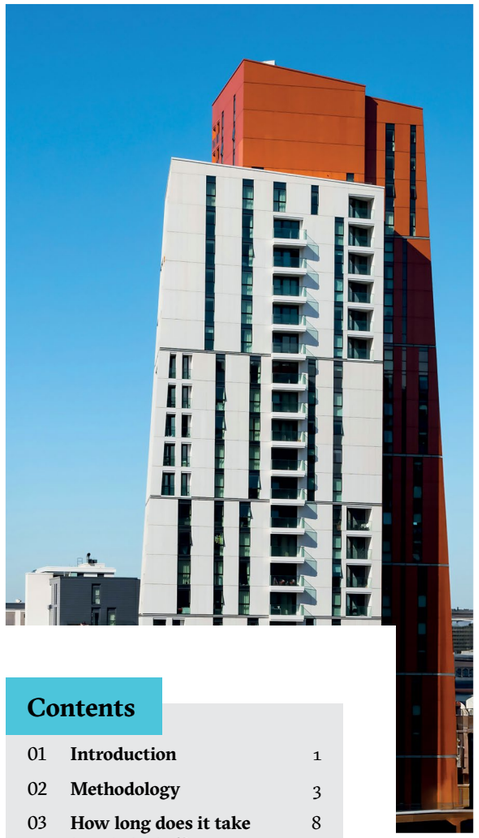
This is the third edition of Lichfields' award winning[4] research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data[5] where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform[6] including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out[7]. As of 2024, the business models of housebuilders and land promoters - and allegations of perceived 'land banking' – have received fresh examination by the Competition and Markets Authority (CMA) which published its Market Study in February 2024[8]. The CMA found that land banking is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



© Benjamin Cheng via Unsplash

Contents

01	Introduction	1
02	Methodology	3
03	How long does it take to get started?	8
04	How quickly do sites build out?	12
05	What factors can influence build-out rates?	15
06	Delivery of brownfield, urban apartment schemes	21
07	Conclusions	25

[4] The first edition was the winner of the 2017 RTPI Planning Consultancy Research Award

[5] Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

[6] Leading in due course to the August 2020 Planning White Paper: Planning for the Future

[7] Published October 2018

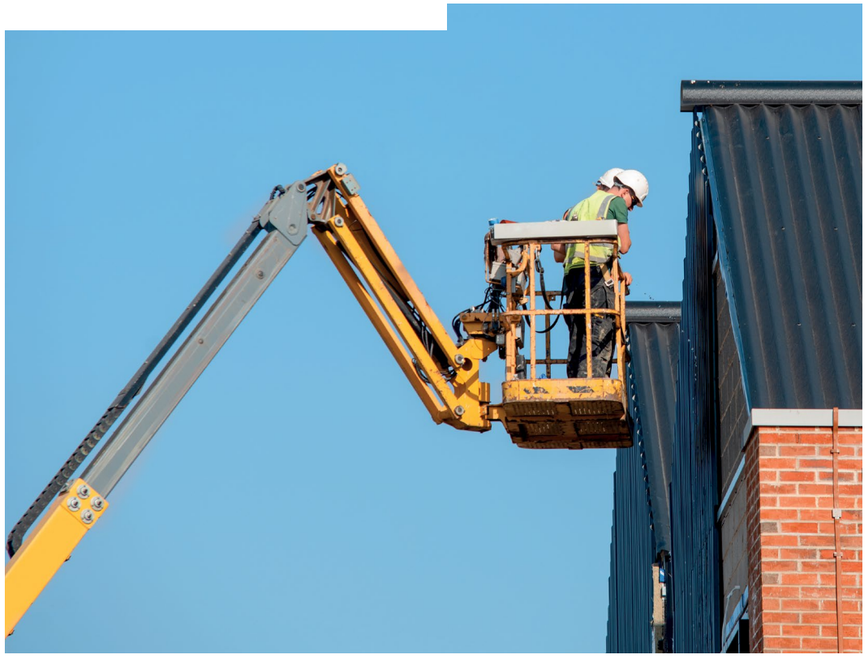
[8] https://assets.publishing.service.gov.uk/media/65d8baed6efa8300ldddcc5cd/Housebuilding_market_study_final_report.pdf

The Levelling Up and Regeneration Act ('LURA')[9] introduced new measures aimed at build-out via the use of Commencement Notices (s111), Progress Reports (s114) and Completion Notices (s112). Regulations to determine the practicalities of these measures are awaited[10] but their design and application will benefit from a sound evidence-based grasp of how strategic housing schemes are implemented.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories. This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. Recent policy shifts – increasing the focus on boosting housing supply on previously-developed sites[11] – mean it will become more important to understand the distinctive delivery profile of such schemes.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



[9] https://www.legislation.gov.uk/ukpga/2023/55/enacted

[10] The provisions require secondary legislation which, at the time of writing, has not been published and for which there is no timetable. There is also no guarantee the provisions will ever come into force. Albeit the provisions for making these regulations will come in to force on 31st March and the intentions were set out at the time the Bill was published in the supporting Further Information paper.

[11] Including the December 2023 changes to the NPPF, which clarify that the 35% uplift to the Standard Method in the 20 largest urban centres is expected to be delivered in those areas rather than in surrounding areas. In February 2024, the Secretary of State published the review into the London Plan and issued a consultation on 'Strengthening planning policy for brownfield development': https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development

INSIGHT
START TO FINISH

02
Methodology

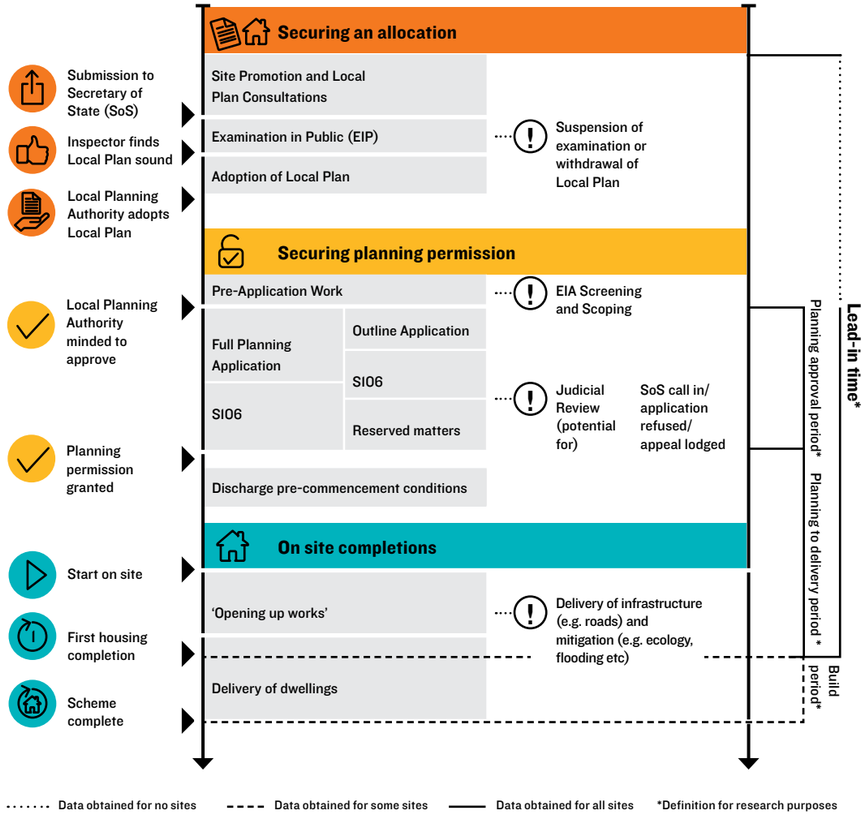
This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

Definitions

For all sites, we look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.I: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.

Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.



Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.

The sources on which we have relied to secure delivery data on all sites in this research include:

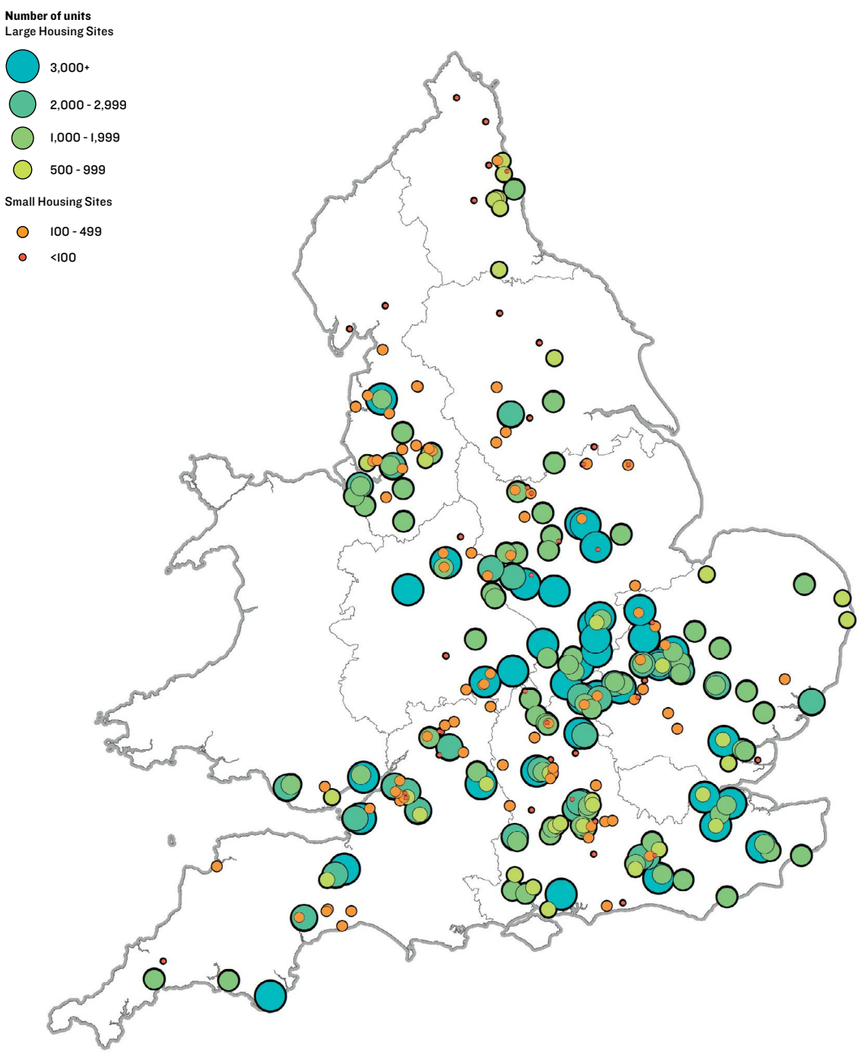
1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs[12];
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.



[12] Monitoring documents, five-year land supply reports, housing trajectories (some in land availably assessments), housing development reports and newsletters

INSIGHT
START TO FINISH

Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

03
How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

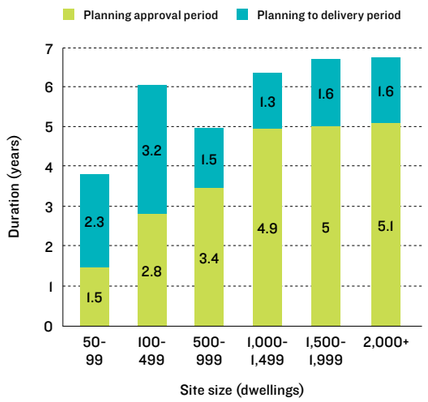
The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/ hybrid application). Our data shows that the average median planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis into the length of time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

Table 3.1 Lower quartile, median and upper quartile planning approval period (years) by site size

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.1
Median	1.5	2.8	3.4	4.9	5.0	5.1
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

The CMA go on to say in footnote 111 that *"in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years"*. This is more closely aligned to our findings on securing planning permission on a large site.

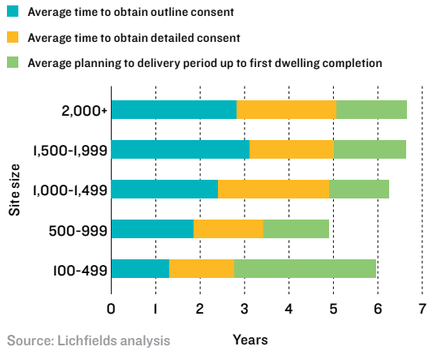
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the NPPF[13] which raised the bar on the definition of 'deliverable' for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the 'clear evidence' required to demonstrate deliverability of sites that do not benefit from a detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 - 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will on average deliver limited amounts of housing within the next five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site[14]. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

[13] February 2019

[14] CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

INSIGHT
START TO FINISH

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 - 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

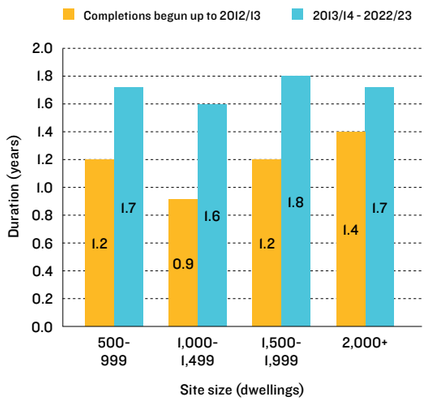
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research[15] provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 – 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF, the planning to delivery period has extended up to 1.6 - 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year period. Interestingly, sites of 100 - 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 - 7 years, despite significant variation in site size.

After this period, an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4).



[15] Lichfields, 2021 Tracking Progress

INSIGHT
START TO FINISH

04
How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries. Whilst the pressure on LPAs to maintain a five (or four[16]) year housing land supply may be decreasing[17], the LURA contains measures that will increase scrutiny of build-out rates at the planning application stage, with the potential (at least in theory) for Completion Notices that nullify permissions when sites fall behind from their agreed delivery pace. A good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520-620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet[18], the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement[19])	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

[16] See NPPF paragraph 226

[17] See NPPF paragraph 76

[18] Ebbsfleet has delivered a series of high annual build-out rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

[19] The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

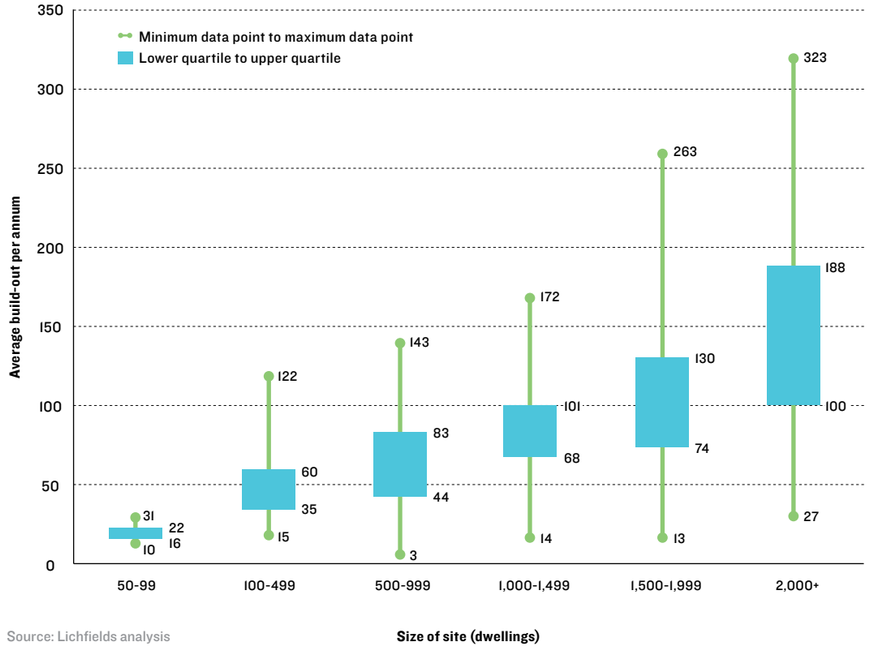
In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

100-188 dpa

average annual build-out rate on 2,000+ dwelling scheme

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

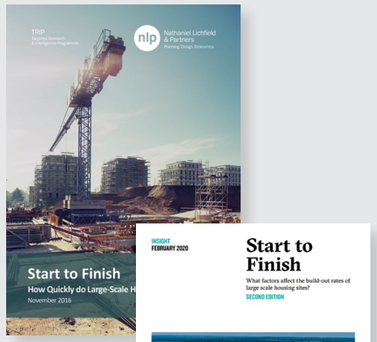


Table 4.2 Average build-out rates by size of site (dwellings) comparred with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

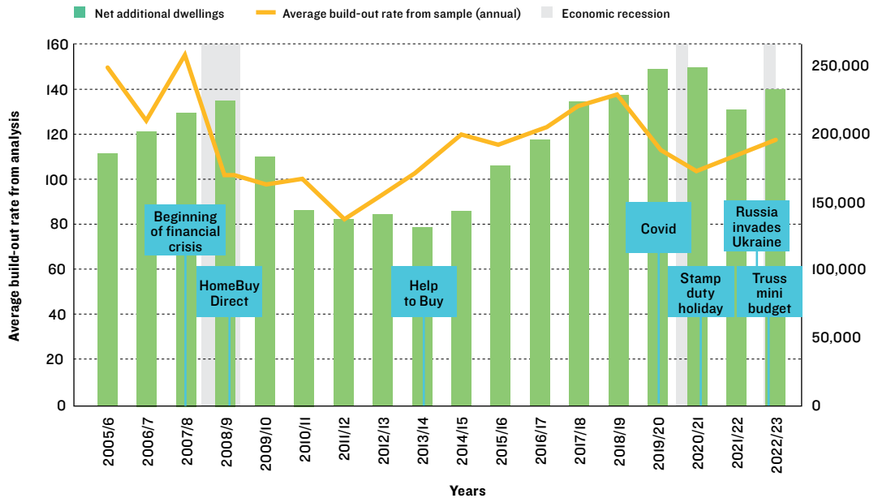
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period[20]. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.I: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table 104

[20] https://www.gov.uk/government/statistics/help-to-buy-equityloan-scheme-data-to-30-september-2021/help-to-buy-equity-loanscheme-data-to-30-september-2021#aboutthe-help-to-buy-equityloan-scheme

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) *"over half the impact from two years of interest rate increases is still to be felt"*. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF 'A New Normal for Housebuilding' forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025[21].

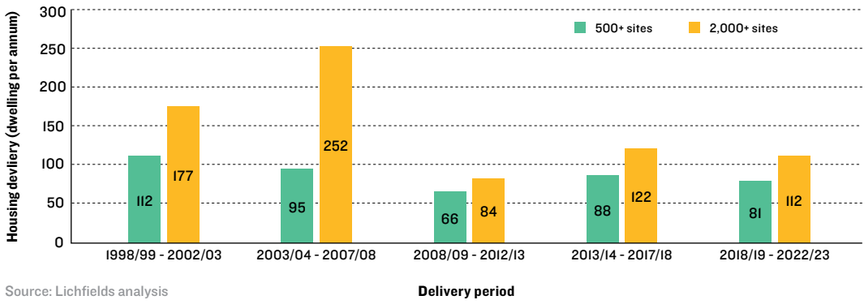
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

[21] https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024

Site specific factors

Do homes get delivered faster in high pressure areas?

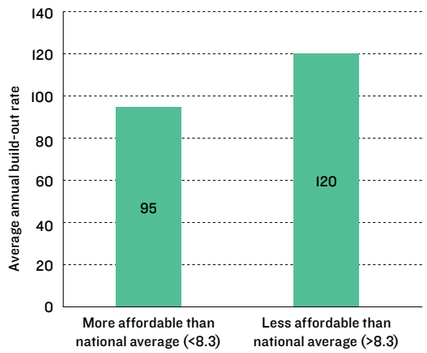
The rate at which homes can be sold (the 'absorption rate') determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government's standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas[22].

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved[23].



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordbaility ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

[22] This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were 'more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were 'less affordable than the national average (>8.72) at 126 dpa

[23] Using ONS long term affordability data https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022#:~:text=In%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings

34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Housing mix and variety

The Letwin Review[24] posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build-out. It concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10- 19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

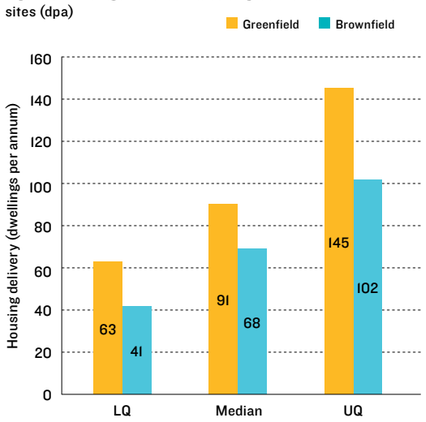
Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

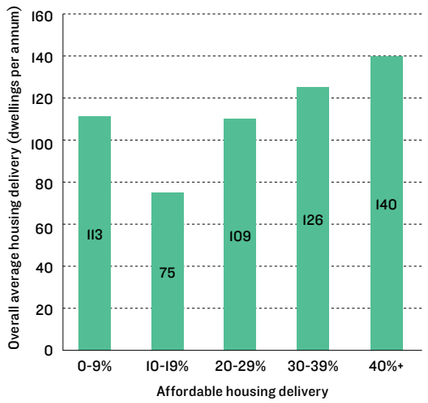
Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



Source: Lichfields analysis

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	**73**	**353**	**409**	**22**	**35**	**178**

Source: Lichfields analysis

[24] https://www.gov.uk/government/publications/independent-review-ofbuild-out-final-report

[25] https://www.gov.uk/government/publications/independent-review-of-build-out-final-report

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis

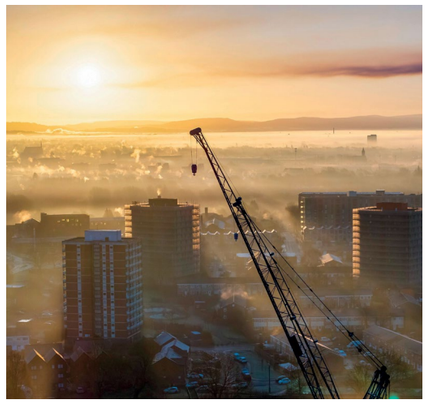
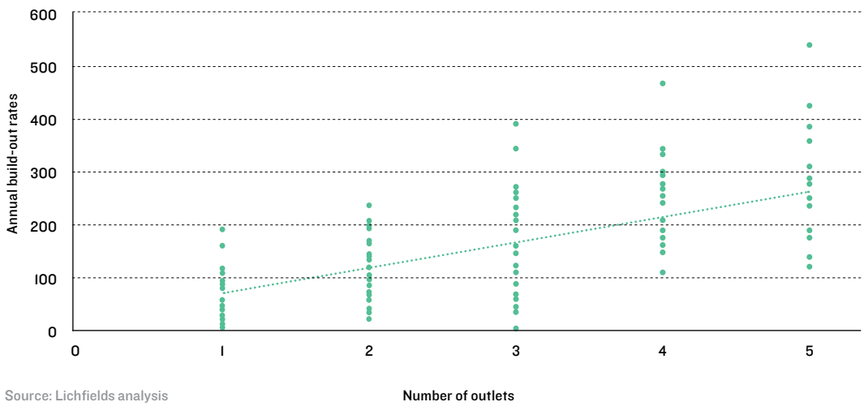


Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

06
Delivery of brownfield, urban apartment schemes

Government policy is seeking to increase the emphasis on brownfield residential development, and higher density, apartment schemes are likely to be a consequence. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

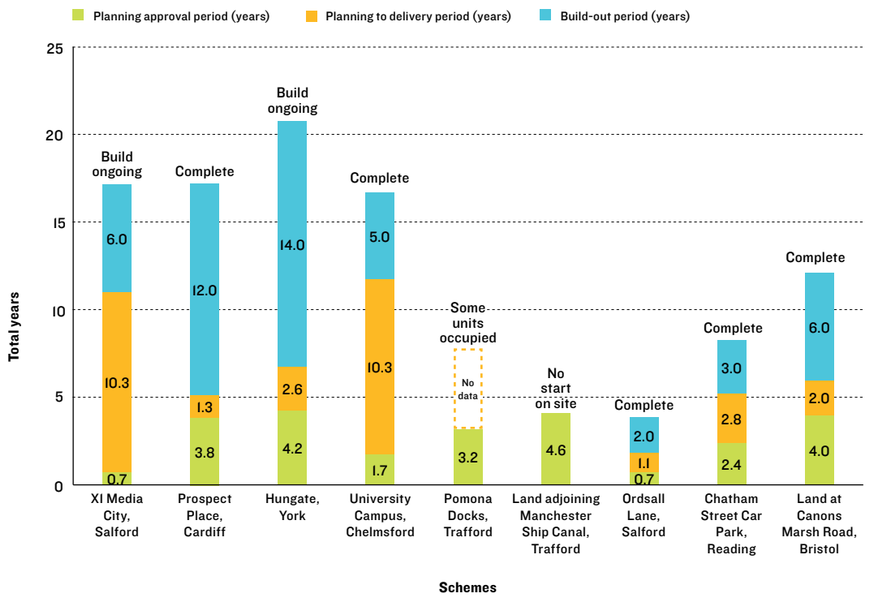
1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
   - **X1 Media City**: This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012. A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.
   - **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	XI Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE		**3.5**	**4.3**		
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE		**2.9**	**2.0**		

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the 'all or nothing' requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

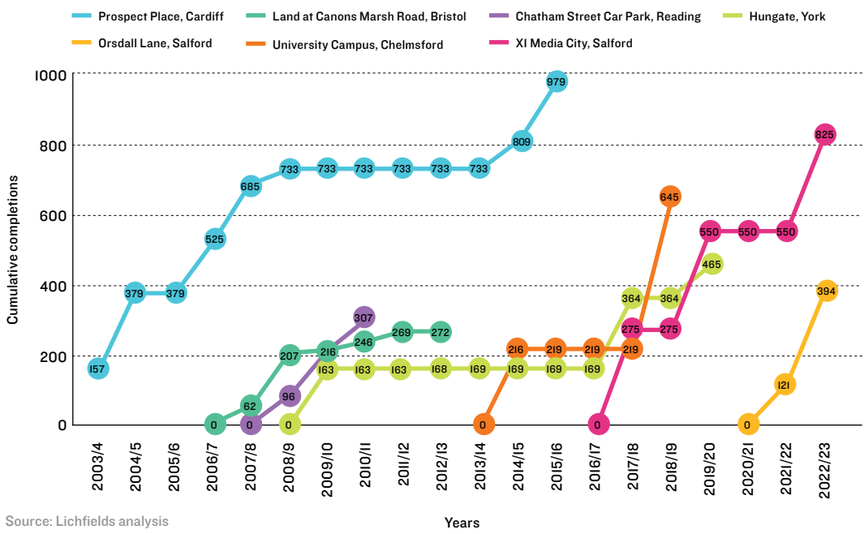
From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes available for sale and occupation. Furthermore, while some significant 'peak' annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
XI Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)



Source: Lichfields analysis

07 Conclusions

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the CMA's work. We present some statistical averages to assist the debate, but the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and it is these – alongside the characteristics of individual sites – that needs to be considered carefully by local authorities relying on these projects to deliver planned housing.

The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build out illustrates the risk of relying on a singular estimate.

Key findings

1. **Only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application**

   When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period from the date that the first application is validated. The lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period.

   The planning to delivery period is circa 1.3 – 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.



2. Average annual build-out rates on large scale sites are lower than previous editions of this research

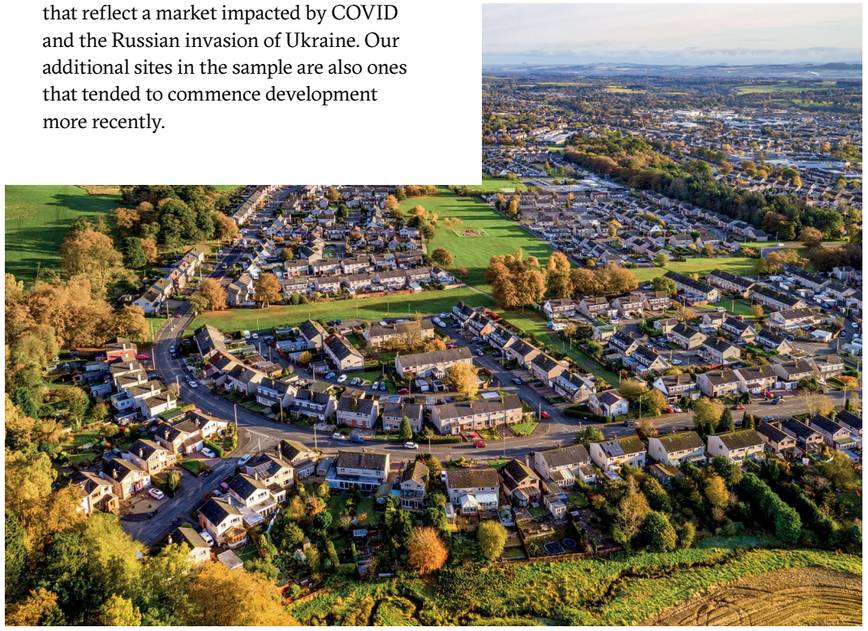
The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 151 dpa. For sites of under 1,000 homes, the median build-out rate is also lower. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.

3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows, a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked, and mortgage affordability will improve in 2025.



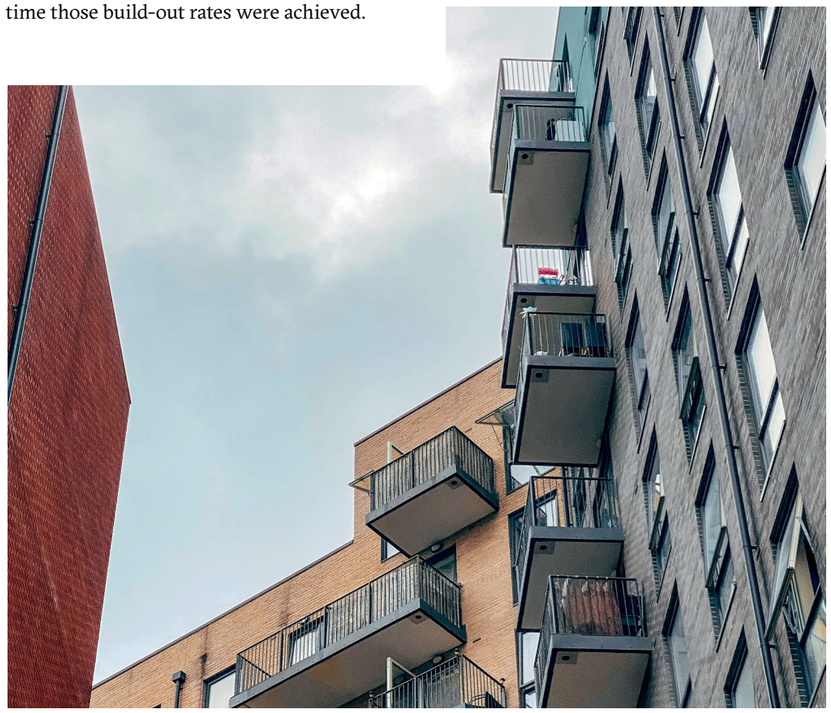
4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.

5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering 10-19% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.



© Super Straho via Unsplash

INSIGHT
START TO FINISH

6. **Large-scale apartment schemes on brownfield land are less predictable forms of supply**

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the GFC.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

"While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year."

The CMA's recommendation on seeking to speed up the pace of new housebuilding should be viewed in the context of this research which, when compared with the first and second editions, shows that reported average build-out rates are slightly lower, albeit only slightly.

As we approach a general election, and with the housing crisis unresolved, the challenge of boosting housing delivery is being discussed with renewed vigour.

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed. Other factors – including funding for affordable housing and to unblock barriers to site delivery – are also needed.

In the current environment, a sufficient pipeline of sites with planning status in each location (itself dependent on a functioning planning system), with a suitably varied range of housing types and tenures, and the forecast recovery of the housing market from its recent downturn are all necessary to secure a recovery in the supply of new homes.

Appendices

Contents

Appendix 1: Definitions and notes
Appendix 2: Large sites table
Appendix 3: Small sites tables
Appendix 4: Solely apartment scheme details

INSIGHT
START TO FINISH

Appendix 1:
Definitions and notes

The ‘lead-in’

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time also includes the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The ‘planning approval period’

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwelling/s on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed ‘consent’ was considered reasonable and proportionate milestone for ‘planning’ in the context of this research. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted ‘planning to delivery period’.

The ‘planning to delivery period’

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the ‘first housing completion’

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The ‘annual build-out rate’

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Appendix 2: **Large sites tables**

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Ebbsfleet	Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312	613	553	347	533	619											
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	239	223	460	299
Houlton (Rugby Radio Station)	Rugby	6,200	2019/20	11	197	210																						
Land at Chilmington Green (South Ashford GC)	Ashford	5,750	2019/20	75	74																							
Sherford	South Hams	5,500	2016/17	7	130	142	151	113	108	183																		
Hanwood Park (East Kettering SUE)	North Northamptonshire	5,500	2016/17	29	124	132	179	103	230																			
North West Preston (MD2)	Preston	5,300	2015/16	57	250	297	411	307	266	372	359																	
Priors Hall	North Northamptonshire	5,200	2011/12	56	21	59	87	170	155	269	238	171	145	112														
Former Alconbury Airfield, Huntingdon	Huntingdonshire	5,000	2021/22	208	208																							
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	29	57	0	0	10													
Monkton Heathfield	Somerset West and Taunton	4,500	2012/13	22	76	220	191	222	145	84	49	89	67															
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47	95	344	177	218	251										
Thorpebury (North East Leicester SUE)	Charnwood	4,500	2021/22	32																								
Whitehouse - Western Expansion Area	Milton Keynes	4,320	2015/16	21	124	270	297	341	151	141	134																	
Valley Park (Land to the west of Great Western Park)	Vale of White Horse	4,254	N/A																									
Broughton Gate & Brooklands (Eastern Expansion Area)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138	144	305	239	242	187	309	254	158											
Glan Llyn (Former Llanwern Steelworks)	Newport	4,000	2011/12	10	35	112	76	127	75	124	154	67	55	190	171													
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86	57	53	153															
Stanton Cross	North Northamptonshire	3,650	2018/19	57	158	132	111																					
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262	200	195	164	211	236																	
Chatham Docks/ Waters	Medway	3,600	2021/22	199	193																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Overstone Leys (Northampton North SUE)	Daventry	3,500	2017/18	21	47	58	68	163	197																			
Northstowe Phase 2	South Cambridgeshire	3,500	2020/21	2	41																							
Long Marston Airfield	Stratford-upon-Avon	3,500	2021/22	77																								
South East Coalville (Land north and south of Grange Road)	North West Leicestershire	3,500	2018/19	4	63	124	272	207																				
Great Western Park	South Oxfordshire	3,364	2011/12	110	204	232	392	368	389	431	471	430	205															
Grantham North West Quadrant (Poplar Farm & Rectory Farm)	South Kesteven	3,350	2013/14	13	102	108	25	74	193	108	43	8																
Cambourne (original new settlement)	South Cambridgeshire	3,300	1999/00	42	180.5	180.5	213	337	620	151	378	268	219	191	161	206	154	151	128	239	201	96	126	87	32	61	93	
Lawley Village	Telford and Wrekin	3,300	2013/14	176	251	211	190	210	367	57	10																	
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	2010/11	22	164	273	321	562	378	350	265	340	191	107	136	158												
Land Around Fernwood	Newark and Sherwood	3,200	2019/20	3	53	87	141																					
Middlebeck (Land South of Newark)	Newark and Sherwood	3,150	2018/19	57	90	117	152	87																				
Oakley Vale	North Northamptonshire	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	127	103	51	40	9	78	68	59	88	87				
Land North of Beaconside/Stafford	Stafford	3,100	2018/19	10	33	30	27	111																				
Burgess Hill Northern Arc	Mid Sussex	3,040	N/A																									
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31	27		
North West Cambridge	Cambridge	3,000	2016/17	73	353	409	22	35	0																			
West of Waterlooville	Havant	3,000	2009/10	38	71	30	82	112	135	196	241	193	194	181	91	109	93											
Lighthorne Heath, Kingston Grange	Stratford-upon-Avon	3,000	2019/20	13	34	219																						
Towcester Vale SUE (JCS Policy T3)	West Northamptonshire	3,000	2017/18	42	192	135	145	174	236																			
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																			
Glebe Farm	Milton Keynes	2,900	2019/20	63	177	422	214																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Wintringham Park, St. Neots	Huntingdonshire	2,800	2020/21	50	81	166																						
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	90	19	0	4	0	0												
Mowbray, North of Horsham	Horsham	2,750	N/A																									
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419	344	361	348	291															
Winterstoke Village, Western-super-Mare	North Somerset	2,550	2014/15	132	185	242	161	178	42	56																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	238	387	424	122	254	262	194	234																
Branston Locks	East Staffordshire	2,500	2018/19	3	33	84	138																					
Great Wilsey Park, Haverhill	West Suffolk	2,500	2022/23	90																								
Kilnwood Vale	Horsham	2,500	2013/14	75	76	131	51	53	196	74	199																	
City Fields	Wakefield	2,500	2017/18	59	92	125	200	298	336																			
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118	71	28	0	54																
East Anton (Land East Icknield Way)	Test Valley	2,484	2009/10	184	257	103	181	135	229	146	184	162	239	279	242													
Kingsbrook (Aylesbury Garden Town)	Buckinghamshire	2,450	2016/17	92	219	181	204	184	235	201																		
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154	232	273	165	296													
Cambourne West	South Cambridgeshire	2,350	2021/22	93																								
The Steadings (Chesterton Strategic Site)	Cotswold	2,350	2022/23	2																								
Broadlands	Bridgend	2,309	1999/00	288	331	307	193	204	156	64	104	91	28	81	50	147	11											
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45	52	52	0	0														
Arborfield Garrison	Wokingham	2,225	2016/17	57	114	116	268	348	336																			
Fairfields (Western Expansion Area)	Milton Keynes	2,220	2015/16	114	165	267	288	163	105	112	77																	
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168	174	125	167	118	8												
Great Kneighton (Clay Farm)	Cambridge	2,188	2012/13	16	271	393	149	467	539	109	93	99	52															
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30												
Money Hill - Land north of Ashby de la Zouch	North West Leicestershire	2,050	2017/18	42	28	27	24	11	30																			
Land to the north east of Didcot	South Oxfordshire	2,030	N/A																									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90	13	53	121	49																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
North Felixstowe Garden Neighbourhood	East Suffolk	2,000	2021/22	10	65																							
Comeytrowe / Trull	Somerset West and Taunton	2,000	2021/22	4																								
Graven Hill	Cherwell	1,900	2016/17	1	28	122	44	176																				
North East of Didcot	South Oxfordshire	1,880	2019/20	27	82																							
Elvetham Heath (Fleet)	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6																
Colethrop Farm (Hunts Grove)	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22	112	127	209	122													
Great Denham	Bedford	1,750	2009/10	92	150	159	71	122	146	123	211	162	191	63	39	25	9											
Horwich Loco Works	Bolton	1,710	2018/19	3	33	45	30																					
Land at Berry Hill, Mansfield	Mansfield	1,700	2018/19	36	131	172	157	80																				
Tadpole Garden Village	Swindon	1,695	2014/15	27	161	400	215	448	328																			
Plymstock Quarry	Plymouth	1,684	2013/14	2	100	110	57	71	73	73	41	23	56															
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96				
Red Lodge	West Suffolk	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111											
Melton Road, Edwalton	Rushcliffe	1,667	2016/17	40	126	271	144	140																				
Newton Leys	Milton Keynes	1,650	2014/15	223	140	154	88	134	148	103	102	76																
South West Bicester (Phase I Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196	205	110	95															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8	110	76	16	87	0	161													
Chesterwell, North Colchester Urban Extension	Colchester	1,600	2015/16	150	150	150	150	150	56	59	90																	
Harworth Colliery - Simpson Park	Bassetlaw	1,600	2014/15	7	28	45	36	2	62	43	63	42																
Parc Derwen	Bridgend	1,577	2010/11	8	103	134	201	199	197	157	186	157	94	19	51													
Chesterfield Waterside, Brimington Road, Chesterfield	Chesterfield	1,550	2014/15	19	0	0	0	0	0	46	32	62																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86												
Horley North West Sector	Reigate and Banstead	1,510	2017/16	256	264	204	113	244	188																			
Jennet's Park, Peacock Lane	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28	16	65	47	0	0									
Northstowe Phase I	South Cambridgeshire	1,500	2016/17	13	140	278	243	256	178																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Sutton New Hall Farm	Cheshire West and Chester	1,500	2016/17	41	90	13	53	121	49																			
Burleyfields (part of the West of Stafford Strategic Development Location)	Stafford	1,500	2020/21	49	98	175																						
Hartland Park	Hart	1,500	2020/21	46	64	66																						
West Carclaze Eco-community	Cornwall	1,500	2021/22	11	60																							
Handley Chase - Sleaford South Quadrant	North Kesteven	1,450	2018/19	2	6	29	17	134*																				
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85	49	3														
Rochester Riverside	Medway	1,400	2019/20	126	117	88	127																					
Park Prewett Hospital, Aldermaston Road, Basingstoke	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16						
Northern Gateway (Airfields and former Corus site)	Flintshire	1,325	2020/21	112	135	36																						
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90	163	29	71									
Kings Moat Garden Village	Cheshire West and Chester	1,300	2019/20	5	83	138																						
Bolnore Village	Mid Sussex	1,279	2000/01	10	66	61	244	159	168	52	99	15	0	0	0	53	68	68	86	61	51	18						
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24																	
Blue Boar Lane	Broadland	1,233	2015/16	75	165	253	243	180	160	110	47																	
Picket Twenty	Test Valley	1,219	2011/12	147	178	180	176	164	145	175	96	155	169	124	38													
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101	61	78	47	1									
Staynor Hall	Selby	1,200	2005/06	1	69	170	28	45	57	53	42	111	90	84	65	46	31	22	15	25	13							
Trumpington Meadows	Cambridge	1,200	2011/12	2	137	141	67	105	89	123	148	72	128	48														
North Ely (Orchards Green)	East Cambridgeshire	1,200	2018/19	49	50	70	80																					
Winnington Urban Village	Cheshire West and Chester	1,200	2013/14	86	159	144	176	62	142	65	70	17																
Heyford Park (Former RAF Upper Heyford)	Cherwell	1,183	2014/15	46	166	106	103	97	58	76																		
Oxley Park (East & West)	Milton Keynes	1,159	2004/05	52	166	295	202	115	91	75	163																	
Icknield Port Loop	Birmingham	1,150	2019/20	40	175																							
North West Haverhill, Ann Suckling Road	West Suffolk	1,150	2020/21	89	40	80																						

*(+67 communal accommodation)

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Orchard Park, Cambridge	South Cambridgeshire	1,120	2006/07	100	290	148	103	95	56	34	16	75	39	30	2	42												
Velmead Farm, Fleet	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4												
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157	181	19	48																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15	119	111	115	124																				
Llanwern Village	Newport	1,100	2019/20	31	74	39	52																					
Land at Kingsley Fields	Cheshire East	1,100	2018/19	49	151	125	177																					
Cottam Strategic Site (MDI)	Preston	1,100	2014/15	23	15	61	46	58	43	101	114	211																
Land north of Woodhall Business Park	Brentwood	1,100	2022/23	20																								
Bankside Phase 1, Banbury (Longford Park)	Cherwell	1,090	2014/15	148	218	140	142	96	167	52																		
Highwood	Horsham	1,090	2012/13	56	82	103	76	96	39	71	43	1																
Highfields Farm	South Derbyshire	1,064	2016/17	141	204	275	252	102	57																			
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116	105	108	58	76																	
Gedling Colliery/ Chase Farm	Gedling	1,050	2017/18	25	65	96	64	90																				
North East Bexhill (The Gateway)	Rother	1,050	2020/21	23	67	68																						
South Maldon Garden Suburb	Maldon	1,042	2018/19	5	45	111	137	163																				
Tamworth Golf Course (Amington Garden Village)	Tamworth	1,037	2017/18	28	90	155	87	112	68																			
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122	155	70	100	87	81															
Northampton North of Whitehills SUE	Daventry	1,000	2015/16	9	108	176	59	44	125	124	71																	
Weldon Park SUE	North Northamptonshire	1,000	2016/17	39	62	111	74	75	126																			
Land at former TRL site, Nine Mile Ride (Buckler's Park)	Bracknell Forest	1,000	2018/19	35	132	59	59	140																				
Arkall Farm, North of Ashby Road, Tamworth	Lichfield	1,000	2021/22	4	75																							
Limebrook Park, Wycke Hill, Maldon	Maldon	1,000	2019/20	5	60	85	110																					
RAF Cardington	Bedford	1,000	2014/15	5	108	100	109	36	57	81	144	276																
Collingtree Park - Northampton South SUE (JCS Policy N5)	West Northamptonshire	1,000	2020/21	98	100																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Northampton Upton Park SUE (JCS Policy N9)	West Northamptonshire	1,000	2020/21	4	130	139																						
Folkestone Harbour/ Seafront	Folkestone and Hythe	1,000	2021/22	84	40																							
Land to the north of Totton	New Forest	1,000	2022/23	51																								
Land West of Uckfield	Wealden	1,000	2018/19	3	50	45	35																					
Taylors Farm/ Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12												
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	112	91	13																	
Little Stanion	North Northamptonshire	970	2009/10	106	116	74	121	102	93	89	86	27	26	9	1	30												
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60	75	103	73	93	23										
Ingress Park, Greenhithe	Dartford	950	2002/03	184	0	275	100	74	0	119	0	0																
Upper Cambourne	South Cambridgeshire	950	2012/13	88	123	239	201	96	81	83	32	7																
Nar Ouse Millenium Commuity	King's Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0	37	13												
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42	15	18	49	16	32						
Badbury Park (Commonhead)	Swindon	890	2014/15	49	230	241	138	127	73																			
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30															
Abbotswood	Test Valley	790	2011/12	30	190	157	114	152	90	20	0	10	27															
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																			
The Parks, formally Staff College	Bracknell Forest	730	2007/08	104	88	101	54	47	72	59	94	78	0	0	0	0	0	0	0									
Northside	Gateshead	718	1999/00	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43								
Land at West Blyth accessed from Chase Farm Drive	Northumberland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90	62	37	53	58	56										
Alver Village (Rowner Renewal Project)	Gosport	700	2010/11	4	100	70	45	89	101	79	97	8	27	10	0													
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110	70	61	88	0	76																	
Beacon Park (South Bradwell)	Great Yarmouth	700	2015/16	42	58	81	79	54	113																			
Foxhill/Mulberry Park	Bath and North East Somerset	700	2016/17	8	110	120	86	70	88																			
Land North of Harvest Ride and South of Forest Road and East of West End Lane, Warfeild	Bracknell Forest	675	2015/16	3	85	75	117	88	92	67	25																	

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Staiths South Bank	Gateshead	667	2003/04	24	58	0	44	0	48																			
Jurston Farm	Somerset West and Taunton	650	2019/20	16	43	31																						
Land south of Wansbeck General Hospital, Ashington	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54	50	60	82	64	0							
Kings Hill Phase 3	Tonbridge and Malling	635	2018/19	29	95	120	100																					
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0								
Ochre Yards (Ref: 103/01)	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2	0	0	46	4	52	2													
Land West of Southwater	Horsham	606	2017/18	56	128	43	20																					
Former Runwell Hospital	Chelmsford	575	2016/17	92	89	87	70	55	43	46																		
Land to the west of Wallingford	South Oxfordshire	555	2020/21	18																								
Land Nnorth of Netherhouse Copse	Hart	528	2021/22	52	104																							
Thingwall Lane	Knowsley	525	2013/14	79																								
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	0	14	13	18	15											
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																				
Land west of Copthorne	Mid Sussex	500	2019/20	3	68	74	112																					

Appendix 3:
Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
128-134 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4:
Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated – 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 – 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated – 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued -21/06/2002
Extended planning period	03/724/R – Reserved Matters for 99 units 03/725/R – Reserved Matters for 58 units 02/1252/R – Full application including 677 apartments 03/01973/R – Full application including 222 residential units 04/2474c – Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c – 394 units – granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 – 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM – Phase II – 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM – Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM – Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM – outline to redevelop for 720 units – extension of time to 02/03741/OUT 13/03015/FULM – Phase II 195 units 15/01709/OUTM – Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM – Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 – 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated – 10/03/2004 Decision Issued – 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated – 13/03/2018 Decision Issued – 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown – unable to obtain completions data to identify year of first completion
Build period	Ongoing – unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated – 05/02/2003 Decision Issued (appeal) – 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated – 19/04/2004 Decision Issued – 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase 1), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal – Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued – 30/07/2010 First reserved matters application (78681/RM/2012) Validated – 12/05/2012 Decision Issued – 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated – 09/07/2015 Decision Issued – 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated – 17/02/2020 Decision Issued – 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued – 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 – 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation – 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued – 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated – 30/07/2004 Decision Issued – 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 – 3
Notes from LPA	N/A

The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

Read more

You can read more of our research and insight at lichfields.uk

Our bespoke products, services and insights



Small builders, big burdens

How changes in planning have impacted on SME house builders



Making a bad situation worse

The impact on housing supply of proposed changes to the NPPF



Headroom

Objective assessments of local housing needs



Sizemix

Securing the right mix in residential development proposals

Contacts

Speak to your local office or visit our website.

Birmingham
Jon Kirby
jon.kirby@lichfields.uk
0121 713 1530

Bristol
Andrew Cockett
andrew.cockett@lichfields.uk
0117 403 1980

Cardiff
Simon Coop
simon.coop @lichfields.uk
029 2043 5880

Edinburgh
Nicola Woodward
nicola.woodward@lichfields.uk
0131 285 0670

Leeds
Christopher Darley
christopher.darley@lichfields.uk
0113 397 1397

London
Matthew Spry
matthew.spry@lichfields.uk
020 7837 4477

Manchester
Simon Pemberton
simon.pemberton@lichfields.uk
0161 837 6130

Newcastle
Michael Hepburn
michael.hepburn@lichfields.uk
0191 261 5685

Thames Valley
Daniel Lampard
daniel.lampard@lichfields.uk
0118 334 1920

Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no. 2778116. Registered office: The Minster Building, 21 Mincing Lane, London EC3R 7AG.
© Nathaniel Lichfield & Partners Ltd 2024. All rights reserved.

2394

Taylor Wimpey

Monmouthshire County Council Replacement Local Development Plan – Deposit Plan Consultation Response

Prepared for:

Taylor Wimpey – in connection to Ifton Manor Farm (ref. CS0253/CS0254)

Prepared by:

Savills
2 Kingsway
Cardiff
CF10 3FD

Contents

1.	**Introduction**	**1**
2.	**Candidate Site Assessment of Ifton Manor Farm (CS0253)**	**3**
3.	**Question 2 - Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)**	**6**
4.	**Question 3 - Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)**	**9**
5.	**Question 4 - Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)**	**11**
6.	**Question 10 - Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)**	**14**
7.	**Question 14: Do you have any comments on the sustainable transport policies?**	**24**

Appendices

Appendix A: Response to the Preferred Strategy prepared on behalf of Taylor Wimpey PLC in relation to Ifton Manor Farm, Caldicot (CS0253 and CS0254), January 2023
Appendix B: Vision Statement
Appendix C: Agricultural Land Classification and Soil Study survey, July 2020
Appendix D: Severn Tunnel Junction Station with enhancements to Station Road
Appendix E: ALDP Housing Delivery Table
Appendix F: 'Start to Finish – How quickly do large-scale housing sites deliver? Third Edition' Lichfields, March 2024
Appendix G: Office Market Letter for Caldicot, December 2024

1. Introduction

1.1. Savills is instructed by Taylor Wimpey ('Taylor Wimpey') to provide a response to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by Monmouthshire County Council ('MCC').

1.2. The submission is made in the context of Taylor Wimpey's position as the promoter of Sites ID CS0253/CS0254 ('Ifton Manor Farm'). The site is being promoted for a residential-led mixed use development comprising of 440 homes and 1ha of employment with supporting open space and green infrastructure.

1.3. The site was originally submitted as a candidate site as part of the Stage 1 Call for Sites in November 2018 by Cancer Research UK and the RSPCA (as joint landowners). Since the Stage 1 Call for Sites, Taylor Wimpey has entered into an option agreement with the landowners to promote the site for a housing led development.

1.4. As part of the Stage 2 Call for Sites, two separate submissions were made – one for Ifton Manor Farm Site A (ref. CS0253) and a second for Ifton Manor Farm Site B (ref. CS0254). A comprehensive site submission was made that demonstrated that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. This submission consisted of the following information:

- Constraints and Opportunities Plans (prepared by EDP);
- Transport Appraisal (prepared by David Tucker Associates);
- Agricultural Land Classification and Soil Resources Survey (prepared by Reading Agricultural Consultants);
- Preliminary Ecological Appraisal (prepared by Soltys Brewster);
- Historic Environment Desk-Based Assessment (prepared by Cotswold Archaeology);
- Landscape and Visual impact Assessment (prepared by EDP);
- Tackling Climate Change Statement (Taylor Wimpey);
- Multi-Utility Infrastructure Feasibility Study (prepared by SMS);
- Drainage Strategy (prepared by ThinkUrban); and
- High Level Viability Appraisal (prepared by Savills).

1.5. Since then, and on behalf of Taylor Wimpey , Savills have also responded to the two consultations on the Preferred Strategy in August 2021 and again in August 2023, commenting on the proposed growth and spatial options that were presented.

1.6. This supporting statement responds to the Deposit Plan consultation and is split into the relevant themes and consultation questions, commenting on the various supporting documents and technical evidence base. The penultimate section of this statement relates specifically to Land at Ifton Manor Farm and its merits for development, demonstrating the site is available, deliverable and achievable. Lastly, the test of

soundness has been applied and sets out Taylor Wimpey's position on whether the Deposit Plan is considered clear and consistent with other LDPs, appropriate, and effective. The below table sets out the questions that are answered and, within these, which specific policies are commented on as well as Taylor Wimpey's position on these.

Question	Policy	Support or Object
2	Policy S1	Object
3	Policy S2	Object
4	Policy GW1	Object
10	Policy HA4	Object
14	Policy ST5	Object

1.7. In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment of Ifton Manor Farm (CS0253)

2.1. All candidate sites are assessed as part of the Candidate Site Assessment (2024) report published on MCC's website which provides commentary on why Ifton Manor Farm has not progressed through stage 3a/3b and therefore not taken forward as a Deposit Allocation. The reason as set out for it not progressing through to an allocation is below:

> *'Site not progressing as it is designated as a green wedge in the RLDP where there is a presumption against new built development. and due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land. The site also comprises 100% BMV land (38% of which relates to Grade 1 BMV). Overall, there are considered to be more suitable alternative sites in the Severnside area and, therefore, the site is not allocated in the RLDP.'*

2.2. Taylor Wimpey wholly disagrees with this conclusion and consider that the site should progress and be included within the deposit plan allocations. From the above, it is clear that the Ifton Manor Farm site did not pass the Stage 3a / 3b assessment process for two reasons – its status as a Green Wedge and the proportion of the site that is best and most versatile agricultural land. Each of these points are considered in turn below:

Green Wedge

2.3. Taylor Wimpey comment in considerably more detail on matters relating to the Green Wedge assessment work that has been undertaken in response to Question 4 about Policy GW1.

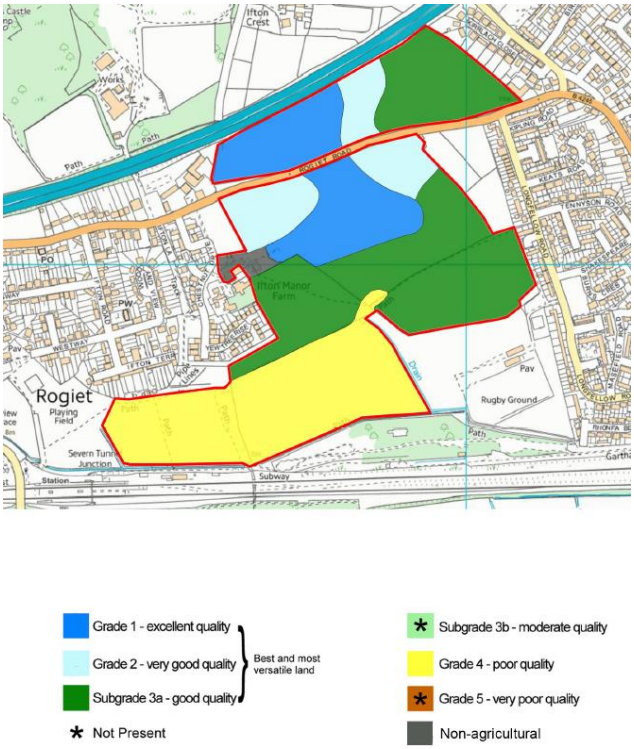
2.4. Taylor Wimpey's concern is that the Green Wedge Assessment undertaken by LUC does not consider the urbanising effect that the delivery of the Severn Tunnel Junction Railway Station Link Road will have on the performance of the parcel of land against the five tests for Green Wedges. This is despite the Deposit RLDP specifically supporting the delivery of this piece of infrastructure and requiring the safeguarding of land for it under Policy ST5 (Transport Schemes).

2.5. In response to Question 4, Taylor Wimpey have therefore undertaken an assessment of the site against the five tests for Green Wedges on the basis of the Severn Tunnel Junction Railway Station Link Road, concluding that the parcel performs considerably worse against these tests such that it should not warrant designation as a Green Wedge.

Agricultural Land

2.6. Submitted as part of the Stage 2 Call for Sites, but seemingly not considered as part of the candidate site assessment process, was an Agricultural Land Classification and Soil Resources Survey undertaken by Reading Agricultural Consultants.

2.7. This confirmed that the site was a mosaic of Grades 1, 2, 4a, and 4. As shown in the diagram below



2.8. This suggests that 71% rather than 100% of the site is best and most versatile agricultural land and, whilst the entirety of the portion of the site where built development is proposed is considered best and most versatile agricultural land, the proportion of the site that is Grade 1 agricultural land is in fact 19% rather than 38%.

2.9. This is not unusual for the Severnside-sub region or for Monmouthshire as a whole. The 2023 Preferred Strategy recognises this, stating that:

> *'While growth will be focused in the most sustainable settlements, it must be recognised that landscape quality and agricultural land quality are high throughout the County, and as such these challenges cannot be avoided via a different spatial option. For example, all of our settlements are surrounded by agricultural land with a high level classification as best and most versatile land. Rather, the RLDP will seek to allocate those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which will require balanced consideration and trade-offs at Deposit Plan stage.'*

2.10. Whilst Paragraph 3.1.7 of the Deposit RLDP states that:

> *'A key consideration in assessing the Candidate Sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire. The widespread distribution of BMV agricultural land throughout Monmouthshire means that it does not affect the spatial strategy: all four of our primary settlements are surrounded by BMV agricultural land, so it is not possible to avoid the development of such land via a different spatial strategy.'*

2.11. The message here is clear and Taylor Wimpey is concerned that, on one hand there is a clear recognition of the significant amount of best and most versatile agricultural land and its lack of ability to act as a constraint given that it effects all Tier 1 settlements, but on the other hand Ifton Manor Farm has not been progressed as a candidate site because of the presence of best and most versatile agricultural land.

2.12. This is particularly concerning given that the extent of the Land to the East of Caldicot/North of Portskewett site where development is proposed is also entirely best and most versatile agricultural land and scores exactly the same against this criteria as the Ifton Manor Farm site in the Candidate Site Assessment Integrated Sustainability Appraisal (September 2024) prepared by AECOM.

3. QUESTION 2 - Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

3.1. Strategic Policy S1 (Growth Strategy) of the Deposit Plan outlines the housing and employment land requirements for the Replacement Local Development Plan (RLDP) period. Policy S1 sets out the housing growth for Monmouthshire between 2018 and 2033 with a housing requirement of 5,400 homes plus 15% flexibility allowance raising the housing provision to 6,210 homes.

Selected Growth Option

3.2. Taylor Wimpey have engaged throughout the consideration of the Growth Strategy, providing comments on both versions of the Preferred Strategy. Our response to January 2023 Preferred Strategy is included as Appendix A and therefore those comments are not repeated here, but Taylor Wimpey's position has been that Growth Option 1 (which was effectively the continuation of the growth strategy presented in the 2021 version of the Preferred Strategy) should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (September 2022). The assessment of the Growth Options as presented in the Growth and Spatial Options Paper is replicated below:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

3.3. Whilst it is recognised that Welsh Government raised a non-conformity objection to the use of Growth Option 1, instead requiring the selection of Growth Option 2 to align with the position of Monmouthshire outside of the National Growth Area in Future Wales: The National Plan 2040, Taylor Wimpey's view is that it is unsound to select a growth option that performs less well in the analysis contained within the Growth and Spatial Options Paper September 2022 than other growth options that were considered but dismissed.

3.4. Given that this policy serves as a foundation for other policies that will be included in the RLDP, the effect is that an unsound approach to Policy S1 infects the direction taken by other policies and the approach to site allocation.

3.5. For housing, the selection of a lower Growth Option, as well as being fundamentally unsound for the reason set out above, means that the starting point with regards to the number and type of sites to be allocated is incorrect.

3.6. Taylor Wimpey's comments at that stage also suggested that, if Growth Option 2 were to be used (this being the option presented in the 2023 version of the Preferred Strategy and carried forward in the Deposit RLDP) then it needs to uplifted to reflect:

- The increased level of net inflow from nearby English authorities in recent years rather than making an assumption of an average inflow from these authorities over a far longer period of time; and
- The divergence between the 2018-based household projections and the 2021 Census actual number of households. If this were to be extrapolated over the RLDP plan period, this could represent a significant under estimation of growth in households.

3.7. This is a sound and evidence-based approach and one which the Development Plans Manual allows for.

Extent of Flexibility Allowance

3.8. The Deposit Plan proposes the application of a 15% flexibility allowance on top of the housing requirement of 5,400 homes so that the RLDP will make provision for 6,210 homes.

3.9. Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum) but that a higher flexibility allowance can be applied through an evidence based approach that demonstrates the need for it.

3.10. Taylor Wimpey welcomes the increase in the flexibility allowance from 10% previously proposed at Preferred Strategy stage. Taylor Wimpey also commented that the flexibility allowance should be increased from the 10% figure presented at Preferred Strategy stage and, in that sense, it is positive to see that the Deposit proposes that this is increased to 15%.

3.11. That said, Taylor Wimpey continue to have concerns that even this figure is inadequate based on the under delivery over the adopted LDP plan period where the 2022 Annual Monitoring Report's recognised that only 66% of homes planned for had been delivered.

3.12. The Development Plans Manual allows for the use of a bespoke flexibility allowance if properly evidenced and Taylor Wimpey suggest that the shortfall in housing delivery over the ALDP plan period provides that justification for the incorporation of a higher flexibility allowance.

3.13. The use of flexibility allowances in excess of 10% has recently been established in the cases of both the Bridgend RLDP (which incorporates a 14% flexibility allowance) and Merthyr Tydfil (which incorporates a 25% flexibility allowance).

3.14. Whilst it is recognised that a flexibility allowance of 34% driven by the ALDP shortfall in delivery is probably unrealistic, a flexibility allowance of 20% that sits between the Bridgend and Merthyr Tydfil examples seems appropriate.

4. QUESTION 3 - Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

4.1. The purpose of this policy is to establish a settlement hierarchy and spatial distribution of growth, as well as setting out how the requirement set out in Policy S1 will be met through the existing landbank, allowances for windfall sites, and new housing allocations made in the RLDP. Each point is commented upon in terms below:

Spatial Strategy

4.2. The proposed hierarchy places Caldicot (as part of the wider Severnside sub-region incorporating Rogiet) within Tier 1 of the settlement hierarchy, forming a main focus for new development through the plan period. This approach is obviously supported and reflects the suitability of the Severnside corridor for strategic growth – both because of the services within it and its regional connectivity.

4.3. Building on this, Taylor Wimpey support the approach of centralising Caldicot as the core settlement within the Severnside sub-region. This reflects that it is the most sustainable and best connected of the settlements within the corridor as well as containing the greatest range of services. Likewise, Taylor Wimpey support the direction that the Deposit RLDP seeks to take in terms of directing the vast majority of Severnside growth to Caldicot (albeit, as set out in response to subsequent questions, Taylor Wimpey do not support the proposed site allocation).

4.4. Since the consultation on the Preferred Strategy, the phosphate issue within Monmouth has been resolved with Dwr Cymru Welsh Water confirming plans to improve the waste water treatment works' phosphate stripping capacity such that it can be relied upon to deliver a degree of new housing. Taylor Wimpey recognise that Monmouth is a Tier 1 settlement and that it is appropriate to direct a degree of growth towards it but Taylor Wimpey note that this has been solely at the expense of the Severnside:

	Preferred Strategy		Deposit	
	% of Distribution	No. of Homes	% of Distribution	No. of Homes
Severnside	44	2,609	35	2,190
Monmouth	5	275	15	923

4.5. This was reported to Full Council in October 2023 (where it was narrowly approved). The explanation that is provided in the Report to Full Council is as follows:

'The updated Preferred Strategy allows for housing and employment growth in Monmouth, resulting in a redistribution of growth and a reduction in the scale of the strategic site at Caldicot East and Severnside overall (new allocations reduced from 1,200 homes to 825 homes), as described in Paragraph 3.19.'

4.6. It seems like the Deposit RLDP does not propose to make up this 375 home reduction in the Severnside sub-region through any new allocations.

4.7. The Report does not explain why it is the case that the proportion of new development directed to a single Tier 1 cluster has been so drastically reduced but the proportion of new housing to be directed towards the other Tier 1 settlements or in fact other tiers of the settlement hierarchy (which are inherently less sustainable than Caldicot) remains unchanged.

4.8. Such a pivot away from Severnside and adjustment to the distribution of growth, without being fully explained and justified, seems totally unsound.

Table 2

4.9. Table 2 of the Deposit RLDP provides a summary of the spatial distribution of housing provision, effectively breaking down the number of homes to be delivered in each settlement into completions, commitments, allowances, rollover allocations, and new allocations.

4.10. Taylor Wimpey commented extensively on this as part of the Preferred Strategy and, again, these representations are re-attached to this Statement rather than repeated again within these representations. Nevertheless, Taylor Wimpey's concerns still remain that:

- Save for the flexibility allowance applied on the housing requirement, no specific allowance is made for either the non-delivery or reduced capacity of both the existing commitments and rollover allocations;
- In calculating the windfall allowances, no discount is applied to other tiers of the settlement hierarchy as it follows, equally, that the delivery of windfall sites in these settlements has also become more challenging over time;
- No allowance is made for demolition of existing properties required to facilitate the delivery of windfalls.

5. QUESTION 4 - Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

5.1. As a starting point, Taylor Wimpey support MCC's approach to review the existing green wedges in the current LDP to assess whether they still meet the five purposes listed in Paragraph 3.67 of PPW 12.

5.2. The Green Wedge Assessment (March 2024) prepared by LUC effectively divides undeveloped land surrounding settlements into a series of parcels and then assesses their performance against PPW's five tests, ranking the performance of a parcel against each test as either Weak / No, Equal, Moderate, or Strong, before overall concluding whether a parcel has a High, Moderate-High, Moderate, Moderate-Low, or Low potential for designation as a Green Wedge.

5.3. The existing Green Wedge between Rogiet and Caldicot is split into four different parcels. Given that Taylor Wimpey's proposal limits built development only to Parcel RC3, only this parcel is considered further in this section. The approach taken in the Assessment is to suggest that Parcel RC3 has a High potential for designation as Green Wedge.

5.4. Taylor Wimpey's concern is that the review of this particular Green Wedge fails to consider the planned and safeguarded Severn Tunnel Junction Railway Station Link Road (commented on specifically in connection to Question 14) and the impact that its future delivery would have on the performance of any Green Wedge in this location against the five Green Wedge tests. It is clear that the aspiration of this link road has been given absolutely no consideration in the Green Wedge Assessment and there is no reference whatsoever to it in the description of Parcel RC3

5.5. A review of the Green Wedge Assessment (March 2024) has been undertaken below against the five purposes for Green Wedges that are set out in PPW.

5.6. The potential for designation as Green Wedge has been revisited on the basis of Option 1 of the 'Improving access to Severn Tunnel' Report. This is because it is the routing option that Taylor Wimpey have supported in previous representations and it best reflect the wording of Policy ST5. Given that there is a north-south spine through the site that is within Flood Zone 3 in the emerging Flood Maps for Planning, it follows that any link road would need to be elevated to be flood free.

5.7. The below assessment has also been undertaken on the basis of the masterplanning work for the site that has previously been undertaken by EDP which takes a green infrastructure led approach and incorporates a considerable undeveloped portion of land either side of the proposed Severn Tunnel Junction Railway Station link road.

Green Wedge Purpose	MCC Assessment RC3		Savills Assessment	
Purpose 1	Strong	• The parcel lies in a narrow gap between Rogiet and Caldicot, and so contributes to preventing their merger. • Land has a degree of distinction from the urban area.	Weak	The delivery of the Severn Tunnel Junction Railway Station Link Road would provide a clear and defensible boundary that acts to effectively contain Rogiet to the west and Caldicot to the east, preventing coalescence and managing uncontrolled urban expansion. In that sense, the act of designating this parcel as a Green Wedge has no function in preventing the coalescence of settlements as this is effectively achieved by the link road itself which also acts as a tool to manage settlement expansion. Further, the landscaping proposed as part of Taylor Wimpey's masterplanning for the site continues to ensure visual separation between the two settlements.
Purpose 2	Moderate	• The parcel lies adjacent to the urban area of Rogiet and Caldicot and so contributes to managing their form. • Land has a degree of distinction from the urban area.	Weak	
Purpose 3	Moderate	• The parcel is part of the countryside and so contributes to preventing encroachment on it. • Land has a degree of distinction from the urban area.	Weak	It is noted that the parcel currently sits outside the settlement boundaries for both Rogiet and Caldicot, and therefore in considered to be in the open countryside. However, when looking at the wider context of the site and understanding the surrounding constraints, the contribution parcel RC3 makes to safeguarding the countryside from encroachment is questioned due the existing transport infrastructure that straddles the northern and southern boundary of Rogiet and Caldicot, as well as the B4245 which entirely bisects the parcel.
Purpose 4	Moderate	• Rogiet and Caldicot are composed primarily of late 20th-century residential development with limited distinctiveness. The latter has a historic core, with a Conservation Area centred on Caldicot Castle, but the parcel has no relationship with this. • However, the mature tree belt south of the B4245, associated with the former Ifton Manor Farm, is a distinctive settlement edge feature, and the parcel as a whole forms a rural setting that maintains the separate identities of Rogiet and Caldicot.	Moderate	Taylor Wimpey supports the notion that the residential development of Rogiet and Caldicot have limited distinctiveness. Taylor Wimpey strongly agrees the parcel has no relationship with the historic core of Caldicot.
Purpose 5	Equal	• All green wedge land makes an equal contribution to this purpose.	Equal	No comment.

5.8. The message here is clear – it cannot be sound for the Deposit RLDP to propose the designation of land as a Green Wedge when the assessment work that underpins its designation fails entirely to consider a piece of infrastructure that the Deposit RLDP safeguards land for the delivery of.

5.9. The effect is that the Green Wedge Assessment suggests that Parcel RC3 has high potential for designation as a Green Wedge when the analysis undertaken by Savills which considers the impacts of the delivery of the Severn Tunnel Junction Railway Station suggests that in fact it has a far lower potential for designation as a Green Wedge and that in fact that the delivery of a link road in this location has a significant urbanising effect on the landscape, particularly given that flooding constraints across the site mean that it is likely to need to be raised.

5.10. This is particularly important given that one of the reasons that the site has been dismissed as part of the candidate site assessment process is because:

> *'…due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land.'*

5.11. Taylor Wimpey's position is that the assessment work that has been undertaken to inform the designation of the site that Taylor Wimpey is promoting as a Green Wedge is entirely unsound and that this in turn has led to a failure to properly assess the performance of the candidate site.

6. QUESTION 10 - Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Policy HA2 - Land to the East of Caldicot/North of Portskewett

6.1. This section of the Statement relates specifically to the Land to the East of Caldicot/North of Portskewett site that is proposed to be allocated as part of the Deposit RLDP under Policy HA2. The policy wording makes provision for the delivery of 770 homes, a primary school, 1ha of land for office accommodation, and a neighbourhood centre.

6.2. The Land to the East of Caldicot/North of Portskewett site was first identified as a potential strategic scale site in Severnside as part of the 2023 Preferred Strategy. This built upon the 2021 Preferred Strategy which identified a number of potential direction for strategic growth, including both the Land to the East of Caldicot/North of Portskewett site and Ifton Manor Farm.

6.3. Taylor Wimpey's position with regards to the Land to the East of Caldicot/North of Portskewett site is twofold:

- The Land to the East of Caldicot/North of Portskewett is a considerably worse performing site than the Ifton Manor Farm and the approach should therefore be to allocate the Ifton Manor Farm site instead; and
- Even if the Land to the East of Caldicot/North of Portskewett site is allocated, it will not deliver the number of homes that the Deposit RLDP expects it to over the plan period and therefore further allocations need to be made in the Severnside, including Taylor Wimpey's Ifton Manor Farm site.

6.4. Both of these points are considered in turn below:

Suitability of Land to the East of Caldicot/North of Portskewett Instead of Ifton Manor Farm

6.5. Included as part of the Deposit RLDP evidence base is the ISA Framework. The ISA framework sets out the relevant criteria each site is assessed against for each objective, where their performance has been given a score based on the significance of the impact – from negative to positive. MCC provide commentary against the ISA assessment for each subtopic per candidate site.

6.6. The ISA technical annex containing the candidate site assessment (September 2024) has been examined, with a particular focus on the comments provided for Ifton Manor Farm (candidate site ref. CS0253) under the ten ISA topics. Savills have responded to each of the comments provided by MCC and prepared a revised assessment, adjusting the score provided where required. This is set out in the supporting tables overleaf.

ISA Topic	MCC Assessment	MCC Commentary	Savills Assessment	Savills Commentary
Economy and employment	++	New employment land proposed at the site. The site is proposed for mixed-use development, including employment use (B1/ B2/ B8).	++	No comment.
Population and communities	-	The site could deliver new homes or employment land; however, the site partially intersects with a designated green wedge. The site has capacity to deliver 440 new homes; however, it almost wholly intersects with a designated green wedge.	-	Taylor Wimpey acknowledges that whilst the site is currently intersecting with a designated green wedge, it has significant potential to provide circa 440 good quality market and affordable homes, and community infrastructure, in an extremely sustainable location. The site also presents the opportunity for an element of employment use to compliment the surrounding facilities along the B4245.
	++	The site is within reasonable walking distance (≤800m) to a primary and a secondary school (≤1,600m). The site is 400-500m from the nearest primary school (Dewstow Primary) and 1,200-1,300m from the nearest secondary school (Caldicot Comprehensive).	++	No comment.
Health and wellbeing	++	The site is within 800m of a health service and an active travel route. The site is 400-500m from the nearest dentist (Teeth for Life, Caldicot), 500-600m from the nearest GP surgery (Caldicot Health Centre, Caldicot), and it intersects with a PRoW (378/10/4)	++	No comment.
	++	The site is within 800m of a formal leisure and green space. The site is 100-200m from the nearest area of amenity importance and 50-100m from the nearest green space (play space).	++	No comment..
Equalities, diversity and inclusion	-	The site falls within one of the 50% least deprived LSOAs in Wales. The site falls within the Rogiet LSOA, which is amongst the 30-40% least deprived LSOAs in Wales.	?	Taylor Wimpey notes the site's location within the Rogiet LSOA, however this LSOA covers a significant area compared to the neighbouring LSOAs within Caldicot. The deprivation levels of the Rogiet LSOA does therefore not provide an accurate depiction of the neighbouring community of the site within Rogiet. The neighbouring 'West End' LSOA of Caldicot covers a significantly smaller area and provides a more localised view of deprivation levels surrounding the site. Taylor Wimpey therefore considers the assessment of the site under this ISA topic should be revisited to account for the neighbouring levels of deprivation.

				This is of particular importance for the site, where the West End scores significantly lower for overall deprivation, ranking within amongst the 30-50% most deprive LSOAs within MCC[1]. This demonstrates the site's potential to address poverty and inequality within the surrounding communities of both Rogiet and Caldicot. Ifton Manor Farm presents the opportunity to incorporate an element of community facilities within the proposed development. Given the site's extremely sustainable location, the provision of community facilities within the development would not only foster community cohesion within its immediate context but allow for its facilities to be accessed by a greater number of people in both Rogiet and Caldicot.
Transport and movement	++	The site is within close proximity (≤800m) to a railway station or bus stop, neighbourhood centre or central shopping area, and an active travel route. The site is 0-50m from the nearest bus stop (Cherry Tree Nursing Home, Ifton Quarry), 400-500m from the nearest neighbourhood centre (West End, Caldicot), and it intersects with a PRoW (378/10/4). It is also 449m from the nearest National Cycle Network route.	++	No comment.
Natural resources	+	The site does not intersect with an AQMA.	+	No comment.
	-	The site contains or is in close proximity to a waterbody, and/ or falls within the River Wye Catchment Area. The site is 984m from the nearest waterbody (river).	0	Whilst the site is located within proximity to the river, there are no concerns with regards to the development of the site with regards to the risk of flooding or the ability to deliver the required surface water drainage arrangements. Together with a robust green infrastructure and drainage scheme, the development of Ifton Manor Farm would seek to conserve, protect and enhance the surrounding water environment, water quality and water resources.
	+	The site does not intersect with a Groundwater Source Protection Zone (SPZ).	+	No comment.
	+	The site does not intersect with a Nitrate Vulnerable Zone (NVZ).	+	No comment.

[1] https://wimd.gov.wales/lsoa/w01001598?lang=en

	--	The site is wholly greenfield land and contains high quality agricultural land (Grade 1, 2 and 3a). The site is currently used for agriculture.	--	No comment.
	--	The site is within a mineral safeguarding area. The site is within a mineral safeguarding area for carboniferous limestone, and sand and gravel.	0	The site's location between two long established residential settlements significantly question's the site's ability to safeguard minerals due to the surrounding land uses that are sensitive to mineral extraction. The residential nature of development along both the edges of Rogiet and Caldicot, contribute to the sensitive development surrounding the safeguarded area and therefore significantly reduces the potential for mineral extraction. In turn, this questions the justification for this designation where serious concerns are raised towards the potential for unacceptable amenity impacts should minerals be extracted. Furthermore, Taylor Wimpey have doubts that mineral extract would be viable and technically feasible in this location given the substantial mitigations and buffer zones that would likely be required. A minimum buffer of 200m from sensitive development is recommended which would render most of the unacceptable for extraction given the distance between Rogiet and west Caldicot is circa 550m. As such, whilst the site's future development would sterilise the mineral resource this would likely be negligible where the extraction of minerals in this location would likely be inappropriate and unviable. Consequently, this designation should not impede upon the site's ability to deliver future residential-led development.
Biodiversity and geodiversity	-	The site intersects or is adjacent to a regionally or locally (LNRs and SINCs) designated site and/ or priority habitats/ species. The eastern boundary of the site is adjacent to a SINC (West of Caldicot). In addition, the site is 118m from the nearest priority habitat (open mosaic habitat on previously developed land), 393m from the nearest area of ancient woodland, and 670m from the nearest SSSI (Rectory Meadow – Rogiet).	0	The development of Ifton Manor Farm presents the opportunity to enhance the existing biodiversity of the site. As stated in the Preliminary Ecological Appraisal, the areas of the site which are used for agricultural purposes, and this is the vast majority of the site with the exception of field boundaries and the fringes of the site, is of very little ecological interest with the features of ecological value being the hedgerow network which separates fields.

				Due to the low ecological value of much of the site there are substantial opportunities to deliver a biodiversity net gain through the design and management of various forms of public open space and the large undeveloped areas of land across the site. The southern part of the site, for example, due to its current flood risk position precluding built development, provides extensive opportunities for biodiversity enhancement across the site through successful improvement measures. As such, Taylor Wimpey considers this to provide a net benefit of the site and warrant a positive score.
Historic environment	--	Development at the site has the potential for a significant negative effect on the historic environment. The site wholly intersects an archaeologically sensitive area. In addition, the site is 410m from the nearest grade II* listed building and 435m from the nearest grade II listed building. The site is very large (19.5ha) and development is likely to disturb on-site archaeological remains.	?	Given Caldicot is identified as a strategic growth area in the County, any suitable sites for residential development within and around the town will be subject to similar archaeological concerns. The Area of Archaeological Sensitivity wraps around much of Caldicot with only the northern extent beyond the M48 outside this constraint. The proposed development will be master planned to limit any potential impact on surrounding listed buildings and be designed to sensitively respond to the surrounding context with appropriate screening where required.
Landscape	+	The site does not intersect with an Area of Outstanding Natural Beauty, National Park or Country Park.	++	Whilst the site does not comprise brownfield land, it does not intersect an AONB, National Park or Country Park and therefore greater recognition should be given to its development potential. As noted in the Deposit Plan, greenfield development is required in order to form a robust and sustainable growth strategy for the County given the 'limited brownfield resource available in Monmouthshire'. Locations such as Ifton Manor Farm which have no significant landscape constraints.
Climate change	+	The site does not intersect with a high fluvial flood risk area (Flood Zone 2 and 3).	+	No comment.
	-	The site intersects with Flood Zone 2 or 3. Less than 50% of the site intersects with surface water Flood Zone 2 or 3. However, it is recognised that this is isolated to two small areas within the site.	+	As noted in MCC's assessment, only isolated areas within the site intersect with Flood Zone 2 or 3 where no development is proposed.

6.7. A subsequent comparison exercise has been performed between Ifton Manor Farm and the proposed residential allocation of the Land to the East of Caldicot/North of Portskewett site. The table shows both the scoring of the Ifton Manor Farm site according to the ISA and also when subject to Taylor Wimpey's analysis.

ISA Topic	ISA Scoring - Ifton Manor Farm	Taylor Wimpey Suggested Scoring - Ifton Manor Farm	ISA Scoring - Land to the East of Caldicot/North of Portskewett
Economy and employment	++	++	+
Population and communities	-	-	++
	++	++	++
Health and wellbeing	++	++	++
	++	++	++
Equalities, diversity and inclusion	-	?	-
Transport and movement	++	++	++
Natural resources	+	+	+
	-	-	-
	+	0	-
	+	+	+
	--	--	-
	--	-	--
Biodiversity and geodiversity	-	0	--
Historic environment	--	?	--
Landscape	+	++	?
Climate change	+	+	-
	-	+	-

6.8. This is summarised further as per the table below:

	++	+	?	0	-	--
ISA Scoring - Ifton Manor Farm	5	5	0	0	5	3
ISA Scoring - East of Caldicot/North of Portskewett	5	3	1	0	6	3
TW Suggested Scoring - Ifton Manor Farm	6	4	2	2	3	1

6.9. From the above analysis, it is clear that the ISA scores the Ifton Manor Farm site more strongly that the Land East of Caldicot/North of Portskewett site – it has fewer '-' scores and more '+' scores. Taylor Wimpey suggest that the proposed approach taken in the Deposit RLDP is therefore unsound in that it seeks to allocate a site that performs worse than an alternative site in the same tier of the settlement hierarchy.

6.10. Taylor Wimpey note that the Ifton Manor Farm site is smaller than the Land East of Caldicot/North of Portskewett site but this should not result in its dismissal as part of the candidate site process with a far sounder approach being to allocate the Ifton Manor Farm site in full with any residual requirement that is unmet in the Severnside sub-region to be delivered at a reduced Land East of Caldicot/North of Portskewett site. This aligns with the below point that Taylor Wimpey make with regards to the inability of the Land East of Caldicot/North of Portskewett site to deliver the forecast number of homes in the RLDP plan period.

Ability of Land to the East of Caldicot/North of Portskewett to Deliver the Forecast Number of Homes

6.11. Notwithstanding the above commentary around the suitability of the Land to the East of Caldicot/North of Portskewett site for allocation (and the suggestion is that the Ifton Manor Farm site is more suitable), Taylor Wimpey have serious concerns around the assumed delivery rate of the Land to the East of Caldicot/North of Portskewett site and suggest that, if it were to be allocated as part of the RLDP, it would not deliver the number of homes that the RLDP envisages that it would. This is a point that Taylor Wimpey has made throughout the preparation of the RLDP, providing comments at Preferred Strategy stage and making the same points at the Housing Stakeholder Group meeting on 5th September 2024 (as reported in Appendix 2 of the Housing Background Paper).

6.12. There are two reasons for this. Firstly, it will take longer to begin delivering homes than the Housing Trajectory suggests and, secondly, delivery rates will not be as high as the Housing Trajectory anticipates once delivery of homes does commence. This can be evidenced both from experience of the adopted Local Development Plan (ALDP)[2] and the headlines from the 'Start to Finish 3: How Quickly do Large-Scale Housing Sites Deliver?' paper prepared by Lichfields[3].

6.13. Each of these drivers is set out below:

Timescales for Delivery

6.14. The Housing Trajectory assumes that the Land to the East of Caldicot/North of Portskewett site will begin delivering homes from 2027/2028. This is based on a situation where the pre-application phase takes place for sixth months, a planning application takes 12 months to determine, and then there is a sixth month period between the grant of planning permission and the commencement of development onsite.

6.15. Given that the Housing Trajectory assumes that the site will deliver 75 homes in the first part of the 2027/2028 period, this must assume that an application is submitted in the very first part of the 2025/2026 period (i.e. probably by Summer 2025). This is considered to be incredibly unlikely given that it would rely on the site promoter submitting a planning application in advance of the adoption of the RLDP and doing so whilst the RLDP is subject to Examination (and MCC being able to robustly determine the application in the 12 month assumed timescales during this period).

6.16. It should also be noted that, of the ALDP's strategic sites, only one of the seven was submitted in advance of adoption of the ALDP. This was Wonastow Road, Monmouth which was an allocation in the previous Unitary Development Plan. This is a similar experience to in Bridgend where there were no applications for any of the strategic sites submitted in advance of adoption of the RLDP and where no applications have been submitted since its adoption in March 2024.

6.17. The above analysis is generous to the promoters of the Land to the East of Caldicot/North of Portskewett site in that it assumes first completion at the point where development commences onsite where-as clearly

[2] This is included at Appendix E. It provides an analysis of the times taken for the determination of planning applications for the seven strategic sites in the ALDP, as well as the annual delivery rates that these sites have achieved.

[3] This is the third edition of a piece of work undertaken by Lichfields. It uses data from sites across the UK to provide average figures relating to housing delivery depending on site capacity. It is available at this link.

this will not be the case given that inherently the build process is such that a certain amount of site wide works need to take place before first completion.

6.18. With a Deposit considered by Full Council in October 2024 and Examination likely to take place across much of 2025, a submission being made in the 2026/2027 period when the RLDP has been adopted would feel more likely as this is the point that there would be the certainty to progress a planning application.

6.19. The ALDP Housing Delivery Table at Appendix E provides the average length of time that it took between the submission of a first planning application and completion of the first house onsite across the seven strategic sites within the ALDP. This shows an average period of time from the submission of the first application to first completion of a property of four years, with a range between two and six years though little relationship of these timescales and the size of a site.

6.20. All of the strategic sites that are allocated in the ALDP are considerably smaller than the Land to the East of Caldicot/North of Portskewett site and therefore the above timescales, whilst very helpful, do not reflect how these timescales are impacted for larger sites.

6.21. The Lichfields' Paper is therefore useful in that it provides a more forensic analysis of these timescales for sites of varying sizes across the UK. It is considered that the 1,000 to 1,499 category is the right one to include the Land to the East of Caldicot/North of Portskewett site within. Whilst the site is to deliver 770 homes within the RLDP plan period, the Preferred Strategy identifies the site as having capacity for 1,460 homes and its size (and the composition of the candidate sites that form it) remains unchanged.

6.22. According to the Litchfield's paper, for sites of between 1,000 and 1,499 homes, it takes on average 6.2 years from the submission of a first planning application through to first completion on site. This breaks down into 4.9 years for the consideration of all necessary planning applications and 1.3 years between then and first completion.

6.23. There are also added complexities given how the site is being promoted which probably mean that this should be seen as the minimum timescales:

- The site is being promoted by two parties. This creates challenges around how a planning application is progressed and the exercise of securing a housebuilder to purchase and deliver the site;
- Richborough Estates, who are promoting CS0087, is a strategic land promotor that would likely seek to secure an outline planning permission before looking to market the site, either in its entirety or in phases, to a housebuilder. This inevitably results in a delay in the delivery of homes on their portion of the site; and
- Likewise, MCC, who is promoting CS0251, is not a developer and will need to market the site to a secure best value, something that is inevitably going to extend the time it takes for delivery on site. Of the two sites under MCC's control that are allocated in the adopted LDP (Land at Crick Road, Portskewett and Land at Chepstow Road, Raglan), neither delivered units within the adopted LDP plan period; and

6.24. Based on the above analysis, Taylor Wimpey's view is that it will take longer than two years between the submission of a first planning application and first completion and, in reality, is likely to take somewhere between four and five years. With a planning submission realistically more likely to be made in the 2026/2027 period rather than the 2025/2026 period for the reasons set out above, it follows that first completion is unlikely to be before 2030/2031.

Assumed Delivery Rates

6.25. The other factor that influences how many homes a site is likely to deliver over the RLDP plan period is the rate of delivery after first completion which inherently determines how long it takes for a site to be built-out.

6.26. The Housing Trajectory suggests that the Land to the East of Caldicot/North of Portskewett site will be delivered at a rate of 75 homes per year in the first year, 125 homes per year for the next five years, and then 70 homes in the final nine months of the RLDP.

6.27. The ALDP Housing Delivery Table at Appendix E provides an overview of the delivery rates achieved for the ALDP strategic sites. It's probably of limited utility given that the size of the strategic sites allocated in the ALDP are so much lower than the Land to the East of Caldicot/North of Portskewett site, but the table points to an average delivery rate of 51.5 homes per annum across all sites and all years of delivery. All of these sites would have been delivered from a single outlet with the exception of Wonastow Road, Monmouth which was delivered from two outlets.

6.28. Due to its size, it is expected that the Land to the East of Caldicot/North of Portskewett site would be delivered from two outlets and in that sense, the Lichfields Paper is helpful in that it provides a mean and median delivery rate for sites at this scale. It found that sites between 1,000 and 1,499 homes (the category that the Land to the East of Caldicot/North of Portskewett East sits within and larger than the ALDP strategic sites) were delivered at a mean rate of 90 homes per annum and a median rate of 87 homes per annum[4]. These sites were presumably delivered from two outlets – a reflection that these figures are broadly double that from the ALDP sites.

6.29. From the above, it seems that a delivery rate of 125 homes per annum is unlikely to be achieved and that a delivery rate of circa 100 homes per annum is more realistic (though still possibly remains optimistic).

Conclusion

6.30. Taking the above together, Taylor Wimpey suggests that the Land to the East of Caldicot/North of Portskewett site will not be delivered at the rate that the Housing Trajectory suggests, both due to an underestimation of the time required for first completion but also an overestimation of assumed delivery rates after first completion.

6.31. On that basis, and as shown in the table below, it is suggested that the Land to the East of Caldicot/North of Portskewett site should be assumed to have capacity to deliver 375 homes over the RLDP plan period rather than 770 as the Housing Trajectory suggests at present.

[4] Even in the band above, the mean delivery rate would be 110 homes and the median 104 homes – both less than the 125 forecast in the Housing Trajectory.

Year	Stakeholder Group Housing Trajectory	Taylor Wimpey Suggested Housing Trajectory
2027/2028	75	0
2028/2029	125	0
2029/2030	125	0
2030/2031	125	100
2031/2032	125	100
2032/2033	125	100
2033 (Remainder)	70	75
Total in RLDP Plan Period	**770**	**375**

7. Question 14: Do you have any comments on the sustainable transport policies?

Policy ST5 – Transport Schemes

7.1. Policy ST5 (Transport Schemes) of the Deposit RLDP identifies a series of active travel, public transport, and road improvement schemes which are to be safeguarded from prejudicial development. The 'Severn Tunnel Junction Interchange improvements (rail and bus)' is identified as a public transport improvement scheme and the 'B2425/Severn Tunnel Junction Link Road' as a road scheme. The road element of this scheme would cross land under the control of Taylor Wimpey and therefore clearly, they are a significant stakeholder to the direction that the Deposit RLDP takes on this matter.

7.2. The B2425/Severn Tunnel Junction Link Road scheme was first introduced as part of the South East Wales Transport Commission's Report published in November 2020 to consider alternatives to the M4 Relief Road / Black Route which was abandoned in June 2019. As well as identifying an aspiration to deliver additional stations along the trainline from the Severn Tunnel and Cardiff, the Report specifically recommended the improvement of vehicular access to Severn Tunnel Junction Railway Station, encouraging MCC to work with Transport for Wales to deliver a bus-priority route from the M48. No plan was formally included as part of the Report, but it was clear from the description that it would bisect land controlled under Taylor Wimpey.

7.3. Building upon this, Welsh Government consulted on the 'Improving access to Severn Tunnel' Report in March 2022. This Report effectively sought feedback as to whether this route should connect run southwards to Severn Tunnel Junction Railway Station directly from the M48 or from the B4245. Taylor Wimpey supported the approach of delivering the link from the B4245 rather than from the M48. Whilst limited information was provided at that stage as part of the consultation, Taylor Wimpey confirmed the ability for its incorporation into their proposals for the Ifton Manor Farm site, committed to contributing to its funding (if required), and suggested that it was a more proportional response to the challenge with no evidence having been provided to demonstrate the need or benefits for a link for the M48. The consultation also presented an option where a park and ride facility and transport interchange was delivered to the north east of Severn Tunnel Junction Railway Station – something that was already incorporated into Taylor Wimpey's proposal for the site.

7.4. In February 2023, the Roads Review Panel published The Future of Road Investment in Wales (the Roads Review). As well as confirming agreement with Taylor Wimpey that the most appropriate option for the link road was from the B4245, in considering the Severn Tunnel Junction Railway Station link road, it commented on Page 304 that:

> *"The access road [to STJ] would pass through land between Rogiet to the west and Caldicot to the east designated as green wedge in Monmouthshire County Council's adopted Local Development Plan 2011-2021, and currently a candidate site for housing development. If development is approved, there would be opportunity for it to be public transport oriented due to the proximity to STJ Station, and this can happen regardless of whether the link road is constructed."*

7.5. The above is important – it shows clear recognition that growth delivered alongside the Severn Tunnel Junction Railway Station would be inherently public transport orientated, regardless of whether the link road is delivered.

7.6. There are three points that Taylor Wimpey wishes to make here:

7.7. Firstly, Taylor Wimpey supports the approach taken in the Deposit RLDP of supporting the option which links to Severn Junction Railway Station from the B4245 only and not from the M48. It aligns with Taylor Wimpey's preferred option as part of the 'Improving access to Severn Tunnel' consultation and reflects the finding of the Roads Review Panel's Report in February 2023. It is also a more proportional response to the intended aims and is something that Taylor Wimpey has committed to support the delivery of.

7.8. Secondly, and linked to the first point, the approach taken in the Deposit RLDP is a peculiar one. It supports the delivery of the road improvement and sets a requirement for it to be safeguarded but then fails to show this in any way on either the Proposals Map or the Constraints Map. It's not clear how an area of land can be safeguarded from development without it being spatially shown on a plan. It is suggested that an indicative location for this route should be shown as per Option 1 of the 'Improving access to Severn Tunnel' Report in March 2022, this being the last visual representation of the route's orientation. This aligns with the location of the link shown in the masterplanning work undertaken by Taylor Wimpey.

7.9. Thirdly, the Deposit RLDP does not respond to the opportunities that the delivery of the link road provides to Severnside. There are two points here:

- The 2023 Roads Review highlights the sustainability of new housing next to Severn Tunnel Junction Railway Station which the Deposit RLDP does not realise; and
- There is no recognition of the impact that a new link road will have on the local landscape, its suitability as a Green Wedge, or the settlement pattern in this location. Put another way, the Deposit RLDP fails to take an opportunity to deliver new housing in a highly sustainable location which has a changing landscape context.

8. Summary and Conclusion

8.1. This response to the Deposit Plan has been prepared by Savills on behalf of Taylor Wimpey PLC as the promoters (and ultimately developers) of the sites known as Land at Ifton Manor Farm, Caldicot.

8.2. The above Statement is structured to respond to the questions that are set out in the consultation response questions. They're addressed each in turn in the above but Taylor Wimpey's conclusion is that, at present, the Deposit RLDP is unsound. The reasons for this are as follows:

- The Growth Strategy it selects if not the best performing of the three growth strategies that were assessed as part of the Growth and Spatial Options Paper. This is crucial as clearly the Growth Strategy selected underpins all elements of the Deposit RLDP;
- A drastic and entirely unexplained shift is made in the spatial strategy for the Deposit RLDP since the Preferred Strategy to deliver additional housing in Monmouth, but with this shift entirely from the Severnside sub-region despite it being a tier 1 settlement in the settlement hierarchy;
- The Deposit RLDP supports the delivery and requires the safeguarding of a vehicular route across the land under Taylor Wimpey's control without actually identifying where it is to be located. It follows that a route cannot be safeguarded unless it is spatially defined;
- Despite supporting the delivery of the link road across it, the Deposit RLDP fails to consider the significantly urbanising effect that this will have in assessing the suitability of the parcel for designation as a Green Wedge. The conclusion that the parcel warrants designation as a Green Belt is therefore not evidenced;
- The Deposit RLDP seeks to allocate a single strategic site within the Severnside sub-region that performs quantitatively more poorly than the site that Taylor Wimpey is promoting within the same settlement; and
- Notwithstanding the above, an unrealistic delivery rate is assumed for the single strategic site identified in the Severnside sub-region such that an under delivery of homes across the RLDP plan period is inevitable.

Appendix A:
Response to the Preferred Strategy prepared on behalf of Taylor Wimpey PLC in relation to Ifton Manor Farm, Caldicot (CS0253 and CS0254)
January 2023

Monmouthshire County Council
Replacement Local Development Plan (2018-2033)
Preferred Strategy
Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **5th December 2022 to 30th January 2023.** All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

PART 1: Contact details

Your/ your Client's details		Agent's details* *(if relevant)*
Title:		[redacted]
Name:		[redacted]
Job title: *(where relevant)*		Associate
Organisation: *(where relevant)*	Taylor Wimpey PLC	Savills UK Ltd
Address:	c/o agent	[redacted]
Telephone no:	c/o agent	[redacted]
Email: *(if you have one)*	c/o agent	[redacted]

*Note if agent's details are included, all correspondence will be sent to the agent.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: http://www.monmouthshire.gov.uk/planning-policy/current-consultations

Office Use Only
Representor Number ……
Submission Type (email/web/letter etc) ……

PART 2: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help us to understand the issues you raise.

Key Issues, Vision and Objectives (Paras 3.1 - 4.3 / Pages 10- 24)

Do you have any comments on the key Issues, Vision and Objectives?

Taylor Wimpey PLC have no specific comments to make on the Issues, Vision and Objectives – reflecting their purpose, they are inevitably fairly generic and uncontentious in nature. That said, there is perhaps an opportunity in the Vision for specific reference to be made to ensuring that sufficient housing is delivered to meet both forecast requirements and to address the existing shortfall.

Taylor Wimpey PLC welcome that the Issues, Vision, and Objectives recognise that there is a limited supply of previously developed land (Paragraph 3.6), that all main towns are outside of the Future Wales Green Belt (Paragraph 3.9), and that it is not possible to avoid allocating land in the primary settlements that is best and most versatile land (Paragraph 3.7).

Preferred Strategy (Paras 4.4- 4.8 / Pages 25-27)

Do you have any comments on the Preferred Strategy?

Specific comments are made with regards to the level and distribution of growth in subsequent questions within this representation in response to questions relating to Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy).

Strategic Policies S1 – Growth Strategy (Paras 4.9- 4.26 / Pages 27-32)

Do you have any comments on Strategic Policy S1 – Growth Strategy

Strategic Policy S1 (Growth Strategy) of the Preferred Strategy sets out the housing and job / employment land requirement over the Replacement Local Development Plan (RLDP) plan period and inherently underpins other policies that will be contained within the RLDP. A requirement for 5,400 homes over the RLDP period is identified with a 10% buffer proposed to be applied on top of this meaning that the delivery of 5,940 homes is to be planned for. This is Growth Option 2 as presented in the Growth and Spatial Options Paper (September 2022).

This is a drastic divergence in approach to the June 2021 version of the Preferred Strategy which identified a requirement for 7,605 homes over the RLDP plan period and made provision for the delivery of 8,366 homes.

Taylor Wimpey PLC supported the approach taken in the June 2021 Preferred Strategy and continue to believe that it is the correct strategy to be taken for the RLDP. As a whole, the Growth and Spatial Options Paper (September 2022) identifies it as the best performing of the three Growth Options against the RLDP's objectives. The table below compares how Growth Option 1 performs against the other Growth Options set out in the Paper:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

Where Growth Option 1 does achieve "Amber" scores, the Paper notes that "the nature and significance of effects will be dependent on where growth is located and how development is designed / implemented". In other words, the impacts associated with the selection of Growth Option 1 can be mitigated through thorough ensuring the

correct sites are allocated and that the sites incorporate inherent mitigation.

On the basis of the above, Taylor Wimpey PLC would wholeheartedly support an approach that uses Growth Option 1.

It is understood that Welsh Government objected to the growth option that was selected for the June 2021 Preferred Strategy and that this has driven the selection of Growth Option 2 which performs less well against the RLDP's objectives than Growth Option 1. If Growth Option 2 is to be used for the RLDP, Taylor Wimpey PLC have three comments on the various components that underpin it.

Migration

The same assumptions are made with regards to UK based migration in the December 2022 Preferred Strategy as in the June 2021 Preferred Strategy. This assumes immigration rates from Bristol and South Gloucestershire based on the average over the last five years (2014/15-2019/20)and from neighbouring planning authorities over the previous 19 years (2001/02-2019/20).

Paragraph 2.15 of the Edge Analytics Updating the RLDP Demographic Evidence (November 2021) paper provides a useful comparison of how the Average Net Household Inflow Per Annum differs over the last 19 years to the last two years as replicated in the table below:

Location of Origin	Average Net Household Inflow Per Annum	
	2001/02–2019/20	2018/19-2019/20
North Somerset	15	30
Forest of Dean	27	57
Bristol	65	148
South Gloucestershire	92	177
Total	199	412

Two things are evident from this table.

- The level of net inflow per annum is greater in recent years than longer terms trends. Whilst the PG Long Term Adjustment of 5 years for Bristol and South Gloucestershire will pick up on some of this recent increase, it will also include the preceding three years where net inflows from these authorities were likely to be lower (although the Edge Analytics "Updating the RLDP Demographic Evidence" paper does not provide this information); and

- Whilst Bristol and South Gloucestershire are the two authorities where the level of immigration is greatest, there have been substantial increases in inflow from other authorities close to the border with Monmouthshire (most notable are the Forest of Dean and North Somerset). These levels are considerably higher in the last two years compared to the previous 19 year.

Taylor Wimpey PLC support the use of a scenario that makes adjustments for changes to migration but suggest that, rather than a PG Long Term Adjustment of 5 years (i.e. the projected level of inflow should be derived from rates over the previous five years), a PG Long Term Adjustment of 2 years (i.e. the projected level of inflow should be derived from rates over the previous two years) should be used instead and that this should be applied to all authorities rather than just Bristol and South Gloucestershire.

2018- Based Household Projections

Growth Option 2 proposes to use the "Principal Variation" of the 2018-based household projections. Whilst 2021-based household projections are likely to be published prior to the adoption of the RLDP, these are not presently available and the selection of the 2018-based projections at this stage is therefore appropriate albeit it is suggested that this is reviewed when the 2021-based projections are published.

The challenge is that the Principal Variation of the 2018-based household projections have already failed to provide an accurate forecast of the number of households within Monmouthshire. The table below compares the various 2018-based household projections with the 2021 Census.

Method	Households in Monmouthshire as of 2021
Principal 2018-Based Household Projection	40,755 (Forecast)
Higher Variant 2018-Based Household Projection	40,797 (Forecast)
2021 Census	40,900 (Actual)

From the above table, it is evident that the actual number of households within Monmouthshire (as per the 2021 Census) is considerably greater than both the Principal 2018-Based Household Projection and the Higher Variant 2018-Based Household Projection. The effect is that, even after just three years from the base date, the projections have under-projected the number of household by between 145 and 103 homes.

On that basis, it is suggested by Taylor Wimpey PLC that it would be inappropriate to make use of the Principal 2018-Based Household Projection as a starting point for calculating the RLDP's housing requirement and instead the Higher Variant must be used

Application of Flexibility Allowance

The Preferred Strategy proposed the application of a 10% buffer on top of the housing requirement – in essence 540 homes on top of the 5,400 home requirement so that the RLDP makes provision for 5,940 homes.

Footnote 23 of Paragraph 4.6 of the Preferred Strategy states that:

> *"In accordance with the Development Plans Manual (WG, March 2020) an allowance is provisionally made for a 10% flexibility allowance to factor in sites that may not come forward, unforeseen issues or to meet higher aspirations for the County to enable the provision/delivery of additional sites if all sites are delivered. The flexibility allowance will be given further consideration and refined at Deposit stage"*

This is an incorrect reading of the Development Plans Manual which, at Paragraph 5.59 states that:

> *"The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced."*

The 2022 Annual Monitoring Report, in its consideration of the adopted LDP performance at delivering Strategic Policy S2 (Housing Provision), states that:

> *"Ten years' worth of completions were recorded during the 2020-21 monitoring period, with the Plan delivering a shortfall of -1,500 units (33.3%) at that point when compared to the 10-year Plan requirement of 4,500 units."*

Despite the adopted LDP applying a 10% flexibility allowance in excess of the housing requirement, the latest Annual Monitoring Report, which now covers the entire adopted LDP plan period, demonstrates a substantial shortfall in housing delivery against requirement.

In addition, if MCC is to progress a strategic policy where 50% of units are required to be affordable than this is

clearly going to mean that the viability of a substantial number of sites which are being promoted by the private sector become more marginal and more suspectable to changes to the buoyancy of the housing market and cost of materials – overall, the effect being that it is more likely that sites become unviable throughout the whole RLDP plan period.

On this basis, there is a clear justification that is robustly evidenced for the incorporation of a higher flexibility allowance that is considerably higher than the 10% figure that is suggested as a starting point in the Development Plans Manual as a starting point and it is therefore suggested that there is a robust justification for the incorporation of a 25% flexibility allowance on top of housing requirement.

Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.27 - 4.35 / Pages 33 - 40)

Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?

Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) effectively does three things:

1) Sets out a settlement hierarchy for the distribution of housing to be delivered across the RLDP period;

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period; and

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Comments are made on point in turn below:

1) Sets out a spatial hierarchy for the distribution of housing to be delivered across the RLDP period;

Caldicot (which also includes the wider Severnside region) is identified in Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) of the Preferred Strategy as one of four Primary Settlements alongside Abergavenny, Chepstow, and Monmouth at the top tier of the settlement hierarchy.

Taylor Wimpey PLC welcome the upgrading of the status of Caldicot when compared to the adopted LDP and the 2021 Preferred Strategy. This is something that Taylor Wimpey PLC suggested as part of the consultation on the 2021 Preferred Strategy and such an approach reflects the settlement's performance in the Sustainable Settlement Appraisal (December 2022) and the intention of the Preferred Strategy to make significant allocations within the settlement.

2) Indicates how much new housing is to be delivered in each tier of the settlement hierarchy across the RLDP period;

Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) of the Preferred Strategy indicates that 44% of the housing requirement identified in Strategic Policy S1 (Growth Strategy) is to be delivered in the Severnside.

Reflecting that Caldicot is specifically identified as a Primary Settlement rather than there being a separate tier relating to the Severnside Region more generally, it should be the case that the vast majority of new growth to be delivered within the Severnside Region should be directed to Caldicot. This is the correct approach and reflects that Caldicot is both identified in the Sustainable Settlement Appraisal (December 2022) as the most sustainable location within the Severnside Region and also delivered very little growth in the adopted LDP plan period, supporting no new housing allocations. A common sense point, but the clear advantage of the Ifton Manor Farm

(Site A) being promoted by Taylor Wimpey PLC is that it effectively sits between two settlements such that it is able to make use of the services and connections of both.

The next most sustainable settlement as identified in the Sustainable Settlement Appraisal (December 2022) is Magor Undy where there remains undeveloped allocations in the adopted LDP at Rockfield Farm which will deliver throughout the RLDP plan period. The other Severnside settlements, Caerwent, Crick, Portskewett, and Sudbrook, all perform significantly worse than Caldicot in the Sustainable Settlement Appraisal (December 2022) and, if they are to accommodate new housing, the amount should be modest. Alternatively, these settlements could be redistributed amongst the other tiers of the settlement hierarchy.

The Preferred Strategy provides a comprehensive overview of the challenges relating to water quality as a result of phosphates within watercourses. Whilst solutions may be deliverable elsewhere across Monmouthshire, the Preferred Strategy suggests that this is unlikely to be the case for the Upper Wye Catchment. The approach of including any undeveloped allocated sites or sites which benefit from planning permission within Monmouth's settlement boundary but considering them as "bonus sites" rather than as either existing commitments or as windfall allowances seems sensible and is supported by Taylor Wimpey PLC.

3) Identifies at Table 2 the various mechanisms of delivery that will make up the new housing that is to be delivered by each tier of the settlement hierarchy.

Included in the section relating to Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) is Table 2 which provides a summary of the various components for each settlement that will deliver the requirement set out in Strategic Policy S1 (Growth Strategy). Whilst clearly the "Completions 2018-2021" component is a fixed position that reflects previously completed, Taylor Wimpey PLC have comments on other components of Table 2.

Existing Commitments

Table 2 identifies that a total of 1,261 homes are to be delivered through Existing Commitments, these being sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement. From this list, the Housing Background Paper (December 2022) removes three sites which officers do not expect to come forward.

The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey PLC. There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed. The approach taken in the Strategic Options Paper (November 2021) prepared by Cardiff Council applied a 20% discount on Existing Commitments and it is considered that such a discount should be applied as a minimum.

On this basis, it is suggested that the "Existing Commitments" component should be reduced by 20% from 1,261 to 1,009.

Total Allowances (Small Sites; Windfalls)

The "Total Allowances" is broken down further in the Housing Background Paper (December 2022) into "Windfall

Sites" and an "Allowance for Small Sites".

With regards to the calculation of "Windfall Sites", Taylor Wimpey PLC welcome that an assumption has not been made on the basis of previous average delivery rates given that this will have been distorted by permissions under the unallocated sites policy. The preparation of the Housing Potential Study as detailed in Appendix 3 of the Housing Background Paper (December 2022) is a sensible method for forecasting delivery on windfall sites. That said, there can be no certainty that all 14 identified sites will be delivered or that they will deliver the number of homes that they are expected to in the Housing Potential Study, particularly given that only four are under the ownership of MCC. Given the lack of certainty with regards to the delivery of these sites, it is suggested that a substantial discount, perhaps of as much as 50% should be applied.

The calculation for the "Allowance for Small Sites" is based on the average delivery of such sites over the previous 10 years, adjusted to remove any sites delivered in the Upper River Wye Catchment Area (because they could not be delivered due to the phosphate issue) and to include a 20% discount in Rural Areas. There are two points to be made here:

- Whilst acknowledging that the delivery of Small Sites in rural areas will be more challenging in the RLDP (hence the 20% reduction), it is not clear why such a reduction is not applied to other tiers of the settlement hierarchy where, much like the Rural Areas, the number of units that will be delivered will likely be less as the easier opportunities have been delivered. In many ways, Table 7 of the Housing Background Paper (December 2022) already shows this with the level of small site completions being 45 compared against a ten year average of 82. It is suggested that such a discount need to be applied to the allowance for all tiers of the hierarchy; and

- No allowance is made for the demolition of existing homes which will inevitably be required to deliver windfall sites as, for example, a single property is demolished to provide the land required for a greater number of homes. Such an approach has been taken by Cardiff Council which had been calculating demolitions over the LDP period (which it is understood that MCCC may not have done) and this equated to 10% of units to be delivered via windfall. It is therefore suggested that a discount of 10% is applied for the loss of existing housing stock.

Taylor Wimpey PLC therefore suggest that Table 2 needs to be amended so that 609 homes are assumed to be delivered as Total Allowances (Small Sites; Windfalls) – 105 on Windfall Sites and 504 as an Allowance for Small Sites.

Allocations

Taking the above together, even if no change is made to the housing requirement set out in Strategic Policy S1 (Growth Strategy), the above analysis suggests that there is a requirement for an additional 543 homes to be allocated than forecast in Table 2.

If the settlement hierarchy and distribution set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) is continued, this suggests that the figure set out in Table 2 for the quantum of homes to be delivered through new allocations in Caldicot should be increased proportionately from 1,200 to 1,439 homes (i.e. 44% of 543 homes).

Taking the above together, even if no change is made to the housing requirement set out in Strategic Policy S1 (Growth Strategy), there is a requirement for an additional 543 homes to be allocated than forecast in Table 2.

Strategic Policy S7 – Preferred Strategic Site Allocations
(Please State which Preferred Strategic Site Allocation you are commenting on)
(Paras 5.32 - 5.36 / Pages 56- 59)

Do you have any comments on the Preferred Strategic Site Allocations?

Strategic Policy S7 (Preferred Strategic Site Allocations) - Caldicot East (CS0087 and CS0251)

The Preferred Strategy identifies the "Caldicot East" site as a Preferred Strategic Site Allocation with capacity to deliver 1,460 homes in total of which 925 will be within the RLDP plan period. Taylor Wimpey PLC is promoting the Ifton Manor Farm (Site CS0253) site and a separation representation is made with regards to the suitability of the Ifton Manor Farm site when compared to Caldicot East (as well as other sites being promoted within Severnside).

Nevertheless, if MCC is to allocate Caldicot East, and for reasons set out in the separation representation, this is considered inappropriate (and is discussed in more detail in the Candidate Site representation, Taylor Wimpey PLC suggests that it is unrealistic to expect the site to deliver 925 homes over the RLDP plan period. No housing trajectory has been provided and neither has evidence has any reasoning as to how this figure has been arrived at and will be achieved.

Included at Appendix 1 is a paper entitled "Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites?" prepared by Lichfields which examines the timescales associated with the delivery of large strategic housing sites. For sites between 1,000 and 1,500 homes the paper found that it typically takes 6.9 years from the submission of the first planning application to the first completion of a home. This is split into 4.6 years to secure planning permission and a further 2.3 years from securing planning permission to completing the first home on site.

This should be seen as a minimum for the following reasons:

- Richborough Estates, who are promoting CS0087, is a strategic land promotor that would likely seek to secure an outline planning permission before looking to market the site, either in its entirety or in phases, to a housebuilder. This inevitably results in a delay in the delivery of homes on the site;

- Likewise, MCC, who is promoting CS0251, is not a developer and will need to market the site to a secure best value, something that is inevitably going to extend the time it takes for delivery on site. Of the two sites under MCC's control that are allocated in the adopted LDP (Land at Crick Road, Portskewett and Land at Chepstow Road, Raglan), neither have delivered any units in the adopted LDP plan period; and

- There are likely to be substantial upfront infrastructure costs associated with the delivery of this site which could include the creation of a new access from the M48 and the creation of new active travel and public transport links into Caldicot.

Following first completion, the Lichfields Report found that sites of between 1,000 and 1,500 homes were found to

deliver homes at a rate of 107 homes per year – i.e. circa 50 units a year from two outputs.

If the timescales set in the Delivery Agreement are kept to, and an application submitted when the RLDP reaches Deposit stage in Q1 2024, this would mean that the first completion would not be until 2031. On the basis of the above average annual delivery rate, this would suggest that the Caldicot East site is likely to only deliver for three years of the RLDP period and at a rate of 107 homes. On that basis, it would seem incorrect to assume that the Caldicot East site can deliver any more than 350 homes over the RLDP plan period.

Other Strategic Policies (Please State which Strategic Policy you are commenting on) (Paras 5.1-5.123 / Pages 41-98)

Do you have any comments on the Strategic policies?

Strategic Policy S6 (Affordable Housing)

Taylor Wimpey PLC have provided comments in connection to Strategic Policy S1 (Growth Strategy) suggesting that the housing requirement for the RLDP should be higher than currently planned for in the Preferred Strategy. This in turn would result in an increase in the affordable homes target.

Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on) (Appendix 7 Pages 136-147

Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?

Policy LC6 (Green Wedges)

The expectation that Green Wedges will be reviewed as part of the preparation of the RLDP is supported by Taylor Wimpey PLC. In undertaking this review, it should be noted that the Landscape Sensitivity Study Update produced by White Consultants (October 2020) identified CS0253 Ifton Manor Farm (Site A) as having a lower landscape sensitivity for change when compared to other sites surrounding Caldicot which are being promoted for development including the Caldicot East site which is shown as a Preferred Strategic Site Allocation. A Landscape and Visual Impact Assessment prepared by EDP was submitted as part of the Stage 2 Call for Sites and provided further commentary on this matter.

Any other Comments

Do you have any other comments on the Preferred Strategy?

Welsh Language

We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Initial Integrated Sustainability Appraisal (separate document)

Do you have any comments on the Initial Integrated Sustainability Appraisal Report?

Comments are provided by DTA in the form of a Transport Note at Appendix 2 with regards to the Integrated Sustainability Appraisal Report.

Habitats Regulations Assessment (separate document)

Do you have any comments on the Habitats Regulations Assessment?

To assist with the efficient processing of responses we would encourage you to submit your comments via email to: planningpolicy@monmouthshire.gov.uk. If this is not possible completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 30th January 2023**.

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. ☐

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. ☐

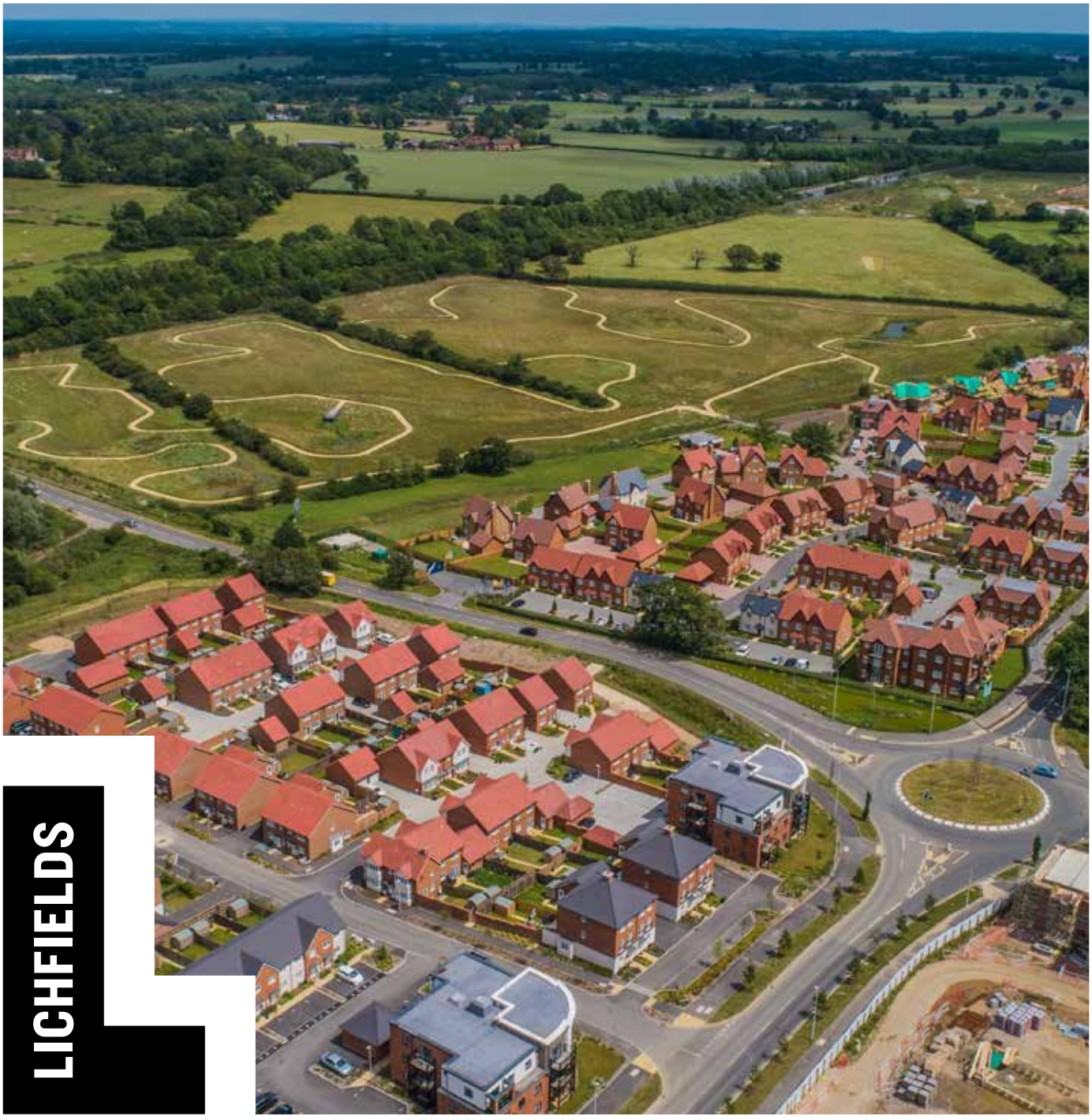
Appendix 1 - Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites (Lichfields: February 2020)

INSIGHT
FEBRUARY 2020

Start to Finish

What factors affect the build-out rates of large scale housing sites?

SECOND EDITION



LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 50 years.

lichfields.uk



Executive summary

Lichfields published the first edition of Start to Finish in November 2016. In undertaking the research, our purpose was to help inform the production of realistic housing trajectories for plan making and decision taking. The empirical evidence we produced has informed numerous local plan examinations, S.78 inquiries and five-year land supply position statements.

Meanwhile, planning for housing has continued to evolve: with a revised NPPF and PPG; the Housing Delivery Test and Homes England upscaling resources to support implementation of large sites. Net housing completions are also at 240,000 dwellings per annum. With this in mind, it is timely to refresh and revisit the evidence on the speed and rate of delivery of large scale housing sites, now looking at 97 sites over 500 dwellings. We consider a wide range of factors which might affect lead-in times and build-out rates and have drawn four key conclusions.

In too many local plans and five-year land supply cases, there is insufficient evidence for how large sites are treated in housing trajectories. Our research seeks to fill the gap by providing some benchmark figures - which can be of some assistance where there is limited or no local evidence - but the averages derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site.

We have drawn four key conclusions:

1 Large schemes can take 5+ years to start

Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post recession

Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors.

3 Large greenfield sites deliver quicker

Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.

Key figures

180 sites assessed, with combined yield of 213k+ dwellings; 97 sites had 500+ homes

c.3yrs average time taken from outline decision notice to first dwelling completions on sites of 500+ homes

8.4yrs the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwellings

160 dpa the average annual build-out rate for a scheme of 2,000+ dwellings (median: 137)

68 dpa the average annual build rate of a scheme of 500-999 dwellings (median: 73)

+34% higher average annual build-out rate on greenfield sites compared with brownfield sites

61 dpa average completions per outlet on sites with one outlet, dropping to 51 for sites of two outlets, and 45 for sites with three outlets

01
Introduction

This is the second edition of our review on the speed of delivery on large-scale housing development sites. The first edition was published in November 2016 and has provided the sector with an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

Over this period, housing delivery has remained at or near the top, of the domestic political agenda: the publication of the Housing White Paper, the new NPPF, an emboldened Homes England, a raft of consultations on measures intended to improve the effectiveness of the planning system and speed up delivery of housing. Of particular relevance to *Start to Finish* was the completion of Sir Oliver Letwin's independent review of build out ("the Letwin Review"), the inclusion within the revised NPPF of a tighter definition of 'deliverable' for the purposes of five-year housing land supply (5YHLS) assessment, and the new Housing Delivery Test which provides a backward looking measure of performance. The policy aim is to focus more attention on how to accelerate the rate of housing build out, in the context of the NPPF (para 72) message that the delivery of a large numbers of new homes can often be best achieved through larger scale development such as new settlements or significant extensions to existing villages and towns, but that these need a realistic assessment of build-out rates and lead in times of large-scale development.

This second edition of *Start to Finish* is our response to the latest policy emphasis. It provides the planning sector with real-world benchmarks to help assess the realism of housing trajectory assumptions, particularly for locations where there have been few contemporary examples of strategic-scale development. The first edition looked in detail at how the size of the site affected build-out rates and lead in times, as well as other factors such as the value of the land and whether land was greenfield or brownfield. We have updated these findings, as well as considering additional issues such as how the affordability of an area and the number of outlets on a site impacts on annual build-out rates.

We have also expanded the sample size (with an extra 27 large sites, taking our total to 97 large sites, equivalent to over 195,000 dwellings) and updated with more recent data to the latest monitoring year (all data was obtained at or before the 1st April 2019).



Our research complements, rather than supplants, the analysis undertaken by Sir Oliver Letwin in his Review. The most important differentiation is that we focus exclusively on what has been built, whereas each of the sites in the Letwin Review included forecasts of future delivery. Additionally, the Letwin Review looked at 15 sites of 1,500+ homes, of which many (including the three largest) were in London. By contrast, the examples in this research sample include 46 examples of sites over 1,500 homes across England and Wales, the majority of which are currently active. As with the first edition of our research, we have excluded London because of the distinct market and delivery factors in the capital.

Contents

01	**Introduction**	1
02	**Methodology**	2
03	**Timing is everything**	5
04	**How quickly do sites build out?**	9
05	**What factors influence build-out rates?**	14
06	**Conclusions**	18

180
sites

97
large sites of 500 units or more

27
additional sites compared with our 2016 research

8
sites also included in Sir Oliver Letwin's review

02 Methodology

The evidence presented in this report analyses how large-scale housing sites emerge through the planning system, how quickly they build out, and identifies the factors which lead to faster or slower rates of delivery.

We look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the various stages of development have been codified. Figure 1 sets out the stages and the milestones used, which remain unchanged from the first edition of this research. The overall 'lead-in time' covers stages associated with gaining an allocation, going through the 'planning approval period' and 'planning to delivery period', finishing when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time. The annualised build-out rates are also recorded for the development up until the latest year where data was available at April 2019 (2017/18 in most cases). Detailed definitions of each of these stages can be found in Appendix 1. Not every site assessed will necessarily have gone through each component of the identified stages as many of the sites we considered had not delivered all dwellings permitted at the time of assessment, some have not delivered any dwellings.

Information on the process of securing a development plan allocation (often the most significant step in the planning process for large-scale schemes, and which – due to the nature of the local plan process - can take decades) is not easy to obtain on a consistent basis across all examples, so is not a significant focus of our analysis. Therefore, for the purposes of this research the lead-in time reflects the start of the planning approval period up to the first housing completion.

The 'planning approval period' measures the validation date of the first planning application on the site (usually an outline application but sometimes hybrid), to the decision date of the first detailed application to permit dwellings in the scheme (either full, hybrid or reserved matters applications). It is worth noting that planning applications are typically preceded by significant amounts of pre-application engagement and work, plus the timescale of the local plan process.

The 'planning to delivery' period follows immediately after the planning approval period and measures the period from the approval of the first detailed application to permit development of dwellings and the completion of the first dwelling.

Development and data

Whilst our analysis focuses on larger sites, we have also considered data from the smaller sites for comparison and to identify trends. The geographic distribution of the 97 large sites and comparator small sites is shown in Figure 2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to secure a range of locations and site sizes in the sample, but there is no way of ensuring it is representative of the housing market in England and Wales as a whole, and thus our conclusions may not be applicable in all areas or on all sites. In augmenting our sample with 27 additional large sites, new to this edition of our research, we sought to include examples in the Letwin Review that were outside of London, only excluding them

Box I: Letwin Review sites

1. Arborfield Green (also known as Arborfield Garrison), Wokingham
2. Ledsham Garden Village, Cheshire West & Chester
3. Great Kneighton (also known as Clay Farm), Cambridge (included in the first edition of this research)
4. Trumpington Meadows, Cambridge
5. Graven Hill, Cherwell
6. South West Bicester, Cherwell
7. Great Western Park, South Oxfordshire
8. Ebbsfleet, Gravesham and Dartford (included in the first edition of this research)

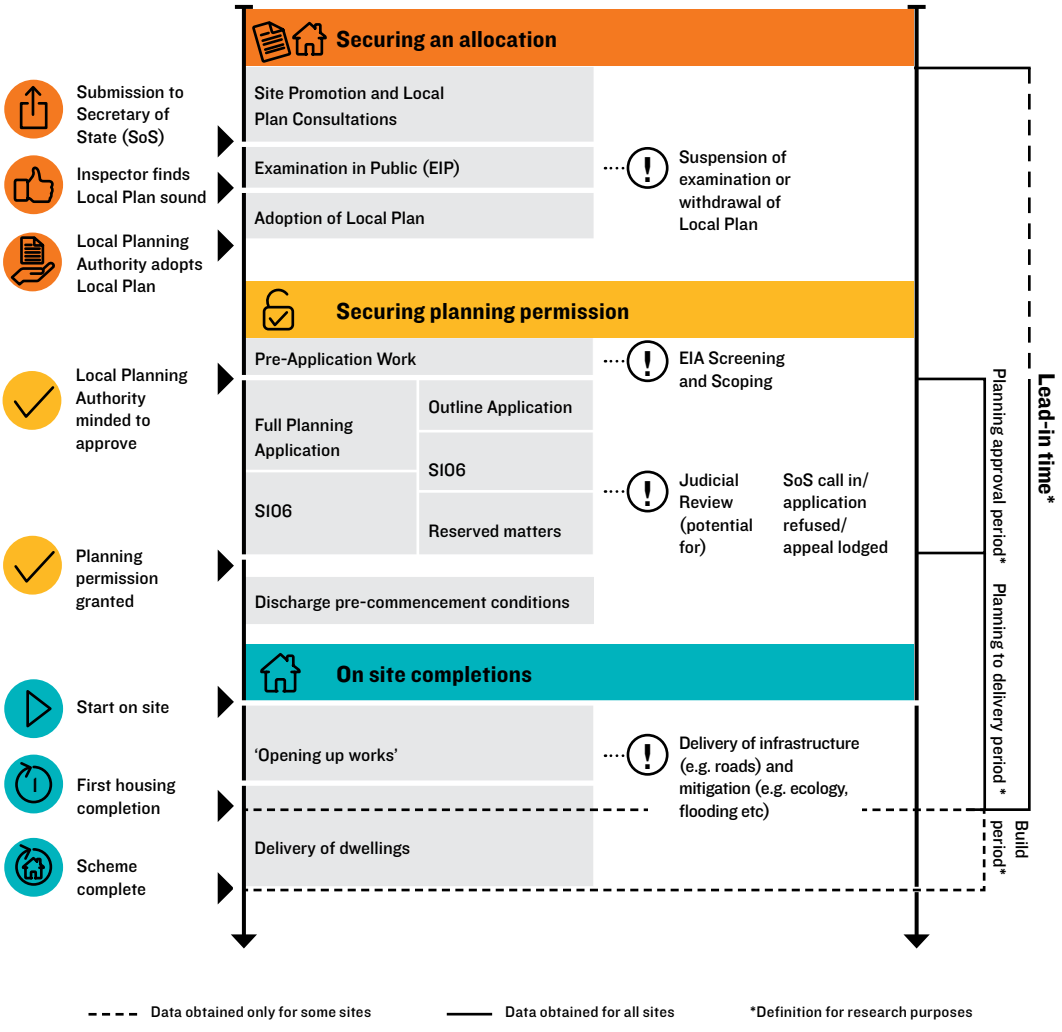
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

In most instances, we were unable to secure the precise completion figures for these sites that matched those cited in the Letwin Review. Sources for data Lichfields has obtained on completions for those sites that also appear in the Letwin Review are included at the end of Appendix 2.

The sources on which we have relied to secure delivery data on the relevant sites include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents[1] produced by local authorities;
2. By contacting the relevant local planning authority, and in some instances the relevant County Council, to confirm the data or receive the most up to date figures from monitoring officers or planners; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



Source: Lichfields analysis

[1] Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

units on large sites of 500 or more homes

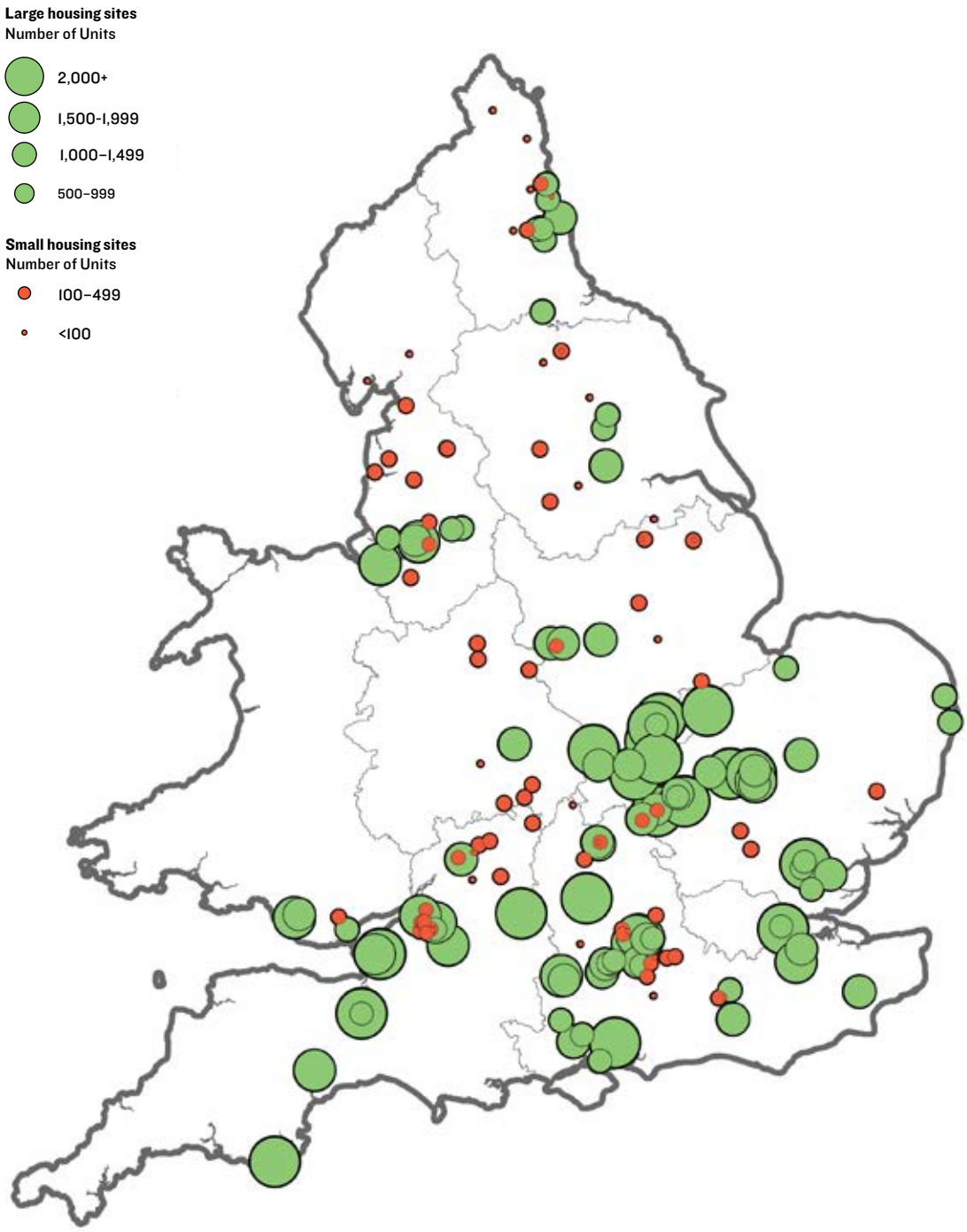
16,467

units on small sites under 500 homes

35

sites of 2,000 homes or more

Figure 2: Map of site sample by size of site (total dwellings)



Source: Lichfields analysis

03
Timing is everything: how long does it take to get started?

In this section we look at lead in times, the time it takes for large sites to get the necessary planning approvals. Firstly, the changing context of what 'deliverable' means for development. Secondly, the 'planning approval period' (the time it takes for large sites to get the necessary planning approvals). And thirdly, the 'planning to delivery period' (the time from approval of the first detailed application to permit development of dwellings to the completion of the first dwelling).

The new definition of 'Deliverable'

The question of how quickly and how much housing a site can begin delivering once it has planning permission, or an allocation, has become more relevant since the publication of the new NPPF with its new definition of deliverable. Only sites which match the deliverability criteria (i.e. suitable now, available now and achievable with a realistic prospect that housing will be delivered on the site within five years) can be included in a calculation of a 5YHLS by a local authority. This definition was tightened in the revised NPPF which states that:

"sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years". (emphasis added)

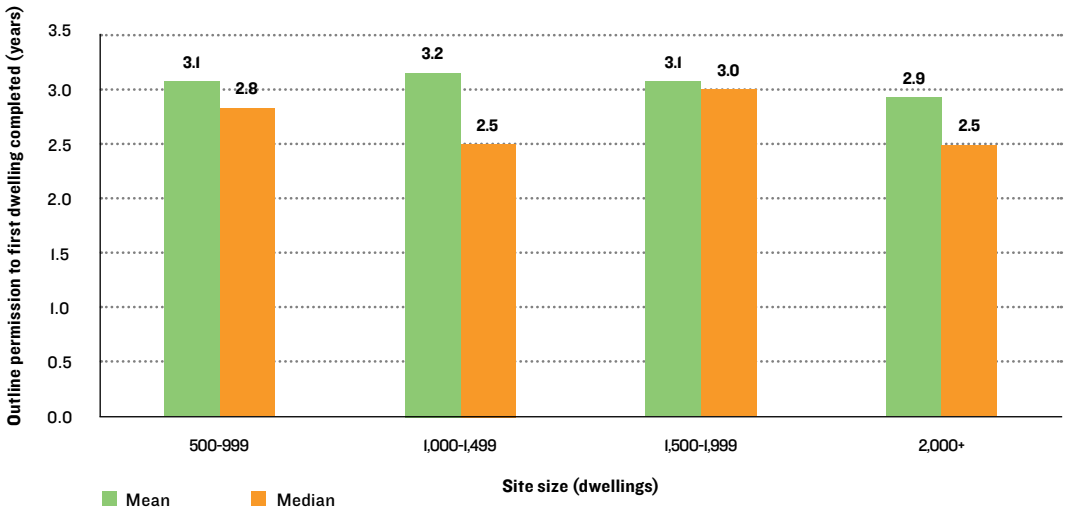
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance[2] and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about site viability, ownership constraints or infrastructure provision. In this context, it is relevant to look at how long it takes, on average, for a strategic housing site to progress from obtaining outline permission to delivering the first home (or how long it takes to obtain the first reserved matters approval, discharge pre-commencement conditions and open up the site), and then how much housing could be realistically expected to be completed in that same five-year period.

Based on our sample of large sites, the research shows that, upon granting of outline permission, the time taken to achieve the first dwelling is – on average c.3 years, regardless of site size. After this period an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4). Outline planning permissions for strategic development are not

c.3 years

average time from obtaining outline permission to first dwelling completion on sites of 500+ homes

Figure 3: Average time taken from gaining outline permission to completion of the first dwelling on site (years), compared to site size



Source: Lichfeilds analysis

[2] Planning Practice Guidance Reference ID: 68-007-20190722

Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period.

always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development[3]. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

Figure 4 considers the average timescales for delivery of the first dwelling from the validation of an outline planning application. This demonstrates that only sites comprising fewer than 499 dwellings are – on average - likely to deliver anything within an immediate five year period. The average time from validation of an outline application[4] to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five-year period for land supply calculations.

Comparison with our 2016 findings

Planning Approval Period

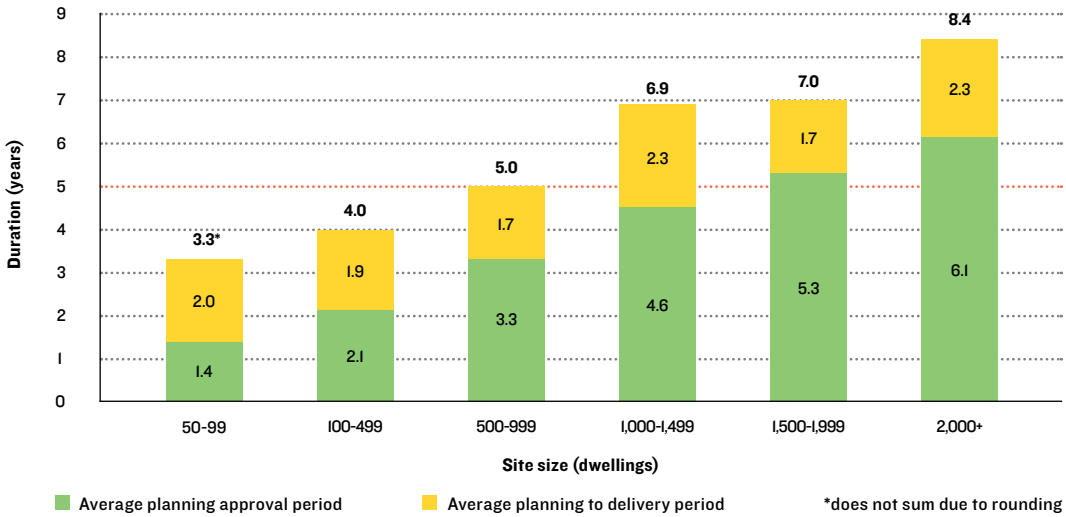
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant variations within this average, with some sites progressing very slowly or quickly compared to the other examples. This is unsurprising as planning circumstances will vary between places and over time.

Table 1: Average planning approval period by size of site (years)

Site Size	1st edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

[3] Realising Potential - our research for the Land Promoters and Developers Federation in 2017 - found that 41% of homes with outline planning permission were promoted by specialist land promoter and development companies, compared to 32% for volume house builders.

[4] The planning approval period could also include a hybrid or full application, but on the basis of our examples this only impacts a small number of sites

Planning to Delivery Period

Although there is little difference between the average planning approval periods identified in this research compared to our first edition findings, the average lead-in time after securing planning permission is higher (Figure 5). It is this period during which pre-commencement planning conditions have to be discharged as well as other technical approvals and associated commercial agreements put in place.

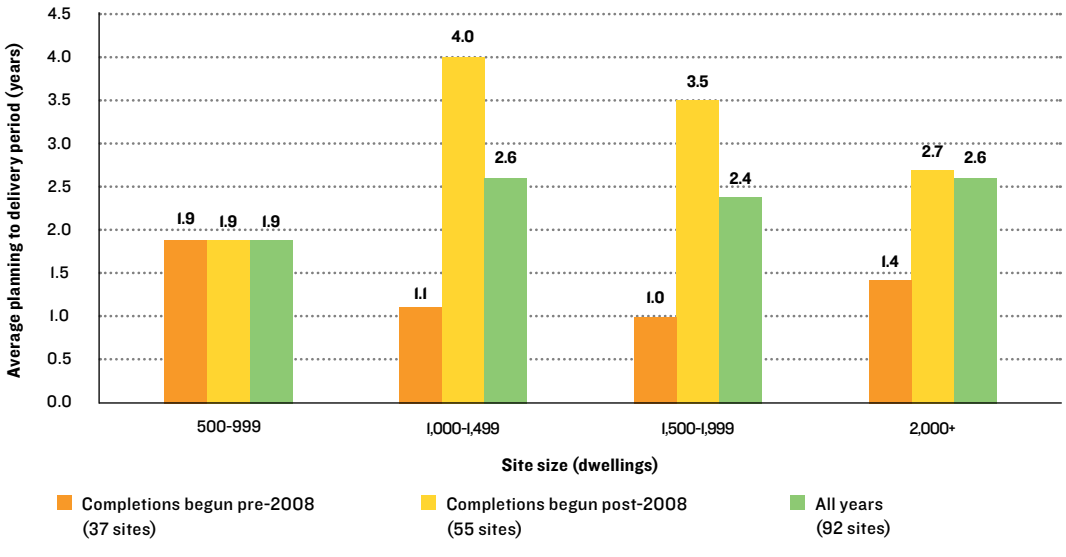
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 8 of these sites had not delivered their first home but have subsequently). This implies that the introduction of more recent examples into the research, including existing examples which have now commenced delivery[5], has seen the average for planning to delivery periods lengthening.

A similar trend is apparent considering the 55 sites that delivered their first completions after 2007/08. These have significantly longer planning to delivery periods than those where completions began prior to the recession. The precise reasons are not clear, but is perhaps to be expected given the slowdown in housing delivery during the recession, and the significant reductions in local authority planning resources which are necessary to support discharge of pre-commencement conditions. However, delays may lie outside the planning system; for example, delays in securing necessary technical approvals from other bodies and agencies, or market conditions.



Sites that delivered their first completion during or after the 2007/08 recession have significantly longer planning to delivery periods than sites which began before.

Figure 5: Planning to delivery period, total average, pre and post-2008



Source: Lichfeilds analysis

Figure 5: Five of the large sites examples do not have a first dwelling completion recorded in this research

[5] Priors Hall has been amended since the first edition based on more recent data

In demand: how quickly do high pressure areas determine strategic applications for housing?

Using industry-standard affordability ratios, we found that areas with the least affordable places to purchase a home (i.e. the highest affordability ratios) tended to have longer planning to delivery times than areas that were more affordable. This is shown in Figure 6, which splits the large site sample into national affordability quartiles, with the national average equating to 8.72.

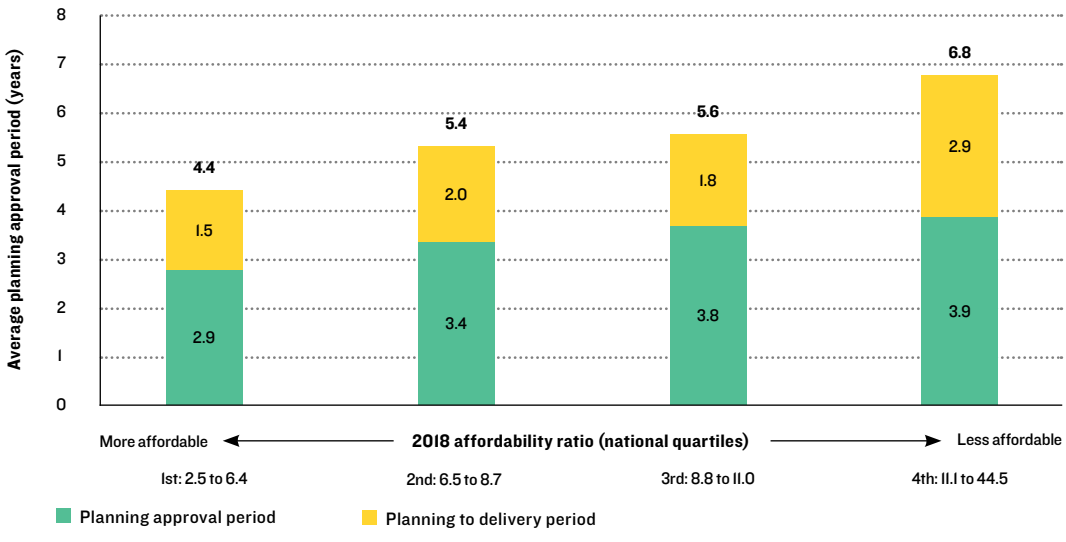
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable LPAs (with the greatest gap between workplace earnings and house prices) have examples of large schemes with an average site size of 2,000+ dwellings. It may be that the more affordable markets do not support the scale of up-front infrastructure investment that is required for larger-scale developments and which lead to longer periods before new homes can be built. However, looking at the other three quartiles, the analysis does also suggest that planning and implementation becomes more challenging in less affordable locations.

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 – 6.4	1,149
6.5 – 8.7	2,215
8.8 – 11.0	2,170
11.1 – 44.5	2,079

Source: Lichfields analysis

Figure 6: Planning approval period (years) by 2018 affordability ratio



Source: Lichfields analysis

04
How quickly do sites build out?

The rate at which new homes are built on sites is still one of the most contested matters at local plan examinations and planning inquiries which address 5YHLS and housing supply trajectories. The first edition of this research provided a range of 'real world' examples to illustrate what a typical large-scale site delivers annually. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year (the top five annual figures were between 419-620 dwellings per annum), this rate of delivery was not always sustained. Indeed, for schemes of 2,000 or more dwellings the average annual completion rate across the delivery period was 160 dwellings per annum.

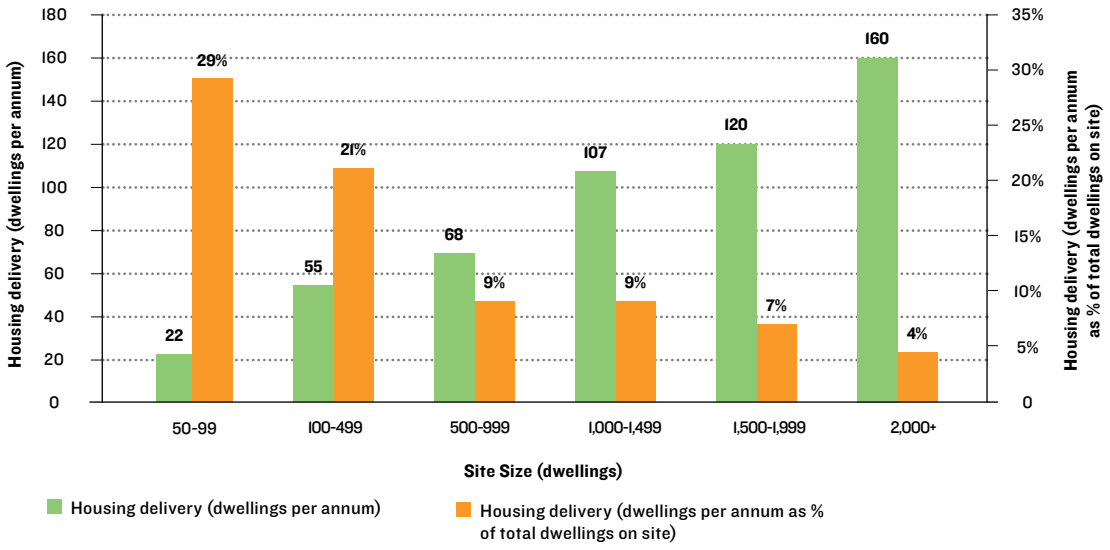
Average Annual Build-out rates

Figure 7 presents our updated results, with our additional 27 sites and the latest data for all sites considered. The analysis compares the size of site to its average annual build-out rate. Perhaps unsurprisingly, larger sites deliver on average more dwellings per year than smaller sites. The largest sites in our sample of over 2,000 dwellings, delivered on average more than twice as many dwellings per year than sites of 500-999 dwellings, which in turn delivered an average of three times as many units as sites of 1-99 units. To ensure the build-out rates averages are not unduly skewed, our analysis excludes any sites which have only just started delivering and have less than three years of data. This is because it is highly unlikely that the first annual completion figure would actually cover a whole monitoring year, and as such could distort the average when compared to only one other full year of delivery data.

160 dpa

the average annual build rate for schemes of 2,000+ dwellings

Figure 7: Build-out rate by size of site (dpa)



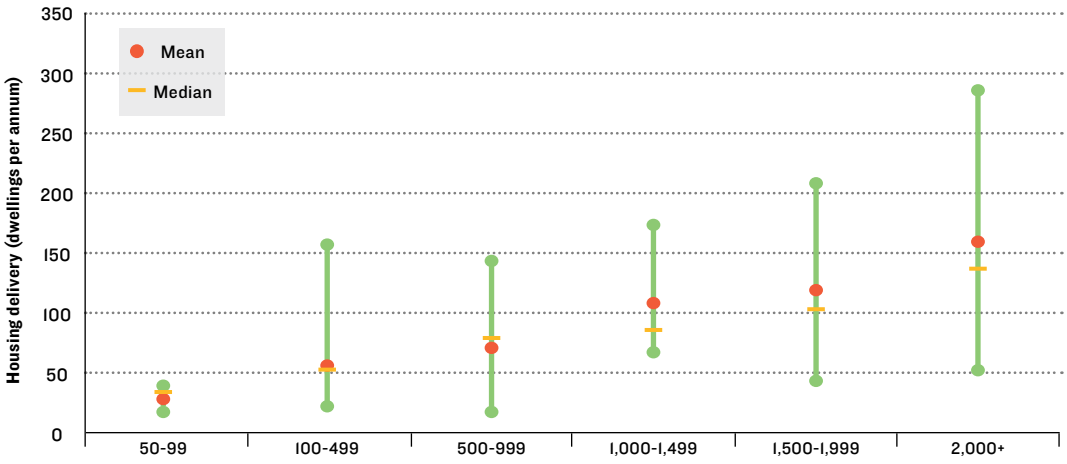
Source: Lichfields analysis

In most cases the median annual delivery rate is lower than the mean for larger sites.

We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

Our use of averages refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown in Figure 8; this reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or 'mid-point scheme'.

Figure 8: Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields analysis

Table 3: Median and mean delivery rates by site size

Site Size	Number of sites	Median housing delivery (dwellings per annum)	Median delivery as % of total on site	Mean annual delivery (dwellings per annum)	Mean annual delivery as % of total units on site
50-99	29	27	33%	22	29%
100-499	54	54	24%	55	21%
500-999	24	73	9%	68	9%
1,000-1,499	17	88	8%	107	9%
1,500-1,999	9	104	7%	120	7%
2,000+	27	137	4%	160	4%

Source: Lichfields analysis

Comparison with our 2016 findings

Comparing these findings to those in the first edition of this research, there is very little difference between the averages observed (median was not presented) for different site sizes, as set out below. The largest difference is a decrease in average annual build-out rates for sites of 1,000-1,499 dwellings, but even then, this is only a reduction of 10 dpa or 9%.

As with the first edition of the research, these are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Figure 8 shows the divergence from the average for different site size categories. This shows that whilst the average for the largest sites is 160 dpa and the median equivalent 137 dpa, the highest site average was 286 dpa and the lowest site average was 50 dpa for sites of 2,000+ dwellings. This shows the need for care in interpreting the findings of the research, there may well be specific factors that mean a specific site will build faster or slower than the average. We explore some of the factors later in this report.

Variations for individual schemes can be marked. For example, the 2,605 unit scheme South of the M4 in Wokingham delivered 419 homes in 2017/18, but this was more than double the completions in 2016/17 (174) and the average over all six years of delivery so far was just 147 dwellings per annum.

Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently delivery 300 dpa.



Site build-out rates for individual years are highly variable. For example, one scheme in Wokingham delivered more than twice as many homes in 2017/18 as it did in the year before.

Table 4: Mean delivery rates by site sizes, a comparison with first edition findings

Site size (dwellings)	2016 edition research (dpa)	2020 edition research (dpa)	Difference
50-99	27	22	-5 (-19%)
100-499	60	55	-5 (-8%)
500-999	70	68	-2 (-3%)
1,000-1,499	117	107	-10 (-9%)
1,500-1,999	129	120	-9 (-7%)
2,000+	161	160	-1 (-0.62%)

Source: Lichfields analysis

Table 5: Peak annual build-out rates compared against average annual delivery rates on those sites

Site	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne, South Cambridgeshire	4,343	620	223
Oakley Vale, Corby	3,100	520	180
Eastern Expansion Area, Milton Keynes	4,000	473	268
Clay Farm, Cambridge	2,169	467	260
South of M4, Wokingham	2,605	419	147
Cranbrook, East Devon	2,900	419	286

Source: Lichfields analysis

Table 5: Please note The Hamptons was included as an example of peak annual delivery in the first edition with one year reaching 520 completions. However, evidence for this figure is no longer available and as it was not possible to corroborate the figure it has been removed. The analysis has been updated to reflect the latest monitoring data from Peterborough City Council.

Longer term trends

This section considers the average build-out rates of sites which have been delivering over a long period of time. This is useful in terms of planning for housing trajectories in local plans when such trajectories may span an economic cycle.

In theory, sites of more than 2,000 dwellings will have the longest delivery periods. Therefore, to test long term averages we have calculated an average build-out rate for sites of 2,000+ dwellings that have ten years or more of completions data available.

For these sites, the average annual build-out rate is slightly higher than the average of all sites of that size (i.e. including those only part way through build out), at 165 dwellings per annum[6]. The median for these sites was also 165 dwellings per annum.

This indicates that higher rates of annual housing delivery on sites of this size are more likely to occur between years five and ten, i.e. after these sites have had time to 'ramp up'.

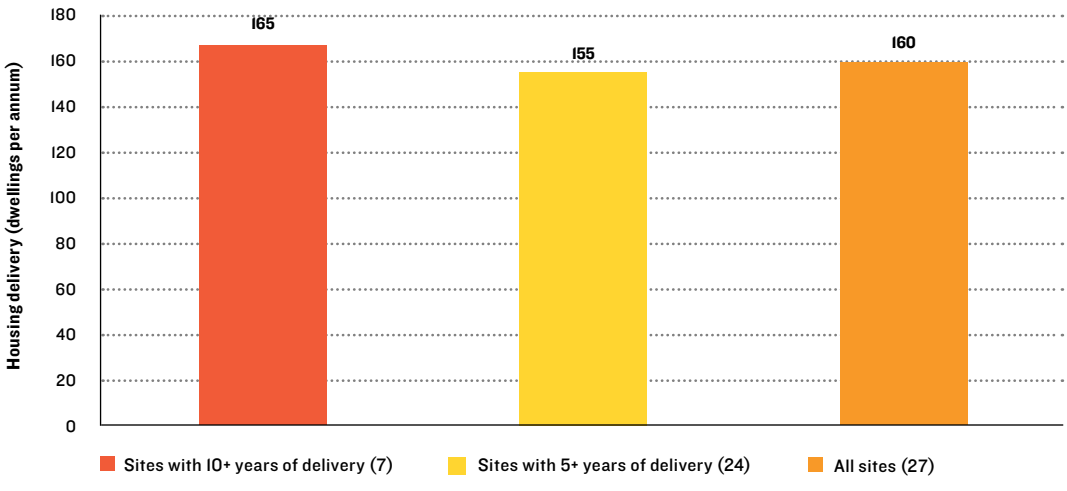
It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

It is also helpful to consider the impact of market conditions on the build-out rate of large scale housing sites. Figure 10 overleaf shows the average delivery rate of sites of 2,000 or more dwellings in five-year tranches back to 1995/96. This shows that although annual build-out rates have improved slightly since the first half of the 2010's, they remain 37% below the rates of the early 2000's. The reasons for the difference are not clear and are worthy of further exploration – there could be wider market, industry structure, financial, planning or other factors at play.

In using evidence on rates of delivery for current/historic schemes, some planning authorities have suggested that one should adjust for the fact that rates of build out may have been affected by the impact of the recession. We have therefore considered how the average rates change with and without including the period of economic downturn (2008/09 – 2012/13). This is shown in Table 6 and it reveals that average build-out rates are only slightly depressed when one includes this period, but may not have fully recovered to their pre-recession peaks. We know that whilst the recession – with the crunch on mortgage

Figure 9: Average build-out rate for sites over 2,000 homes by length of delivery period (dpa)



Source: Lichfields analysis

[6] This is based on the completions of seven examples, Chapelford Urban Village, Broadlands, Kings Hill, Oakley Vale, Cambourne, The Hamptons and Wixhams

availability – did have a big impact and led to the flow of new sites slowing, there were mechanisms put in place to help sustain the build out of existing sites.

However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.

Table 6: Impact of recession on build-out rates

	Build-out rates in all years		Build-out rates excluding recession years (2008/9-2012/13)		Build-out rates pre-recession	
	Average rate	Sample size	Average rate	Sample size	Average rate	Sample size
All large sites 500+	115	77	126	68	130	21
All large sites 2,000+	160	27	171	25	242	6
Greenfield sites 2,000+	181	14	198	12	257	3

Source: Lichfields analysis

Figure 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

05
What factors can influence build-out rates?

+34%

higher average annual build-out rates on greenfield land compared with brownfield

Having established some broad averages and how these have changed over time, we turn now to look at what factors might influence the speed at which individual sites build out. How does housing demand influence site build out? What is the impact of affordable housing? Does it matter whether the site is greenfield or brownfield? What about location and site configuration?

In demand: do homes get delivered faster in high pressure areas?

One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied.

This analysis considers whether demand for housing at the local authority level affects delivery rates by using (industry-standard) affordability ratios. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Figure 11 shows the sample of 500+ unit schemes divided into those where the local authority in which they are located is above or below the national median affordability ratio (8.72) for sites which have delivered for three years or more. This analysis shows that sites in areas of higher demand (i.e. less affordable) deliver on average more dwellings per annum.

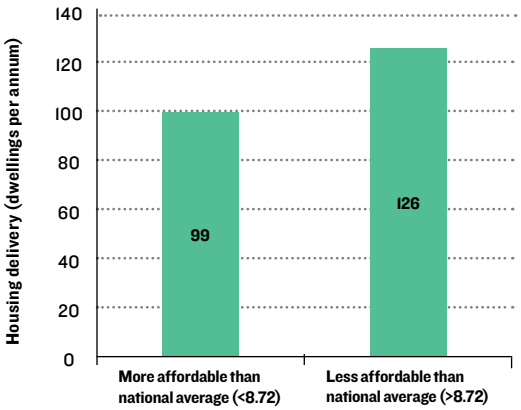
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability is greater than the national average, average site size is 2,145 dwellings. So, it is possible that the size of site – rather than affordability *per se* – is a factor here.

Do sites on greenfield land deliver more quickly?

The first edition of this research showed that greenfield sites on average delivered quicker than their brownfield counterparts. In our updated analysis this remains the case; large greenfield sites in our sample built out a third faster than large brownfield sites.

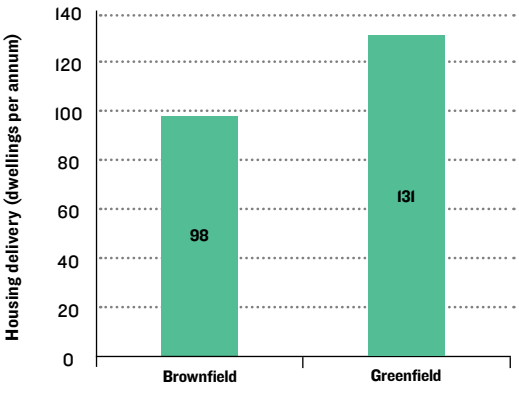
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure 11: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)



Source: Lichfields analysis

Figure 12: Build-out rates on brownfield and greenfield sites (dpa)



Source: Lichfields analysis

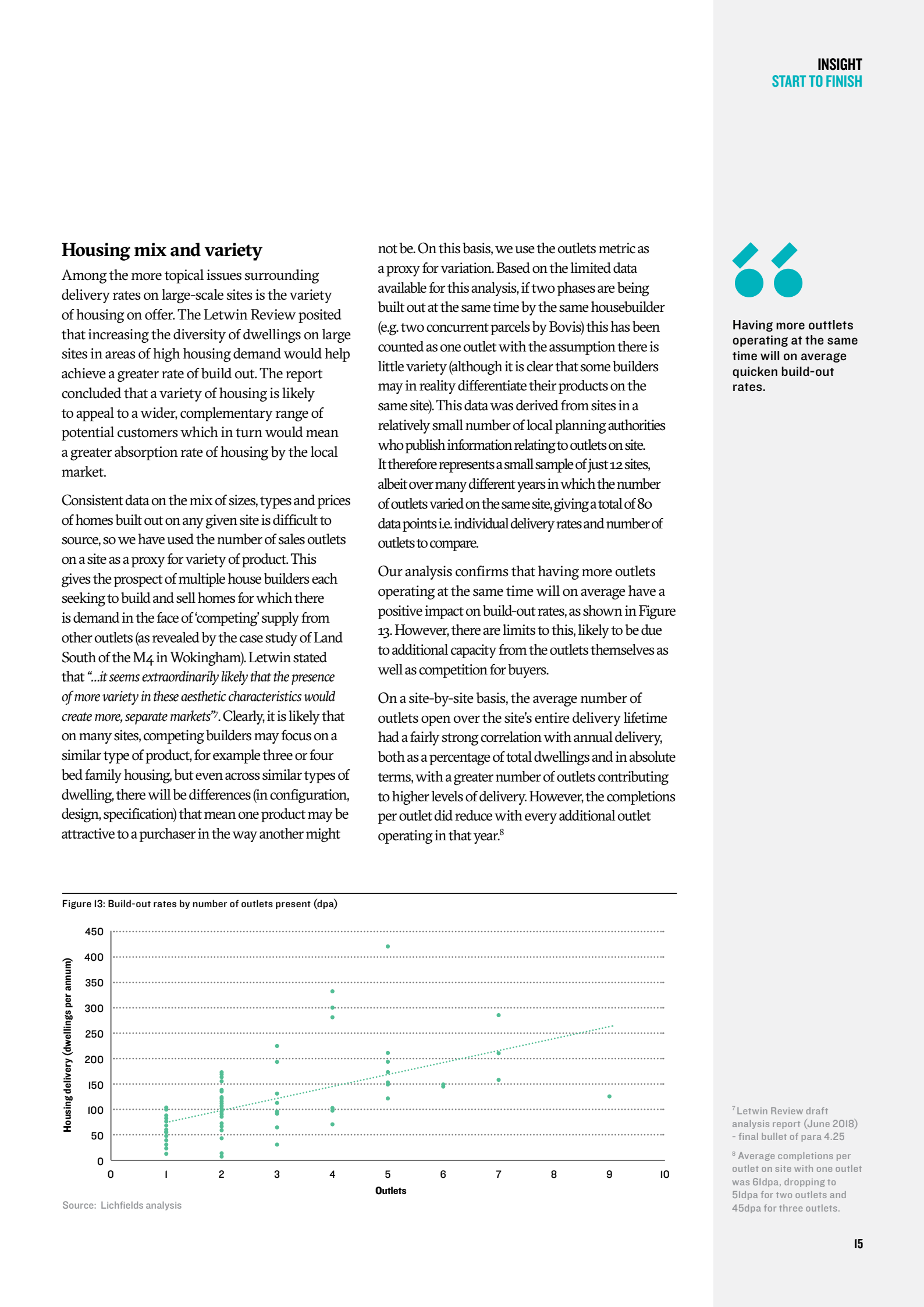
Housing mix and variety

Among the more topical issues surrounding delivery rates on large-scale sites is the variety of housing on offer. The Letwin Review posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build out. The report concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that *"...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets"*[7]. Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might not be. On this basis, we use the outlets metric as a proxy for variation. Based on the limited data available for this analysis, if two phases are being built out at the same time by the same housebuilder (e.g. two concurrent parcels by Bovis) this has been counted as one outlet with the assumption there is little variety (although it is clear that some builders may in reality differentiate their products on the same site). This data was derived from sites in a relatively small number of local planning authorities who publish information relating to outlets on site. It therefore represents a small sample of just 12 sites, albeit over many different years in which the number of outlets varied on the same site, giving a total of 80 data points i.e. individual delivery rates and number of outlets to compare.

Our analysis confirms that having more outlets operating at the same time will on average have a positive impact on build-out rates, as shown in Figure 13. However, there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers.

On a site-by-site basis, the average number of outlets open over the site's entire delivery lifetime had a fairly strong correlation with annual delivery, both as a percentage of total dwellings and in absolute terms, with a greater number of outlets contributing to higher levels of delivery. However, the completions per outlet did reduce with every additional outlet operating in that year.[8]



Having more outtlets operating at the same time will on average quicken build-out rates.

Figure 13: Build-out rates by number of outlets present (dpa)

Source: Lichfields analysis

[7] Letwin Review draft analysis report (June 2018) - final bullet of para 4.25

[8] Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

An under-explored aspect of large-scale site delivery is the physical opportunity on site. For example, some schemes lend themselves to simultaneous build out of phases which can have the impact of boosting delivery rates in that year, for example, by having access points from two alternative ends of the site. Other sites may be reliant on one key piece of infrastructure which make this opportunity less likely or impractical. In the first edition of this research we touched on this point in relation to Eastern Expansion Area (Broughton Gate & Brooklands) of Milton Keynes. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research as serviced parcels with the roads already provided were delivered as part of the Milton Keynes delivery model. Multiple house builders were able to proceed straight onto the site and commence delivery on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. In this second edition of this research the Milton Keynes examples remain some of the sites with the highest annual build-out rates.

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SP1	Bellway (1)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (1)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_1	Bloor, Bovis and Linden (3)	169
SP10	Darcliffe Homes (-)	None - parcel completed
SP11	Taylor Wimpey (1)	4

Source: Lichfields analysis

Figure 14: Map of parcels at Land South of M4, Wokingham



Source: © Google Earth 2020/ Wokingham Local Plan

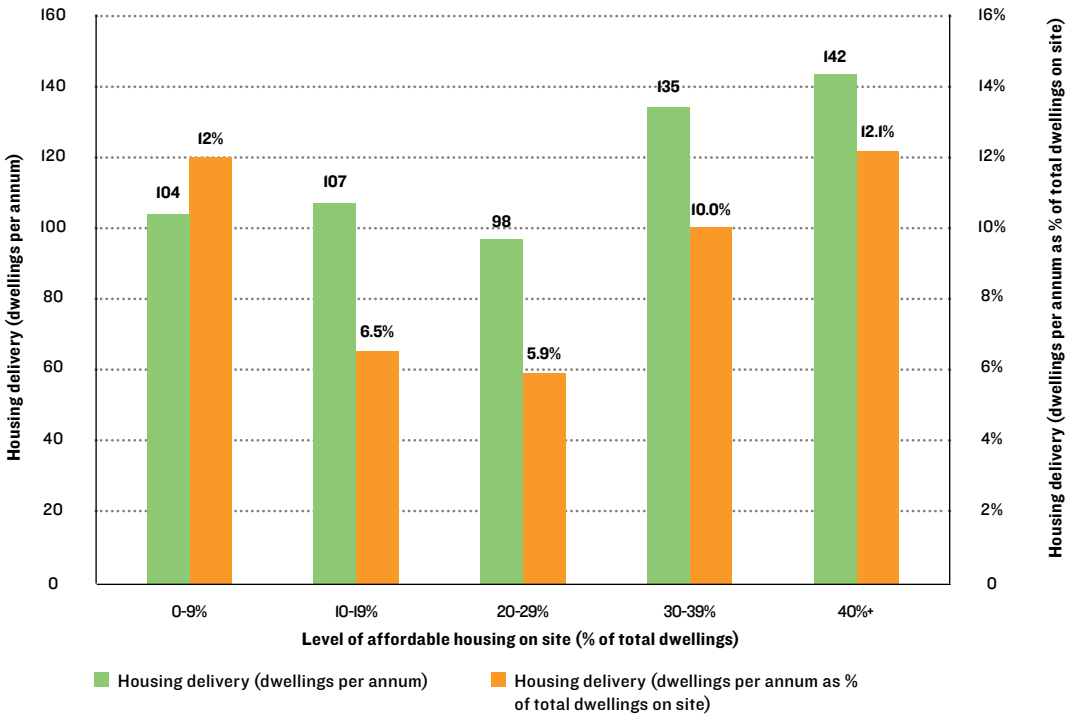
In this edition we look at the case study of Land South of the M4 in Wokingham. In 2017/18 the site achieved a significant 419 completions. Using the local authority's granular recording of delivery on the site to date, we have been able to consider where these completions were coming forward from within the wider 2,605 dwelling scheme. As shown in Figure 14, in that year new homes were completed on five separate parcels with completions ranging from 4 to 169 dwellings. On some of these parcels (SP9_1 and SP4) there were two or three separate housebuilders building out, and in total on the site there were seven different house building companies active (the impact of multiple outlets on build-out rates is explored later in this report). The parcels are located in separate parts of the site and each had their own road frontages and access arrangements which meant they are able to come forward in parallel. This can enable an increased build rate.

Affordable choices: do different tenures provide more demand?

Our findings on tenure, another form of 'variety' in terms of house building products, are informed by data that is available on about half the sites in our large site sample. From this the analysis shows schemes with more affordable housing built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all dwellings on site. However this is not always the case. Schemes with 20-29% affordable housing had the lowest build-out rates, both in terms of dwellings and proportionate to their size.

Schemes with more affordable housing built out at close to twice the rates as those with lower levels.

Figure 15: Build-out rates by level of affordable housing (dpa and percentage)



Source: Lichfields analysis

06
Conclusions

Recent changes to national planning policy emphasise the importance of having a realistic expectation of delivery on large-scale housing sites, whilst local authorities now find themselves subject to both forward and backward-looking housing delivery performance measures. A number of local plans have hit troubles because they over-estimated the yield from some of their proposed allocations. Meanwhile, it is no longer sufficient for a 5YHLS to look good on paper; the Housing Delivery Test means there are consequences if it fails to convert into homes built.

To ensure local authorities are prepared for these tests, plan making and the work involved in maintaining housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets. For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories. This research seeks to fill the gap with some benchmark figures - which can be of some assistance where there is limited or no local evidence. But the average derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different. Therefore, whilst the averages observed in this research may be a good starting point, there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the three-tier analytical framework at Figure 16.

Key findings:

1 Large schemes can take 5+ years to start

In developing a local plan, but especially in calculating a 5YHLS position, it is important to factor in a realistic planning approval period dependent on the size of the site. Our research shows that if a scheme of more than 500 dwellings has an outline permission, then the average time to deliver its first home is two or three years. However, from the date at which an outline application is validated it can be 5.0 - 8.4 years for the first home to be delivered dependent on the size of the site. In these circumstances, such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post-recession

Whilst attention and evidence gathering is often focused on how long it takes to get planning permission, the planning to delivery period from gaining permission to building the first house has also been increasing. Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors including the recession and reductions in local authority planning resources.

3 Large greenfield sites deliver quicker

Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longer-term sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites. Furthermore, large scale greenfield sites deliver at a quicker rate than their brownfield equivalents: the average rate of build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land. In most locations, a good mix of types of site will therefore be required.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build out rates, although there is not a linear relationship. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site, but those with 20-29% had the lowest rates of all. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand).

Figure I6: Key questions for assessing large site build-out rates and delivery timelines

Planning Approval

- Is the site already allocated for development? If it is in an emerging Plan, does it need to be adopted before the site can be brought forward?
- Is an SPD, masterplan or development brief required and will it help resolve key planning issues?
- Is there an extant planning permission or live planning application submitted?
- If outline permission is granted, when will reserved matters be submitted?
- Is the proposal of the promoter consistent with local policy and/or SPD/Masterplan?
- Are there significant objections to the proposal from local residents?
- Are there material objections to the proposal from statutory bodies?
- If planning permission is secured, is reserved matters approval required?

Lead In

- Does the scheme have pre-commencement conditions?
- Is the land in existing use?
- Has the land been fully assembled?
- Are there any known technical constraints that need to be resolved?
- If in multiple ownership/control, are the interests of all parties aligned?
- Is there up-front infrastructure required before new homes can be built?
- Has the viability of the proposal been established and is the feasibility consistent with known infrastructure costs and the likely rate of development?
- Does the proposal rely on access to public resources and what evidence is there on when those will be available?
- Is the scheme led by a promoter or master developer who will need to dispose of phases to a house builder before completions begin?

Build Out

- How large is the site?
- How strong is the local market?
- Does the site tap into local demand from one or more existing neighbourhoods?
- Will delivery be affected by competing sites?
- How many sales outlets will be supported by the scale, configuration and delivery model for the site?
- What is the track record of the promoter/master developer in delivery of comparable sites?
- How active are different housebuilders in the local market?
- What proportion of affordable housing is being delivered?
- Are there policy requirements for a specific mix of housing types and are there other forms of housing – such as build to rent?
- When will new infrastructure – such as schools – be provided to support the new community?
- Are there trigger points or phasing issues that may affect the build-out rate achievable in different phases?

Appendices

Contents

Appendix 1: Definitions and notes 22
Appendix 2: Large sites tables and sources for sites also found in the Letwin Review 23
Appendix 3: Small sites tables 28

Appendix 1: Definitions and notes

The 'lead in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time does also include the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

Includes the discharge of any pre-commencement and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the 'first housing completion'

On site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMR's) and other planning evidence base documents produced by local authorities (see footnote 1), contacting the local planning authority monitoring officers or planners and in a handful of instances obtaining the information from housebuilders.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the age of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for the vast majority of sites. And because not all of the sites assessed have commenced housing delivery, build-out rate information is not universal. The results are presented accordingly.

Appendix 2: Large sites tables

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Ebbsfleet	Gravesham/ Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312													
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	
Rugby Radio Station	Rugby	6,200	N/A																						
East of Kettering	Kettering	5,500	2016/17	43	93																				
Sherford	Plymouth	5,500	2016/17	7	106																				
Priors Hall	Corby	5,200	2011/12	56	21	59	87	170	155	273															
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	60	57													
Monkton Heathfield	Taunton Deane	4,500	2012/13	22	76	220	191	222	148																
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47												
Cambourne	South Cambridgeshire	4,343	1999/2000	42	361	213	337	620	151	377	267	219	190	162	206	154	151	129	239	201	95	126			
Eastern Expansion Area (Broughton Gate & Brooklands)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138																
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86															
Stanton Cross	Wellingborough	3,650	N/A																						
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262																			
Northampton North SUE	Daventry	3,500	2017/18	50																					
Great Western Park	South Oxfordshire	3,300	2011/12	110	204	232	392	237	274	78															
Oakley Vale	Corby	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	96	103	51	40	9	70					
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31
North West Cambridge	Cambridge and South Cambridgeshire	3,000	2016/17	73																					
West of Waterloo	Havant and Winchester	3,000	2009/10	38	71	30	82	112	135	196	241														
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	93														
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419																
Winterstoke Village	North Somerset	2,550	2014/15	132	185	242	161																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	197	318	280																		

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Land East Icknield Way	Test Valley	2,500	2009/10	184	257	103	181	135	229	146	184														
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118																	
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154														
Broadlands	Bridgend	2,309	1999/2000	288	331	307	193	204	156	64	104	91	28	81	50	147	11								
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45															
Arborfield Garrison	Wokingham	2,225	2016/17	57	114																				
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168														
Clay Farm/ Showground Site (Great Kneighton)	Cambridge	2,169	2012/13	16	265	399	153	467																	
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90																				
Graven Hill	Cherwell	1,900	2016/17	1	28																				
Elvetham Heath	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6													
Hunts Grove	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22														
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96	
Red Lodge	Forest Heath	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111								
South West Bicester (Phase 1 Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86									
Parc Derwen	Bridgend	1,500	2010/11	8	103	134	201	199	197	157	186														
Jennet's Park	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28											
Melton Road	Rushcliffe	1,500	2016/17	40	126																				
Great Denham	Bedford	1,450	data only avalibale from 2009/10	92	150	159	71	122	150	125	211	168													
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85													
South Maldon Garden Suburb	Malden	1,428	2017/18	1																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Bolnore Village	Mid Sussex	1,358	2012/13	30	54	88	73	36	124																
Park Prewett Hospital	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16			
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90									
Oxley Park (East & West)	Milton Keynes	1,300	2004/05	52	166	295	202	115	91	75	163														
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24														
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101										
Staynor Hall	Selby	1,200	2005/06	12	141	115	10	43	62	46	59	79	162	79	34	50									
Picket Twenty	Test Valley	1,200	2011/12	147	178	180	176	164	145	175															
Trumpington Meadows	Cambridge and South Cambridgeshire	1,200	2012/13	141	143	67	100	94																	
Broughton (Broughton & Atterbury)	Milton Keynes	1,200	2003/04	114	105	170	409	204	180	18															
Orchard Park	Cambridge	1,120	2006/07	100	290	148	103	95	56	34	15	75	39	30	2										
Velmead Farm	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4									
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15																					
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116																		
Highfields Farm	South Derbyshire	1,056	2016/17	141	204																				
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122																	
Northampton North of Whitehills SUE	Daventry	1,000	2016/17	108	100																				
Taylors Farm/Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12									
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	96																
Little Staniton	Corby	970	2009/10	106	116	74	121	102	93	89	86	26													
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60												
Ingress Park	Dartford	950	2002/03	184		275	100	74	0	119	0	0													
Nar Ouse Millenium Commuity	Kings Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0											
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42								
South Bradwell	Great Yarmouth	850	2015/16	60.3	60.3	60.3																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22
				Dwellings per annum																					
Prospect Place	Cardiff	826	2007/08	185	48	0	0	0	0	0	76	170													
Abbotswood	Test Valley	800	2011/12	30	190	157	114	152	90	20															
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30												
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																
Hungate	York	720	2009/10	90	52	11	9	7			187	8													
Northside	Gateshead	718	1999/2000	46.8	46.8	46.8	46.8	46.8	56	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43					
Land at West Blyth	Northumbeland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90												
Rowner Renewal Project	Gosport	700	2010/11	4	100	70	45	89	101	79	97														
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110																			
The Parks, formally Staff College	Bracknell Forest	697	2006/07	-94	104	88	101	54	47	72	59	94	78												
Staiths South Bank	Gateshead	667	2003/04	24	58		44		48																
Land south of Wansbeck General Hospital	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54									
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5																		
Ochre Yards	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2			46	4	52	2										
Former Runwell Hospital	Chelmsford	575	2016/17	91	90																				
Land adjoining Manchester Ship Canal	Trafford	550	N/A																						
Pamona Docks	Trafford	546	N/A																						
Thingwall Lane	Knowlsey	525	2013/14	79																					
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	14	13	18	15								
University Campus Chelmsford	Chelmsford	507	2014/15	216	3																				
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																	
Land West of Copthorne	Mid Sussex	500	N/A																						

Sources for sites also found in the Letwin Review

Arborfield Green (Arborfield Garrison)		Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/
Ledsham Garden Village		Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/
Great Kneighton (Clay Farm)		Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports
Trumpington Meadows		Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries) https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/
Graven Hill		Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
South West Bicester (Kingsmere Phase I)		Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
Great Western Park		Housing Land Supply Statement April 2018 http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf
Ebbsfleet:		First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13
	2009-10:	127 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf
	2010-11:	79 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf
	2011-12:	55 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf
	2012-13:	50 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf
	2013/14:	87 dwellings, based on total completions form Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.
	2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/

Appendix 3: Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Horfield Estate Phase I	Bristol City Council	485
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery	Wigan	471
Farington Park, east of Wheelton Lane	South Ribble	468
Bleach Green	Gateshead	456
Kingsmead South	Milton Keynes Council	450
New Central	Woking Borough Council	445
Land at former Battle Hospital	Reading Borough Council	434
New World House	Warrington	426
Radyr Sidings	Cardiff	421
Luneside West	Lancaster	403
Woolley Edge Park	Wakefield	375
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365
Former NCB Workshops (Portland Park)	Northumberland	357
Chatham Street Car Park Complex	Reading	307
Kennet Island Phase I - H, M, T, UI, U2	Reading	303
Land at Dorian Road	Bristol, City of	300
Land at Fire Service College, London Road	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Long Marston Storage Depot Phase I	Stratford-on-Avon	284
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273
Land at Canons Marsh	Bristol, City of	272
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417	Cotswold	270
Hortham Hospital	South Gloucestershire	270

Site Name	Local Planning Authority	Size
GCHQ Oakley - Phase I	Cheltenham	262
Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hoval Ltd North Gate	Newark and Sherwood	196
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Sellars Farm	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176
Queen Mary School	Fylde	169
London Road/ Adj. St Francis Close	East Hertfordshire	149
Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
North of Douglas Road	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	130
Land to the rear of Mount Pleasant	Cheshire West and Chester	127
Primrose Mill Site	Ribble Valley	126
Kennet Island Phase 1B - E, F, O & Q	Reading	125
Land between Godsey Lane and Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Land west of Birchwood Road	Bristol, City of	119
Former Bewbush Leisure Centre Site	Crawley	112
Land south of Station Road	East Hertfordshire	111
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96
North East Sandylands	South Lakeland	94

Site Name	Local Planning Authority	Size
Auction Mart	South Lakeland	94
Parcel 4 Gloucester Business Park	Tewkesbury	94
York Road	Hambleton	93
Land At Green Road - Reading College	Reading	93
Caistor Road	West Lindsey	89
The Kylins	Northumberland	88
North East Area Professional Centre, Furnace Drive	Crawley	76
Land at Willoughbys Bank	Northumberland	76
Watermead, Land At Kennel Lane	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site)	West Lindsey	69
Land off Crown Lane	Wychavon	68
Former Wensleydale School	Northumberland	68
Land at Lintham Drive	South Gloucestershire	68
Springfield Road	South Kesteven	67
Land off Cirencester Rd	Stroud	66
Land south of Pinchington Lane	West Berkshire	64
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School	Cherwell	60
Land at the Beacon, Tilford Road	Waverley	59
Land to Rear Of 28 - 34 Bedale Road	Hambleton	59
Hanwell Fields Development	Cherwell	59
Fenton Grange	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm, Carleton Road	Wakefield	50
Land off Elizabeth Close	West Lindsey	50

The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

Read more

You can read more of our research and insight at **lichfields.uk**

Our bespoke products, services and insights



How does your garden grow?

A stock take on planning for the Government's Garden Communities programme



Garden Communities

Unlocking the potential of new settlements and urban extensions



Headroom

Objective assessments of local housing needs



Sizemix

Securing the right mix in residential development proposals

Contacts

Speak to your local office or visit our website.

Birmingham

Jon Kirby
jon.kirby@lichfields.uk
0121 713 1530

Bristol

Andrew Cockett
andrew.cockett@lichfields.uk
0117 403 1980

Cardiff

Gareth Williams
gareth.williams@lichfields.uk
029 2043 5880

Edinburgh

Nicola Woodward
nicola.woodward@lichfields.uk
0131 285 0670

Leeds

Justin Gartland
justin.gartland@lichfields.uk
0113 397 1397

London

Matthew Spry
matthew.spry@lichfields.uk
020 7837 4477

Manchester

Simon Pemberton
simon.pemberton@lichfields.uk
0161 837 6130

Newcastle

Jonathan Wallace
jonathan.wallace@lichfields.uk
0191 261 5685

Thames Valley

Daniel Lampard
daniel.lampard@lichfields.uk
0118 334 1920

Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no.2778116. © Nathaniel Lichfield & Partners Ltd 2020. All rights reserved.

Appendix 2 – Transport Technical Note (DTA)

1.0 Introduction

1.1 This transport note has been prepared by DTA Transportation (DTA) on behalf of Taylor Wimpey PLC to review the Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy.

1.2 Monmouthshire County Council is consulting on a new RLDP Preferred Strategy. The Preferred Strategy is the first statutory consultation stage in the Plan preparation process and provides the strategic direction for the development and use of land in Monmouthshire (excluding the area within the Brecon Beacons National Park) over the Plan period 2018 to 2033 and identifies how much growth is needed and where this growth will broadly be located. It represents the completion of a period of Pre-Deposit Plan preparation and engagement, the outcome of which has had a clear influence over the selection of the Preferred Strategy.

1.3 In August 2021 DTA produced a Transport Appraisal to support a residential led mixed-use development at "Ifton Manor Farm (Site A)" (ref. CS0253) which is being promoted by Taylor Wimpey PLC. This was submitted as part of the Stage 2 Call for Sites in August 2021. The site was being promoted as part of the Call for Sites by Monmouthshire County Council as part of the Local Development Plan review and The Vision Statement prepared by EDP showed that the site would accommodate 11 hectares (circa 440 dwellings) of residential development and 0.91 hectares (circa 4,000sqm) of employment uses.

1.4 The RLDP Preferred Strategy report currently identifies Caldicot East (CS0087 and CS0251) as the Preferred Strategic Site Allocation within Severnside with capacity for 925 homes over the RLDP plan period.

1.5 This note has therefore been prepared to review the RLDP Preferred Strategy and the Initial Integrated Sustainability Appraisal Report (ISA) prepared by AECOM in November 2022 to fully understand how and why Caldicot East was selected as an allocated site for the Severnside area in preference to the Ifton Manor Farm site.

2.0 Review

2.1 The stated intention of the ISA is to provide a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues.

2.2 The aim of ISA is purportedly to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts.

2.3 In order to address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP Preferred Strategy, which build upon the Adopted LDP objectives, and the well-being objectives set out in the Monmouthshire Well-being Plan.

2.4 In terms of transport, Objective 15 refers to Accessibility which states: *To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car*.

2.5 Under Table 3.1 – ISA Framework, the Transport and Movement objective is further defined as being:

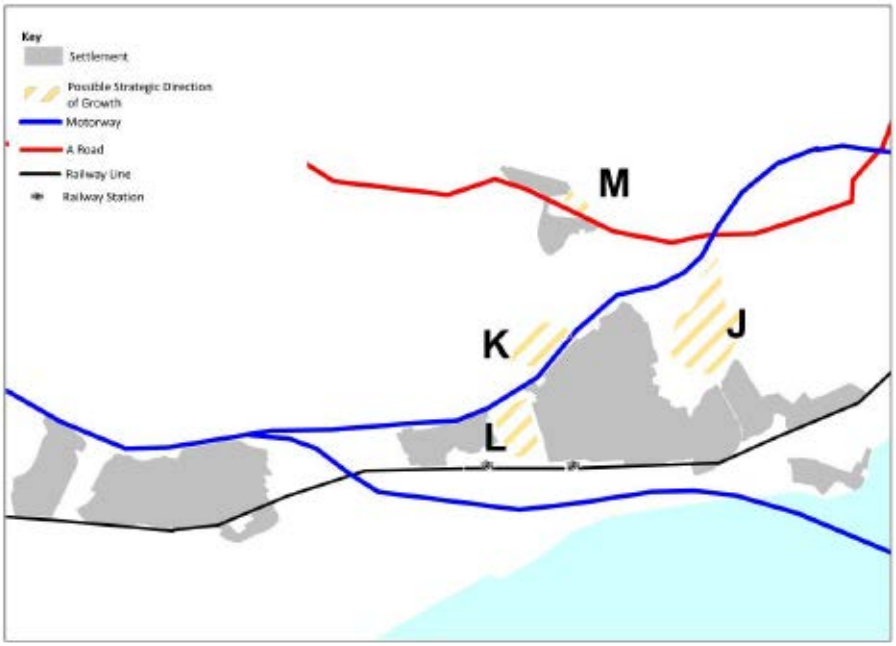
> *To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.*

2.6 In the June 2021 Preferred Strategy, Monmouthshire County Council identified a number of potential Strategic Growth Options for each of the Primary Settlements and Severnside. There are four possible strategic growth areas/ options for Severnside are set out below:

- Option J – Land north east of Caldicot.
- Option K – Land north west of Caldicot.
- Option L – Land west of Caldicot/ east of Rogiet, and
- Option M – Land east of Caerwent.

2.7 Their locations are shown below.

Figure 5.6 Severnside strategic growth areas



2.8 Land at Ifton Manor Farm, Caldicot is referred to as Option L and Option J is the currently preferred allocated site for residential development.

2.9 The strategic growth options identified above were subject to a comparative appraisal under each ISA theme objective. A review has therefore been undertaken of the strategic growth options in relation to Accessibility (Objective 15).

2.10 The report notes that "*based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2*."

2.11 The table below sets out the summary appraisal findings for the Severnside growth

area. In terms of Transport and Movement, the table identifies Option L as best performing compared to the other sites as reflected by its number one ranking.

2.12 That is self-evidently correct given the site is located immediately adjacent to Severn Tunnel Junction Railway Station (and Caldicot Railway Station) and existing public transport networks. It can be well connected to existing active travel corridors.

Severnside
Table 6.6: Summary appraisal findings for Severnside growth areas

ISA Themes	Rank/ Significant effects	Categorisation and rank			
		Option J	Option K	Option L	Option M
Economy and Employment	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Population and Communities	Rank	1	2	1	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Equalities, diversity and social inclusion	Rank	2	3	1	4
	Significant effect?	No	No	No	No
Transport and movement	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Natural Resources	Rank	2	2	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	2	3	1
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Historic Environment	Rank	3	2	1	2
	Significant effect?	Uncertain	Uncertain	No	Uncertain
Landscape	Rank	3	3	2	1
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Climate Change	Rank	1	1	3	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

2.13 The documents states that in terms of differentiating between Options J and L for the above ISA themes, specifically Transport and Movement, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.

2.14 The report goes on to say that access to sustainable transport throughout the Severnside area is good, but **Option L is best located in terms of access to Caldicot station, being a 0.5 mile/ 10-minute walking distance away**. Option K is within 800m of the station, and this would involve crossing the M48 and is therefore not seen to be particularly accessible. Option J is 1.1 mile/ 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north.

2.15 In terms of bus services in the area, Options L and M are well located; **Option L is located adjacent to bus services on Rogiet Road and Longfellow Road**, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245 detached by the Country Park.

2.16 It concludes that Option L performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within Caldicot and Rogiet, and for wider commuter journeys.

2.17 It further states that all Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

2.18 This represents a fundamental flaw in the process.

2.19 Option L is located in an area with existing sustainable transport opportunities which would not require significant infrastructure improvements. In comparison by their own assessment Option J would require significant infrastructure investment to achieve Objection 15 of the ISA theme.

2.20 It is unclear how the report concluded that Option J meets Objective 15 of the ISA themes. Page 314 of the report acknowledges that residents are likely to be highly reliant on the private car due to its distance from Caldicot Train Station and lack of bus services near the site.

2.21 Based on the above and in a manner consistent with the approach adopted in the ISA, a more detailed appraisal of the strategic growth areas accessibility through active travel and public transport has been undertaken as per the table below (taking from DTA Transport Appraisal dated August 2021). This headline assessment demonstrates that Option L has substantial (existing and potential) advantages over the other sites being considered in Severnside in terms of its sustainable travel connectivity.

Site	Active Modes	Score	Bus Access	Score	Access to Station	Score	Distance to main facilities	Score	Total
K	Limited provision (currently less than 1.5m wide) No scope to improve.	-2	No existing service and unlikely to be a self supporting solution. Will require on going subsidy. Nearest bus stop located on the B4245 approx. 280m from the northern parcel of land and 400m from the southern parcel of land.	-2	Circa 2km with lack of nearby walking and cycling facilities to the station	-2	Circa 2km with lack of nearby walking and cycling facilities to access main facilities	-2	-8
J	Limited provision (currently less than 1.5m wide) Limited scope to improve.	-1	Good existing provision. Nearest bus stop located on Caldicot Road approx. 900m from the site.	1	Poor (5km walk) might be improved by bus improved access	0	Adjacent employment areas and within walk distance of Caldicot centre	1	1
L	Good existing facilities and will be improved by access to station	1	Good existing and excellent future provision. Nearest bus stop located on the B4245 approx. 550m from the site.	2	Excellent and will be improved	2	Max 2km with opportunities to improve links	1	6
M	Quiet streets in village but limited scope for improvement	0	Only 4 buses a day at present. Could be enhanced but unlikely to be financially viable long term. Nearest bus stop is located on the A48 approx. 280m from the site.	-1	Poor	-2	Limited facilities in village and distant from Caldicot with no opportunities to improve link	0	-3

Ranking

2 Excellent
1 Could be excellent with improvement
0 Acceptable (or could be with improvement)
-1 Poor (but some improvement possible)
-2 Poor with no or limited opportunity for improvement

2.22 In conclusion, it is unclear how Option J does (or indeed could) meet the criteria of Objective 15 of the ISA themes which seeks to provide opportunities for active travel and integrated sustainable transport above use of the private car.

2.23 To meet those objectives, Option J would require significant investment in active travel corridors and ongoing and significant subsidy of public transport services to connect to the identified desire lines.

2.24 In contrast Option L already has existing sustainable transport opportunities which would not require significant infrastructure improvements.

3.0 Monmouthshire RLDP Candidate Sites Active Travel Assessment and Highways Assessment

3.1 Monmouthshire County Council have produced the Candidate Sites Active Travel Assessment and Highways Assessment report for the development site (CS0253).

3.2 The highways assessment sets out key highways and transport questions relating to highway access, highway network capacity and potential improvement works. The highway authority considers the size and scale of the development will have an impact on the immediate local highway network. Any future planning application for this site would be supported by a Transport Assessment which would consider off-site junction modelling and any potential improvements, if required.

3.3 It recommends that the highway authority considers the site can be developed for the intended purpose, any mitigation and improvements will be subject to further detailed review and analysis submitted in support of any future submission (Transport Assessment etc).

3.4 The Active Travel Assessment considers the location of the site in terms of Active Travel Routes. It concludes:

"*From an active travel perspective, the site is suitable to be developed for its intended purpose as submitted, or with appropriate mitigation and further dialogue with the LPA*".

"The site sits within a designated locality and within the Active Travel strategic focus

distance of 3 miles to key destinations (education, health, employment and shopping). Good walking links are made out of the site and off-road provision is given to walkers and wheelers".

3.5 It is clear from both assessments that the highway authority considers the site can be developed for the intended purpose and is located within the Active Travel strategic focus distance of 3 miles to key destinations.

Forester House
Doctor's Lane
Henley-in-Arden
Warwickshire
B95 5AW

Tel: +44(0)1564 793598
inmail@dtatransportation.co.uk
www.dtatransportation.co.uk

Appendix B:
Vision Statement
February 2023

IFTON MANOR FARM

CALDICOT

VISION STATEMENT

Taylor Wimpey

FEBRUARY 2023

Consultant Team

Taylor Wimpey	House Builder/Developer
edp	Masterplanning and Landscape
David Tucker Associates	Highways
thinkurban	Drainage
savills	Planning
Solitys Brewster	Ecology
Cotswold Archaeology	Heritage
smsplc	Utilities
Reading Agricultural Consultants	Agricultural Land Classification

	Report Ref: edp6487_r002			
	Author	Formatted	Peer Review	Proofed by/Date
r002_DRAFT	OS/GH	OS	PD	-
r002b_FINAL	OS/GH	OS	PD	FM 230821
r002b	OS/GH	OS	-	-
r002c	OSh/GHo	PDa	-	-

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of The Environmental Dimension Partnership Ltd.
All plans are reproduced from Ordnance Survey digital map data. © Crown Copyright 2023. All rights reserved. License number 0100031673. Imagery © 2023 Getmapping plc, Map data © 2023 Google United Kingdom.

CONTENTS

1.	Vision	4
2.	A Strategic Location for Growth	6
3.	Site Description and Context	9
4.	Constraints and Opportunities	10
5.	Making the Place	12
6.	Placemaking and Sustainable Design	14
7.	The Six Principles	15
8.	Development Qualities in Achieving Good Placemaking	16
9.	Shaping the Place: Sustainable Design Strategies	18
10.	Blue and Green Infrastructure Strategy	20
11.	Health and Well-being	24
12.	Conclusion	26

1. VISION

The development proposed at Ifton Manor Farm, Caldicot will be a vibrant new development with modern living and placemaking at its heart; a sustainable place that will delight those who live, work, play and visit. Set within an attractive field boundary setting, the site is extremely well connected to the existing settlements and facilities of Rogiet and Caldicot, as well the wider context with Newport and Cardiff to the west, market towns of Monmouth to the north and Bristol to the east.

A network of low-speed streets will create a connected development that promotes walking and cycling with multi-use pathways that link with the surrounding network and reducing dependency on cars. This location provides a truly sustainable place to live and work and is ideally located to maximise the benefits of rail travel due to its proximity to Severn Tunnel Junction and Caldicot stations.

The development will offer lasting value to the surrounding community by providing a range of high-quality homes and a mix of tenures. This is further complimented with the provision of an employment area in the north-west of the site, directly relating to the existing employment on the east of Rogiet at Cheeseman's Industrial Estate. Furthermore, a mobility hub and sustainable, mixed-use development is proposed in the heart of the development, which will create a vibrant neighbourhood that operates in harmony with its surroundings and supports a more sustainable way of living.

Taylor Wimpey is engaging with Welsh Government and MCC with regards to the deliver of a link between the B4245 and the Severn Tunnel Junction Station, an aim that is driven by Burns Review which aims to look at removing private cars from the M4 and The Future of Road Investment in Wales (August 2022) which recommends that this link has the potential to support modal shift to public transport. Current access to the Station through the adjacent residential neighbourhoods is poor, and so the indicative masterplan makes an allowance for this important link which will facilitate and prioritise direct active travel and bus access to the Station.

A strategic north-south GI corridor maintaining the Green Wedge characteristics of the landscape and creating a gap between parcels so that settlement identity is retained. Based around a series of public open spaces, Green Infrastructure (GI) corridors, and footpaths, the vision is to create a place that connects its residents to nature and that responds to the ecological and landscape opportunities of the site. By retaining existing landscape features within a series of green corridors, and by managing water resources naturally within them, biodiversity is to be enhanced. The areas of flood risk in the southern portions of the site in particular inherently lend themselves to GI enhancement. This multi-functional mosaic of green spaces will provide vital habitat for wildlife, space to exercise, varied play spaces and community orchard, thereby promoting physical and mental health and well-being.

This is a holistic approach to net gain with taking cars off the network, capturing the natural capital with an enhanced GI strategy, inclusive social infrastructure, together with affordable new homes and an economic dividend to the local economy.

This will allow us to introduce the new well-being metric for measuring total sustainability in placemaking.



Figure 1: Vision Plan (edp6487 d009e)

2. A STRATEGIC LOCATION FOR GROWTH

This Promotional Document has been prepared by The Environmental Dimension Partnership Ltd. (EDP), on behalf of Taylor Wimpey. This document demonstrates the suitability of the site known as Ifton Manor Farm, Caldicot. This has been prepared following initial technical assessments and reviews of the physical context of the site and analysis of the unique opportunities it brings.

The vision for the site is to provide a mix of homes, and set in a multi-functional network of green spaces and play areas, that deliver a high-quality neighbourhood that meets the needs of modern living, now and in the future.

This document demonstrates why the site should be viewed as a sustainable location for growth within the local authority area. It also sets how an landscape-led approach to placemaking can bring forward a new and vibrant neighbourhood for the local area that builds upon its excellent strategic location and transportation connections.

Existing Public Rights of Way (PRoW) and pedestrian/bicycle routes provide car-free ways of accessing nearby services and beyond, encouraging healthier lifestyles. The site is located within easy walking and bicycle distance of a number of local facilities, including schools, leisure facilities, medical providers and food/drink and local stores. A frequent bus service is available near the site entrance, offering car-free access to employment centres and transportation hubs in Newport and beyond.

The site is located between the market town of Caldicot and the village of Rogiet in South Wales. In wider context, the site is in close proximity to the M4, the M48 and approximately 15km east of Newport city centre, with excellent road links to employment centres in the greater Newport area, South Wales and Bristol.

The site's location makes it an ideal place for public transport orientated growth as it is near to existing train stations, active travel routes and excellent public transport links that would allow car-free access to surrounding destinations. Severn Tunnel Junction and Caldicot train station to the east and west retrospectively can both be reached by bicycle within 5 minutes.

The site has safe and convenient walking links to existing bus stops located nearby on the B4245 and Longfellow Road, which provide regular services to the surrounding area.



Figure 2: Strategic Context

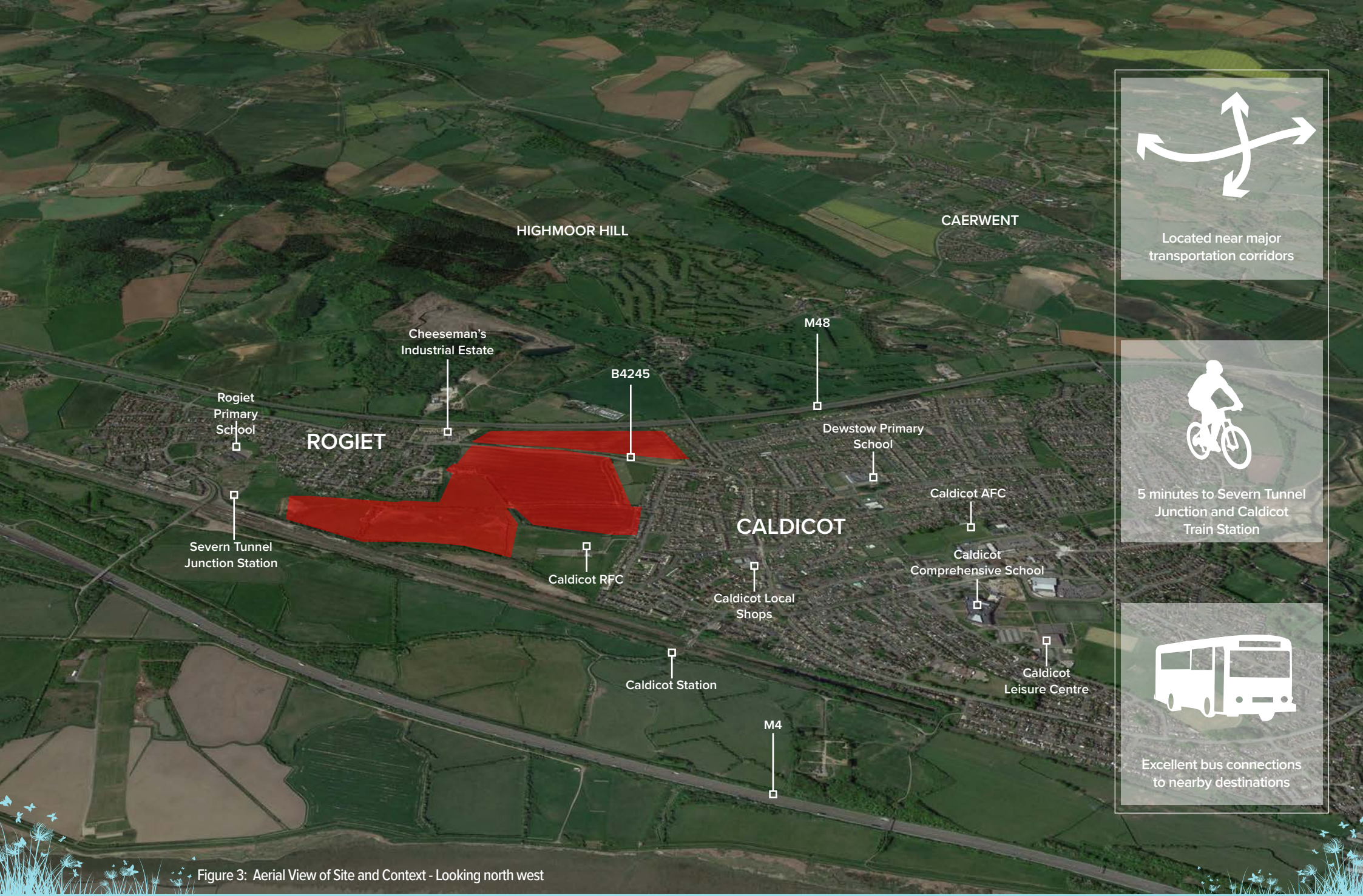


Figure 3: Aerial View of Site and Context - Looking north west



Figure 4: Site and Surroundings



Residential development backing onto eastern boundary



Modern development backing onto eastern boundary



View looking south from the B4245 (Newport Road) along the western boundary



View looking north along the north-eastern boundary from the B4245 (Newport Road)

3. SITE DESCRIPTION AND CONTEXT

The site is situated directly east of Caldicot and to the west of Rogiet. Newport Road (B4245), which runs east-west through the centre and splits the site into two parts. The northern half of the site comprises one agricultural field with an area of 7.63ha. The southern half of the site comprises five green agricultural field parcels that total 27.18ha. The majority of parcels are bound by existing established hedgerow of varying quality and density.

The site is generally flat, however, there is a gentle slope from the high point in the north-east corner (approximately 16m above Ordnance Datum (aOD)) to the lowest point in the south-west corner (approximately 4m aOD).

The fields lie immediately to the north of the railway line connecting Cardiff to London and immediately south of the M48 motorway which runs along the old Severn Bridge. The B4245, which runs parallel to the M48, serves as the primary link between the surrounding towns and villages.

Existing residential development along Longfellow Road lies to the east of the site and predominantly backs onto the boundary. Caldicot RFC is located in the neighbouring field parcel directly beyond the south-east corner of the site.

The western boundary is bound by existing residential development of varying ages and sporadic areas of woodland. Most residential development backs onto the site boundary with some more recent development occasionally siding on. Rogiet Primary School and Rogiet Allotments are situated to the west of the site and are served by public rights of way running through the site.

An existing PRoW enters at the centre of the site from Longfellow Road and connects across the width of the site to Rogiet Primary school and onto Severn Tunnel Junction to the south-west.

Built form in the surrounding area consists of predominantly 2 storey terraced and semi detached houses with 3-4 storey flats found in the higher density areas.

4. CONSTRAINTS AND OPPORTUNITIES

The following points summarise the analysis of the design influences at, and surrounding the site. Key elements of this analysis are illustrated graphically on the plan opposite and described as a series of opportunities and constraints below:

Access and Connectivity

- Opportunity to accommodate Welsh Government's Severn Tunnel Junction Access Scheme through a link road from the B4245 to the station;
- Access for all modes of transport to be taken from the B4245 which crosses the centre of the site running east-west;
- Create pedestrian/cycle links to both Caldicot and Severn Tunnel Junction Station from the north, and through open space and green infrastructure corridors;
- Take advantage of the high frequency of trains stopping at Severn Tunnel Junction Station from its four platforms;
- Provide access to the rest of the site via an internal spine road that extends through the site from north to south and provide additional access for all modes to the Severn Tunnel Junction Train Station to the south;
- Potential to provide an element of mixed use, including a mobility hub, to promote a sustainable, walkable neighbourhood;
- Opportunity to take advantage of the site's location between settlements and the services within both; and
- Create additional pedestrian and cycle connections to link with the existing PRoWs/ Byways east and west of the site.

Utilities

- Minimise impact of overhead power lines with building form and landscaping.

Socio-Economic

- Create an opportunity to offer a wide range of housing types and sizes to help better meet local needs;
- Potential to deliver a park and ride facility near Severn Junction Train Station; and
- Opportunity to provide additional employment land along with a co worker hub.

Landscape and Visual Context

- Respect the privacy and amenity of existing development east and west of the site and retain positive elements and characteristics of the two neighbouring settlements;
- Retain view corridors through the site by limiting the amount of built form and maximising landscape elements to frame views;
- Minimise visual impact of railway line with appropriate landscaping and buffering;
- Utilise the best characteristics of the areas landscape to create a development of local character that integrates with its context; and
- Retain existing hedgerows where possible along the site's boundaries buffered by areas of linear green space to allow for their enhancement and protection.

Drainage

- Flooding constraints to be acknowledged to ensure that built development avoids areas at risk of flooding;
- Use appropriate surface water attenuation measures and sustainable drainage systems (SuDS) to create a naturalistic environment; and
- Locate swales routes to convey water to ponds and provide habitat for wildlife.

Noise

- Take into account the noise from road and rail through careful planning and appropriate buffers.

Ecology

- An in depth ecology report has been produced by Soltys Brewster in addition to an extended Phase 1 Habitat survey. The findings of this survey and subsequent report were fed into vision throughout the design process and had an influence on the ecological and landscape led masterplan.

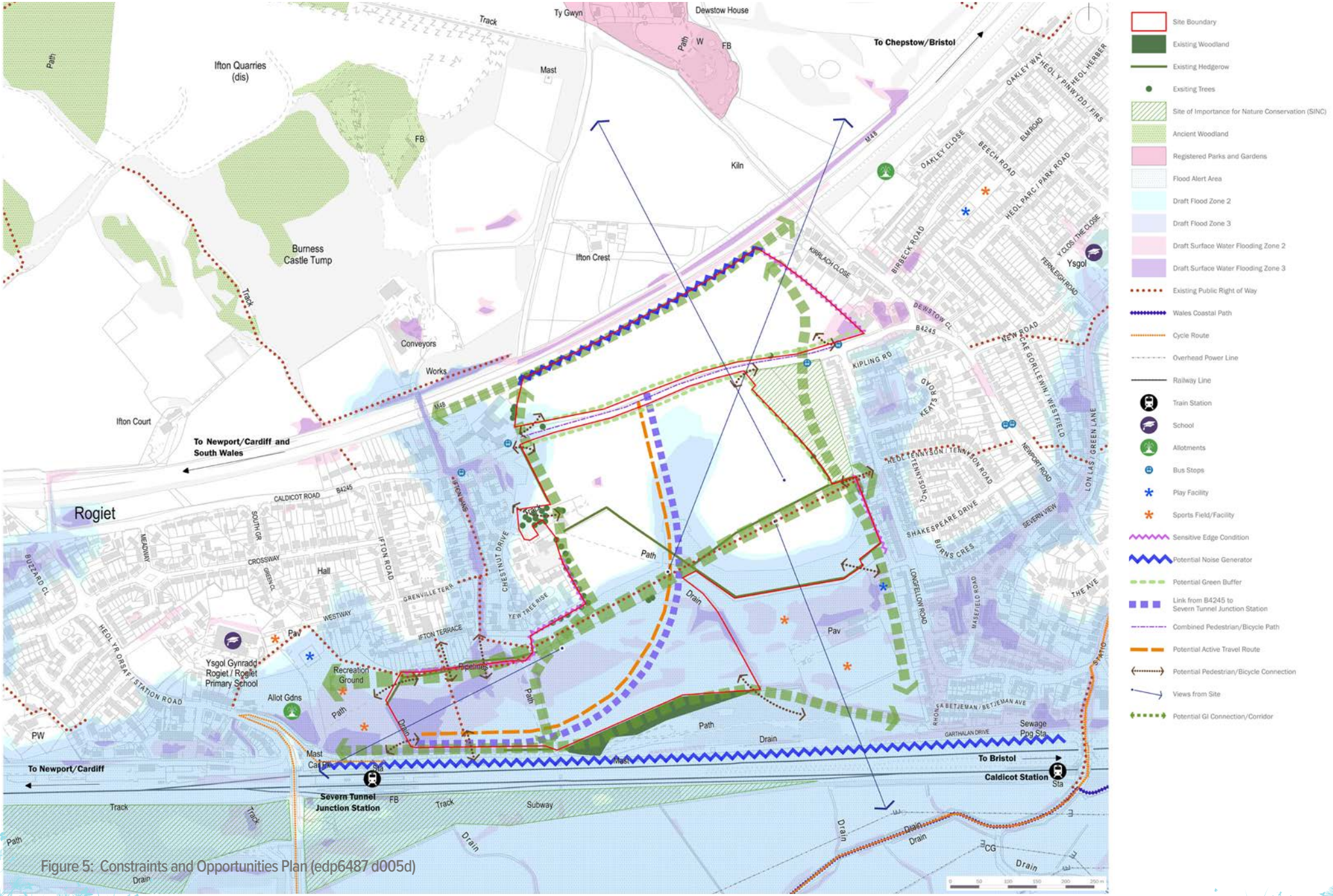


Figure 5: Constraints and Opportunities Plan (edp6487 d005d)

5. MAKING THE PLACE

New Homes

New, beautifully designed homes, which respond to local characteristics and preferences, would improve accessibility to first time buyers and increase the range of housing types, tenures and sizes in the locality. Providing 50% of the homes as affordable to meet the local need.

Co-worker Hub and Homeworking

“Welsh Government is encouraging an increase in remote working and has set a long-term ambition for 30% of the Welsh workforce to work away from a traditional office, to be achieved by giving people more options and choice on their workplace.”

This site can deliver a scheme with an innovative Co-worker Hub which would reduce travel demand from the site by such a flexible working site.

Mixed Use

Alongside the Co-worker and Mobility Hub there will be potential for Café provision, so there is a truly sustainable mix of uses on site promoting keeping local to reduce the need for off-site vehicular trips.

Employment Use

A sustainable location for small scale employment uses and co-working spaces can add to the local economy.







Mobility Hub

This site can set a strong standard for 21st century sustainable design in Wales with innovative travel measures implemented through a site wide travel plan to include the provision of Mobility Hub containing:

- Package Delivery Lockers;
- Mini Play area;
- Bus interchange within the site ;
- EV charging ;
- Community car share scheme with EVs;
- Cycle Lockers for community bike share;
- Fixed bike repair facilities;
- Digital information pillar;
- Wifi/phone charging hub; and
- Potential for a community owned facility to share usage of E-bikes and E-scooters.

Ensure climate resilience

Buildings will be designed with a ‘fabric-first’ approach to improve energy efficiency and reduce carbon emissions. An extensive proportion of the site is to be retained as green space to ensure flood risk protection, and for public health and well-being as well as ecological habitat enhancement, and will incorporate allowances for climate change. New tree planting would alleviate run-off whilst also reducing carbon.

6. PLACEMAKING AND SUSTAINABLE DESIGN

Placemaking and sustainability lie at the heart of current planning policy in Wales and have guided the vision and design development at this site West of Caldicot and to the East of Rogiet. This vision document highlights how a placemaking approach has shaped the design to deliver a high-quality, sustainable place that draws on best practice for urban design.

The Welsh Government 'Future Wales – The National Plan 2040' sets the National Development Framework for Wales. Future Wales enables the principles of sustainable development to be incorporated at all development stages and based on the seven strategic placemaking principles.

These placemaking principles have been incorporated into the design objectives, particularly at Policy 2 - Shaping Urban Growth and Regeneration – Strategic Placemaking.

In addition, Planning Policy Wales (PPW) Edition 11 sets out Welsh planning policy whose primary objective is to ensure the planning system 'contributes towards the delivery of sustainable development' as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW also calls for the planning system to adopt a placemaking approach to plan making, planning policy and decision making and sets out objectives for achieving good design (see left) and a range of placemaking outcomes to which new development must aspire.



Furthermore, Welsh Government's 'Building Better Places' and the Design Commission for Wales' 'Placemaking Charter' (see page 15) provide important principles and guidelines for placemaking that have had a bearing on the design.



7. THE SIX PRINCIPLES

People and Community

The needs, aspirations, health and well-being of all people are considered at the outset. Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

Movement

Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles. Well designed and safe active travel routes connect to the wider active travel and public transport network, and public transport stations and stops are positively integrated.

Public Realm

Public realm streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity. They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated. They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.







Location

Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected. The location of housing, employment, leisure and other facilities are planned to help reduce the need to travel.

Mix of Uses

Places have a range of purposes which provide opportunities for community development, local business growth and access to jobs, services and facilities via walking, cycling or public transport. Development density and a mix of uses and tenures helps to support a diverse community and vibrant public realm.

Identity

The positive, distinctive qualities of existing places are valued and respected. The unique features and opportunities of a location, including heritage, culture, language, built and natural physical attributes are identified and responded to.

The vision, and design strategies presented in the masterplan and summarised on the following pages are based upon these placemaking principles and outcomes and will result in a high-quality development that responds to this planning policy framework.

8. DEVELOPMENT QUALITIES IN ACHIEVING GOOD PLACEMAKING



Movement and Mix of Use

- Supports a wide range of uses and multi-functioning spaces;
- Appropriate mix of uses that help to reduce the need to travel longer distances;
- Supports local businesses and their supply chains;
- Walking, cycling, playing, socialising and exercising are visible, welcome and normalised in streets and spaces;
- Outstanding public transport connections;
- Places for social interaction and places for incidental meetings;
- Severn Tunnel Junction Road link to focus on taking vehicles off wider road network;
- Opportunities for food production/ community gardens; and
- Mix of housing tenures and types.



People and Community Identity

- People are involved meaningfully and consistently over time in the development and the delivery of proposals in order to generate ownership;
- Has a distinct identity;
- Safe and welcoming;
- Opportunities for community to grow and develop;
- People have a sense of pride in where they live, work and/or spend leisure time;
- Promotes community ownership; and
- People have the opportunity to personalise their properties and external spaces.



Location and Public Realm

- Almost 60% of the site provides multi-functional GI and open space;
- Development in well-connected locations that support or complement existing places;
- Well defined streets and public spaces;
- Streets that prioritise walking, cycling and playing;
- High quality, well distributed green spaces that supports everyday physical activity, provides an attractive setting and supports biodiversity;
- An appropriate variety of spaces that support different uses;
- Use of materials that are robust, sustainable and contribute to character;
- Well integrated green infrastructure that delivers targeted benefits such as: active travel, reduce surface water, mitigates air pollution, noise abatement, supports biodiversity; and
- Connections to nature at different scales including close to people's front doors to experience as an everyday part of life and in children's learning through play.
- Landscape that contributes to the character and attractiveness of the place as well as increasing biodiversity;
- Density appropriate for the location that helps to support public transport and local facilities;
- Carbon neutral development that supports the decarbonisation agenda;
- Good digital connectivity to ensure people can work remotely;
- An inclusive environment in which people with different physical abilities, ages or backgrounds are not excluded and all people feel safe; and
- Homes and workplaces that meet the needs of users and are adaptable for the future.
  – Active travel connections provide a more direct route to key destinations.



9. SHAPING THE PLACE: SUSTAINABLE DESIGN STRATEGIES

The key environmental strategies which have guided the scheme are:

- Retain natural assets on site insofar as is possible, specifically the trees and hedges at the site boundaries and the river corridor landscape;
- Create a multi-functional GI network which connects, retains and enhances habitat, wildlife routes and connections across the site, and knits the scheme into the wider GI network and maintains the Green Wedge characteristics of the landscape. Such features should be attractively designed as part of an onsite GI network to improve character, provide biodiversity and visual value and contribute to placemaking;
- Design SuDS features and a drainage strategy to provide recreational, visual and ecological benefit. SuDS attenuation and conveyance features should be included within the streetscape, intercepting, slowing and filtering surface water flows as close to source as possible;
- The site will drain naturally to the south and with the central floodzone area within the site can provide a prime opportunity as a suitable location for sustainable drainage for a biodiverse wetland park with ponds and marsh habitats bisected by a network of paths and/or boardwalks; and
- All SuDS features should be designed as attractive landscape component with permanently or seasonally wet attenuation features providing biodiversity enhancement in this part of the site.

The key built form and movement strategies that have guided the scheme are:

- Provide an element of mixed use, including a mobility hub, to promote sustainable, walkable neighbourhood placemaking principles and to take advantage of the site's location;
- Provide an attractive entrance gateway with a series of nodal spaces set around open spaces to create memorable spaces and inform wayfinding;
- Ensure that the character of the development engages appropriately with that of the existing settlements whilst retaining a distinct separation between Rogiet and Caldicot so that settlement identity is retained;
- The layout structure prioritises the pedestrian/cyclist and offers a range of street characters and styles suitable to the location and function of the street;
- New homes will be of an appropriate scale and form and the development to be designed to 'face out' to provide active edges overlooking public open spaces and corridors; and
- The landscape buffers should also be considered along key boundaries with appropriate planting to filter views where appropriate.





Ensure climate resilience

Buildings will be designed with a ‘fabric-first’ approach to improve energy efficiency and reduce carbon emissions. The proposals will employ a robust approach to flood risk and mitigation and incorporate allowances for climate change. New tree planting would alleviate run-off whilst also reducing carbon.



Environmental and Landscape Principles

The masterplan is guided first and foremost by (GI) requirements. The landscape and environmental issues are at the forefront of the design process, with the masterplan being shaped by the site’s unique characteristics, habitat and wildlife corridors.



Open Space Provision and Play Spaces

New open spaces would provide a range of activities, habitats and functions to appeal to all residents and visitors. Open space to be designed to allow play, relaxation, and exercise, potential for a trim trail and walking/biking trails using the landscape topography to allow people to move freely around and through the site. A mix of play spaces, ranging from informal/ natural play spaces to appeal to a wide spectrum of children/ages.



Improve biodiversity and restore nature

The extensive network of green infrastructure will provide opportunities to enhance biodiversity, habitat and support wildlife. Green public realm and street trees aid biodiversity and local climate resilience by contributing to urban cooling.

10. BLUE AND GREEN INFRASTRUCTURE STRATEGY

Landscape Led Design Approach

The landscape appraisal has informed the masterplan design evolution and enabled an integrated approach to potential landscape and visual opportunities and constraints.

Monmouthshire Green Infrastructure SPG 2015 Policy GL1 (Green Infrastructure) states that development proposals will be expected to maintain, protect and enhance Monmouthshire's GI network.

As identified in the SPG as well as the existing PRoW on site, Rogiet Road is considered to be a green corridor; the land in the C1 Flood Risk area in the south of the site is part of a larger combined GI asset; and the western flank of the site bordering Rogiet is an area identified as having habitat connectivity opportunities. Also, there are two Sites of Importance for Nature Conservation (SINCs) adjacent to the site. One SINC is located on the north-eastern boundary to the south of Rogiet Road and the second SINC is to the south and it is separated from the site by the railway track.

The masterplan takes into account the on-site GI assets listed above and incorporate these into the scheme to enhance connectivity for people and wildlife. Furthermore, the scheme prioritises connections to adjacent habitats such as the SINCs and capitalise on the area considered to have habitat connectivity opportunities on the western flank of the site. It is considered that Rogiet Road does not appear to be a strong green corridor as it passes the site, although the GI SPG identifies this as a corridor. However, the design seeks to create a meaningful green landscaped buffer corridor along the road frontage to connect the GI assets to the east and west.

Proposed Landscape Mitigation

Key principles of landscape mitigation include:

- Strengthen the boundary planting where gaps occur or boundaries are open due to the lack of planting;
- Soften the existing settlement edges bordering the site which are hard and abrupt in places;
- Preservation and continued growth of good quality vegetation on and within the boundary of the site including hedgerows to be retained and enhanced within the scheme;
- A large proportion of the site is to be retained as green space to ensure flood risk protection, and for public health and well-being as well as ecological habitat enhancement; and
- Tree planting within street scenes and private rear gardens as well as retention of good quality on-site tree stock.

The landscape and visual sensitivities of the site have influenced the masterplanning process through an iterative process. The proposals seek to avoid or reduce potential landscape and visual effects. These measures can be summarised as follows:

- The proposals aim to bulk up boundaries and enhance as much of the existing hedgerows through gapping up with species of local provenance. Hedgerow removal considered by careful design utilising existing gaps where possible;
- Habitat enhancement, pedestrian and cycle movement as well as the strengthening of existing Green Infrastructure feature to be prioritised;
- Restoration and management of landscape features would contribute to the character, visual and wildlife amenity of the area as well as providing benefits for the local community;
- Enhanced access to the countryside could benefit future resident and the local community through access to open space proposed in the south of the site;
- PRoW will be retained on site and creating green corridors to minimise the effect on the character of the routes is advised wherever practical;
- Sensitive treatment of the edge bordering Rogiet Road is key to strengthen the local GI network and reduced the visual effects of the scheme. Setting back development and creating a green buffer on both sides of the road has been incorporated into the masterplan as a result; and

- Continued growth and management of the site's tree and hedges would be secured by the proposals, creating increased containment of the site and a softened edge to the existing and proposed settlement edges.

Multifunctional Green Infrastructure

The GI strategy for the site is based on principles of overlapping landscapes of different function and character that deliver a broad range of ecosystem services (described below). These come together to form a cohesive and multi-functional GI network that links with the wider landscape, each displaying differing values according to its purpose and location. The multiple and various benefits provided to humans by the natural environment and from healthy ecosystems within that environment. These ecosystem services, when functioning properly, offer such things as natural pollination of crops, clean air, extreme weather mitigation, human mental and physical health and well-being.

The ultimate aim is to balance the social, environmental and economic needs to address climate change adaptation and resilience for the benefit of future generations. This integrated GI approach is in-line with current national policy, specifically the strategic placemaking policies of Future Wales (Policy 2) and the PPW sustainable placemaking outcomes for environmental protection. The key GI areas, links and features are highlighted on the GI Strategy plan.

The Masterplan shows there is extensive areas of retained landscape fabric overall across the site and within the layout. Furthermore, the design has responded to open space and green edges by proposing outward facing edges across the whole scheme. Enhancement of retained features is proposed throughout providing buffers to existing landscape features which would be managed. This approach would ensure the health and longevity of landscape features and provide protection and enhancement to features such as hedgerows, hedgerow trees and tree belts through the incorporation of landscape buffers.

Development should front onto part of the route for natural surveillance, and good urban design principles employed to activate the rights of way and increase pedestrian connectivity to the sports facilities in the south-east. This route could also incorporate a trim trail and link to other areas of public open space.

Blue and Green Infrastructure is at the heart of 'Placemaking'. It is important that all future residents have access to and a connection with nature and open spaces. Sustainable drainage features such as ponds, swales and rain gardens will contribute to an attractive and sustainable development and create varied and interesting public spaces.

The wildlife benefits anticipated as a result of the landscape strategy include a stronger green infrastructure network on site, which would in turn strengthen the local green infrastructure network. Due to the location of the flood zone, around two thirds of the site will remain undeveloped and given over to GI. As a result, a mosaic of landscape habitats and recreational provisions could be implemented in replacement of the pastoral fields currently seen on site. This would in turn facilitate a biodiverse landscape framework in which the built form would be built, and the balance of needs for people and for wildlife would be considered.

Landscape features of the site such as internal hedgerow or tree belts, as well as the vegetation found on parts of the site boundary are proposed to be retained and enhanced where possible, with additional shrub and tree planting proposed within the site which aims to provide a soften development, as both it matures.



Based on the existing site features, potential views in and out of the site and the existing settlement edges, the masterplan has evolved from the Landscape Appraisal recommendations as follows:

1. Landscape buffers will be created on all sides, particularly to the east and west to offset development from existing settlement edges and to reduce visual impact;

2. Strong strategic north-south GI corridor provided for the retention of Green Wedge characteristics of the landscape helping to respect the identity of neighbouring settlements. Site-wide open space forms a multi-functional and GI network that will be accessible to all;

3. Landscape betterment will be delivered to improve existing vegetated boundaries in poor condition, or where they perform poorly from a GI perspective. Tree planting within GI corridors and open space will help buffer development and reduce visual impacts;

4. Retention and a considered design response to on site PRoW to create a green corridor and to maintain and enhance the connectivity between Rogiet, Caldicot and Severn Tunnel Junction. Development offset 15m from key hedgerow with enhancement to reduce visual impact and to improve integration;

5. Potential to provide land for transportation interchange and/or park and ride associated with Severn Tunnel Junction Station, subject to discussion with MCC and Transport for Wales;

6. Appropriate colours and materials together with landscape treatments blend development into its surroundings and minimise visual impact. Homes to be orientated to maximise potential for solar panels and passive solar gain, and green roofs where possible;

7. Employment buildings are proposed away from existing residential dwellings, closest to the Cheeseman Industrial Estate adjacent to the north-western boundary. Employment buildings would be of a similar scale to a two storey dwelling and will not exceed c.10m to ridge height;

8. Expansive area of community space to be created within the southern fields to accommodate informal recreation space with access from existing PRoW;

9. GI and view corridors to connect the new development to its surroundings, and southward views will be maximised towards Portishead within the proposed layout;

10. Soft landscaping to frontages of dwellings, tree planting within the street layout and landscape buffer treatment will be employed along Rogiet Road;

11. Provide a variety of play spaces and active spaces to improve community health and lifestyle, including pathways provided through multi-functional green spaces that provide opportunities for exercise and a chance to interact with wildlife;

12. Potential for community orchards and edible landscapes that promote healthy living, local food production and improve bio-diversity, and reduce overall visual impact;

13. Local GI Network: Permeable street network that incorporates active travel and green infrastructure, and convenient pedestrian and bicycle connections providing car-free options for movement throughout the site and convenient access to nearby services and facilities;

14. SuDS infrastructure promoting enhanced biodiversity benefits and flood resilience incorporated into multi-functional GI corridors. Permeable surfaces for parking and hard surfaces linked through SuDS and integrated into GI network; and

15. 30m offset provided to adjacent SINC to strengthen GI connectivity and provide an opportunity for habitat, planting and linkages across the site.





Figure 6: Green Infrastructure Plan (edp6487_d010a)

11. HEALTH AND WELL-BEING

The proposal will demonstrate that active and healthy lifestyles can be positively influenced - and encouraged - by the design and character of its living environments and its open spaces. Where we live affects our health and well-being and taking part in regular physical activity is key to maintaining a healthy lifestyle. Our vision for is to enhance the lives of both the existing and new residents by designing and creating a new place which promote healthy lifestyles for everyone.

UK research shows a strong correlation between outdoor activity and preventing obesity, diabetes and depression. The green infrastructure provides an active landscape where outdoor activity can be a part of everyday life. The masterplan integrates walking and cycling routes, open spaces, parks and orchards, and wetlands. An edible landscape and community orchard provide opportunities for fruit picking that can bring people together, creating shared memories together with physical and social benefits.

Research also shows that exercise in nature is associated with greater feelings of energy, revitalization, enjoyment and positive engagement as well as greater decreases in tension, depression, anger and confusion. By providing ample opportunities for pedestrian and bicycling, together with a circular trim trail with exercise stations, residents will be able to exercise and enjoy the natural setting of the development.

In particular, access to the countryside and the Wales Coastal Path is very close to the site, just to the south of the railway line, and adjoins Caldicot Station.



MASTERPLAN PROPOSAL	BENEFIT
Providing expansive areas of open space, with a variety of play areas, trim trails, informal public spaces rich in habitat creation, through to more formal amenity greens.	Organised sports and recreation are a popular means of expressions and enjoyment in people. Time with family and friends strengthens relationships and is central to maintaining positive mental health and wellbeing. Informal recreational spaces and trim trails allow people to explore and go 'off-piste' and connect with nature.
The network of paths that link with nearby rights of way and trails providing opportunities to explore the site and connect with the surrounding area.	More people prefer being active in fresh air, there has been a strong increase in people connecting with nature during the COVID pandemic and the plan encourages this interest in physical activity.
Accessible and safe paths for walking running and cycling connect the proposed neighbourhoods with each other and the surrounding area.	Movement can reduce avoidable diseases (cardiovascular and Type 2 Diabetes) and obesity in all ages. Even a short, low-intensity walk can boost mood and energy levels.
A network of multifunctional open spaces providing a rich and diverse mix of ways to stay active, including 'edible landscapes' with community orchards.	Low-impact exercise that activates a broad range of muscle groups helps people remain supple, eases arthritic pain, improves strength, endurance and mobility, slows cognitive decline, reduce stress levels and feelings of anxiety.
Structured tree planting and wetlands will reinforce the local character, manage water and enhance ecology and biodiversity.	Connecting with nature maintains interest in physical activity and activities create opportunity for learning, volunteering and employment.

12. CONCLUSION

The proposals present a key strategic sustainable development opportunity for a new 21st Century neighbourhood to complement the existing settlements of Rogiet and Caldicot.

Consistent with Future Wales policy the delivery of the masterplan will demonstrate the best in placemaking, encapsulating high quality built form which respects and enhances the natural environment. Sustainable travel behaviour is integral to our vision, with cycling, walking and public transport connections within and outside of 'red line' of the masterplan will promote active and healthy lifestyles. A mobility hub and mixed-use development is proposed in the heart of the development to promote sustainable development and walkable neighbourhood.

The proposals will connect well to Severn Tunnel Junction Station as well as the surrounding settlements, and wider employment areas to promote sustainable travel and as a thriving place with a strong sense of community, bustling neighbourhood centre and publicly accessible open spaces which encourages healthy lifestyle choices and wellbeing.

Taylor Wimpey is engaging with Welsh Government and MCC to deliver a link between the B4245 and the Severn Tunnel Junction Station to improve current access to the Station and which will facilitate and prioritise direct active travel and bus access to the Station and has the potential to support a modal shift to public transport.

Taylor Wimpey will provide an extensive choice of well designed homes, with a mix of tenures to provide extensive choice and variety. Local architectural influences will be captured within innovatively designed homes, to sustainably grow and compliment the existing community.

The proposals will transform privately owned land into extensive publicly accessible open spaces and connect strongly with the existing communities. Almost 60% of the site is provided as a mosaic of multi-functional GI and open space that will be interwoven into the landscape fabric to increase biodiversity whilst providing access to a variety of outdoor spaces and safe green routes.

The proposals therefore will be an inclusive and accessible expanded community to meet the daily needs of its residents, workers and neighbours, through employment, community, and recreation provision. This is a place where people will want to live, work, relax and explore.







The Environmental Dimension Partnership
First Floor, The Bonded Warehouse, Atlantic Wharf, Cardiff CF10 4HF
t 02921 671900 e info@edp-uk.co.uk w www.edp-uk.co.uk

Appendix C:
Agricultural Land Classification and Soil Study Survey July 2020

READING AGRICULTURAL CONSULTANTS

July 2020

Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals

Agricultural Land Classification and Soil Resources

at

Ifton Manor Farm, Caldicot

Beechwood Court,
Long Toll, Woodcote,
RG8 0RR

01491 684 233
www.reading-ag.com

1 Introduction

1.1 Reading Agricultural Consultants Ltd (RAC) is instructed by Savills on behalf of Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals to investigate the Agricultural Land Classification (ALC) and soil resources of land at Ifton Manor Farm, Caldicot by means of a detailed survey of soil and site characteristics.

1.2 Guidance for assessing the quality of agricultural land in England and Wales is set out in the Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (1988)[1].

1.3 Agricultural land in England and Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use. The principal physical factors influencing grading are climate, site and soil which, together with interactions between them, form the basis for classifying land into one of the five grades.

1.4 Grade 1 land is excellent quality agricultural land with very minor or no limitations to agricultural use. Grade 2 is very good quality agricultural land, with minor limitations which affect crop yield, cultivations or harvesting. Grade 3 land has moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield, and is subdivided into Subgrade 3a (good quality land) and Subgrade 3b (moderate quality land). Grade 4 land is poor quality agricultural land with severe limitations which significantly restrict the range of crops and/or level of yields. Grade 5 is very poor quality land, with very severe limitations which restrict use to permanent pasture or rough grazing.

1.5 Land which is classified as Grades 1, 2 and 3a is defined in paragraph 3.54 of Planning Policy Wales as the best and most versatile (BMV) agricultural land, which should be conserved as a finite resource for the future. Paragraph 3.55 goes on the state that considerable weight should be given to protecting BMV land from development because of its special importance, and that it should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable, or if available lower grade land has a recognised environmental value.

[1] **MAFF (1988).** *Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land*. MAFF Publications.

1.6 Natural Resources Wales published a Predictive ALC map in 2017. The map is designed on a 50m grid. Criteria including climate, slope, soil wetness, droughtiness and stone contents have been considered and used to determine the most likely limitation to agricultural land quality within each grid square.

1.7 The Predictive ALC map shows the site to be primarily of Grade 1 in the north and of roughly equal proportions of Subgrade 3b and Grade 4 to the south.

2 Site and climatic conditions

General features, land form and drainage

2.1 The site extends to approximately 35ha. Agricultural land at the site is mainly in arable use in the north and under grass in the south. A small area of non-agricultural land in the west comprises a small barn and access track.

2.2 The site is bounded to the east and west by the settlements of Caldicot and Rogiet respectively; the M48 to the north; and a railway between Caldicot and Newport to the south. Around 7.5ha of land at the site is separated from the main parcel by Rogiet Road.

2.3 The topography is level to gently sloping in the south at around 10m above Ordnance Datum (AOD). There is a gentle upward slope to the northern site boundary where the altitude reaches around 15m AOD. Drainage of the site is via a number of ditches in the south which direct water to a series of reens that drain into the Severn Estuary. There are no topographic or gradient limitations to agricultural land quality at the site.

Agro-climatic conditions

2.4 Agro-climatic data for the site have been interpolated from the Meteorological Office's standard 5km grid point dataset and are given in Table 1. The site has a wet and warm climate with moderate crop moisture deficits. The number of Field Capacity Days (FCD) is large and is unfavourable for providing opportunities for agricultural field work. However, there is no overriding climatic limitation at the site.

Table 1: Local agro-climatic conditions

Parameter	Measurement
National Grid Reference	ST46808800
Altitude	10m AOD
Average Annual Rainfall	917mm
Accumulated Temperatures >0°C	1,534 day°
Field Capacity Days	193 days
Average Moisture Deficit, wheat	95mm
Average Moisture Deficit, potatoes	85mm

Soil parent material and soil type

2.5 The principal underlying geology mapped by the British Geological Survey[2] is a sandstone-dominant unit of the Mercia Mudstone Group. Pockets of the Hunts Bay Oolite Subgroup of the Pembroke Limestone Group are mapped at the northern boundary of the site and include limestones with calcite mudstones.

2.6 Superficial tidal flat deposits are mapped across the low-lying southern part of the site and comprise unconsolidated sediment of mud and/or sand. River terrace deposits of sand and gravel are mapped centrally within the site.

2.7 The Soil Survey of England and Wales soil association mapping[3] (1:250,000 scale) shows four associations at the site, of two main and contrasting types. The main soils across the north are of the Escrick 2 association which is characterised by deep, often reddish, coarse loamy soils. Profiles are well drained of Wetness Class (WC) I. A small area of the East Keswick 3 association is mapped in the northern field parcel and comprises fine loamy soils which are often deep, but locally shallower, over limestone. Profiles are also well drained, of WC I.

2.8 The contrasting Newchurch 1 association is mapped across much of the south. Developed in marine deposits, profiles are mainly calcareous clays. The soils are moderately permeable but are usually waterlogged by groundwater for long periods in winter (WC IV).

2.9 The Midelney association is mapped in the south-west of the site and includes stoneless clayey soils, often overlying peat. Profiles are waterlogged for long periods due to slow permeability and high groundwater, and may be of WC IV or V[4].

[2] **British Geological Survey (2020).** *Geology of Britain viewer*, http://mapapps.bgs.ac.uk/geologyofbritain/home.html

[3] **Soil Survey of England and Wales (1984).** *Soils of Wales* (1:250,000), Sheet 2

[4] **Rudeforth et al (1984).** *Soils and Their Use in Wales.* Soil Survey of England and Wales Bulletin 11, Harpenden.

3 Agricultural land quality

Soil survey methods

3.1 Thirty-six soil profiles were examined using an Edelman (Dutch) or gauge auger at an observation density of one per hectare in accordance with the established recommendations for ALC surveys. Two observation pits were also excavated to examine subsoil structures. The locations of observations are shown on Figure RAC8808-1. At each observation point the following characteristics were assessed for each soil horizon up to a maximum of 120cm or any impenetrable layer:

- soil texture;
- significant stoniness;
- colour (including localised mottling);
- consistency;
- structural condition;
- free carbonate; and
- depth.

3.2 The ground conditions at the site at the time of survey were very dry, there having been little rainfall during the preceding month. A gauge auger was therefore used to observe many of the profiles in locations in which soil cores could not be extracted with the Edelman auger. Soils which were impenetrable to gauge auger due to sub-surface stone have been estimated to be moderately stony in subsoil horizons.

3.3 Three topsoil samples were submitted for laboratory determination of particle size distribution, pH, organic matter content and nutrient contents (P, K, Mg). Results are presented in Appendix 1.

3.4 Soil Wetness Class (WC) was inferred from the matrix colour, presence or absence of, and depth to, greyish and ochreous gley mottling, and slowly permeable subsoil layers at least 15cm thick, in relation to the number of FCD at the location.

3.5 Soil droughtiness was investigated by the calculation of moisture balance equations (given in Appendix 2). Crop-adjusted Available Profile Water (AP) is estimated from texture, stoniness and depth, and then compared to a calculated moisture deficit (MD) for the standard crops, wheat

and potatoes. The MD is a function of potential evapotranspiration and rainfall. Grading of the land can be affected if the AP is insufficient to balance the MD and droughtiness occurs.

Agricultural land classification and site limitations

3.6 Assessment of land quality has been carried out according to the revised ALC guidelines (1988)[11]. Soil profiles have been described according to Hodgson (1997)[5] which is the recognised source for describing soil profiles and characteristics according to the revised ALC guidelines.

3.7 There are three main soil types present at the site, photographs of which are included in Appendix 3.

3.8 The predominant soil type occurs across approximately three-quarters of the site. The topsoil is mainly medium sandy loam with some loamy sands. The topsoil is dark brown or brown (7.5YR3/2-3/4 or 7.5YR4/2 in the Munsell soil colour charts[6]) and is slightly stony, typically at around 5% stone by volume. The topsoil has a fine to medium subangular blocky structure and includes common roots.

3.9 Upper subsoil is similarly of sandy loam or loamy sand. The upper subsoils are mainly brown with some dark brown and dark greyish brown (including 7.5YR3/3, 7.5YR4/3, 10YR4/2 and 10YR4/3). Stone content is slight to moderate at 10% to 20%, comprising hard stones. The subsoil has a weak fine subangular blocky to crumb structure. Ochreous mottles are commonly observed in the subsoil and indicate that the soils experience periods of intermittent waterlogging, potentially due to groundwater flux as the profiles are inherently well drained.

3.10 Where able to be observed, lower subsoil continues to be similar to the upper subsoil, comprising sandy loam or loamy sand which is dark brown or brown (7.5YR3/4 or 4/3) and often mottled. The stone content is estimated to increase to around 20% by volume.

3.11 Although mottled, the profiles are not gleyed and, as they comprise coarse textures throughout, are assessed as WC I, although it is acknowledged that the subsoils may be wetter in winter months. Profiles which comprise sandy loam throughout and which only become increasingly stony with depth have little to no limitation to their agricultural use and are classified as Grade 1.

---

[5] **Hodgson, J. M. (Ed.) (1997).** *Soil survey field handbook.* Soil Survey Technical Monograph No. 5, Silsoe.

[6] **Munsell Color (2009).** *Munsell Soil Color Book*. Grand Rapids, MI, USA

3.12 Profiles which are slightly stony but which include coarser, loamy sand textures are slightly droughty due to a reduced ability to retain water compared with sandy loam and are limited by droughtiness to Grade 2.

3.13 Profiles with a greater proportion of loamy sand and those in which stone content increases at shallower depth are limited more severely by droughtiness to Subgrade 3a.

3.14 The second soil type is identified north of Rogiet Road and also includes dark brown (7.5YR3/3 or 3/4) sandy clay loam or sandy loam topsoil of around 24cm average depth. Stone content is low at 2% to 3% by volume. One profile was observed in which an upper subsoil similar to the topsoil is present, albeit with the inclusion of ochreous mottles and around 5% stone.

3.15 Lower subsoil was observed in two locations and comprises heavier textures of heavy clay loam or sandy clay. The subsoil is brown to reddish brown (7.5YR4/3-5/3 or 5YR4/3) and is mottled. Permeability reduces with depth such that the profiles are assessed as WC III. Soils of this type are limited by wetness and workability to Subgrade 3a.

3.16 Between Observations 35 and 36, north of Rogiet Road, there is a localised area of increased topsoil stoniness amongst which are some stones that are much larger than is typical at the site.

3.17 The third soil type is identified in the south and south-west of the site within an area mapped as Flood Zone 3. At the time of survey the area was all under grass. The topsoil is stoneless to very slightly stony clay which is very dark or dark grey or greyish brown (10YR3/1, 10YR4/1, 10YR3/2 or 10YR4/2). The soil forms medium angular blocky peds which are well developed in the root zone, although orange mottles are observed around roots. The topsoil is non-calcareous and occasionally organic.

3.18 Upper subsoil is dark grey to dark greenish grey (10YR4/1 to 10Y4/1) clay. The clay is very firm and strongly developed, forming distinct very coarse angular blocks. Distinct ochreous mottles are common; the upper subsoil is gleyed and slowly permeable. The upper subsoil is variably calcareous and free of stones.

3.19 Lower subsoil continues to be of greyish clay which was occasionally observed to be moist and plastic. The structure continues to be coarse angular to prismatic. Ochreous mottles are commonly prominent. The lower subsoil is also gleyed and slowly permeable. Profiles are of WC IV which, with heavy clay loam or clay topsoil results in a wetness and workability limitation to Grade 4.

3.20 A small area roughly central within the site is also assessed as Grade 4. The land slopes downward slightly to the field corner where the vegetation is characterised by reeds, indicating persistent poor drainage.

3.21 The areas of each ALC grade at the site are given in Table 2 and their distribution is shown in Figure RAC8808-2.

Table 2: Agricultural land classification

Grade	Description	Area (ha)	%
Grade 1	Excellent quality	6.5	19
Grade 2	Very good quality	4.3	12
Subgrade 3a	Good quality	13.7	40
Grade 4	Poor quality	10.1	29
	Total Agricultural	34.6	100
	Non-Agricultural	0.4	-

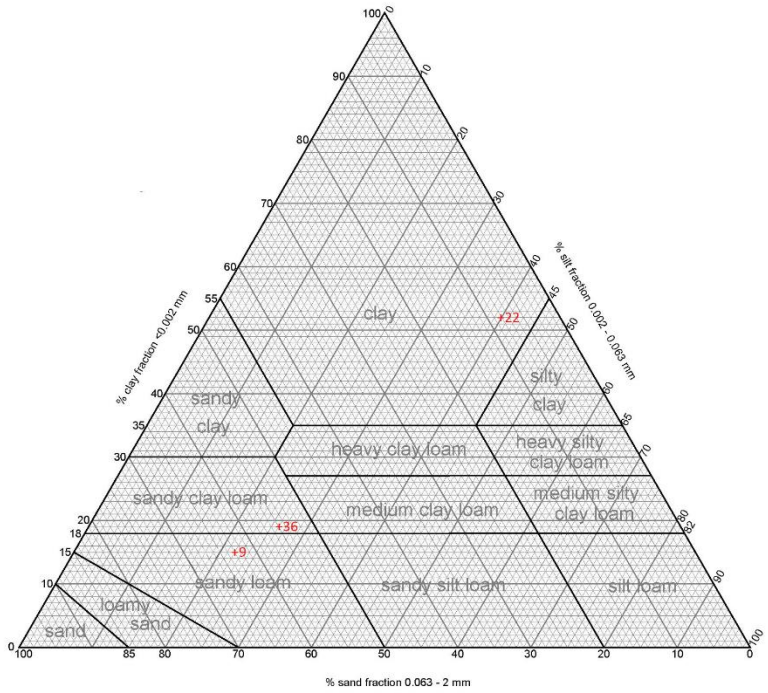
Appendix 1: Laboratory Data

Determinand	Site 9	Site 22	Site 36	Units
Sand 2.00-0.063 mm	63	8	55	% w/w
Silt 0.063-0.002 mm	22	40	26	% w/w
Clay <0.002 mm	15	52	19	% w/w
Organic Matter	2.0	8.7	4.3	% w/w
Texture	Sandy Loam	Clay	Sandy Clay Loam	

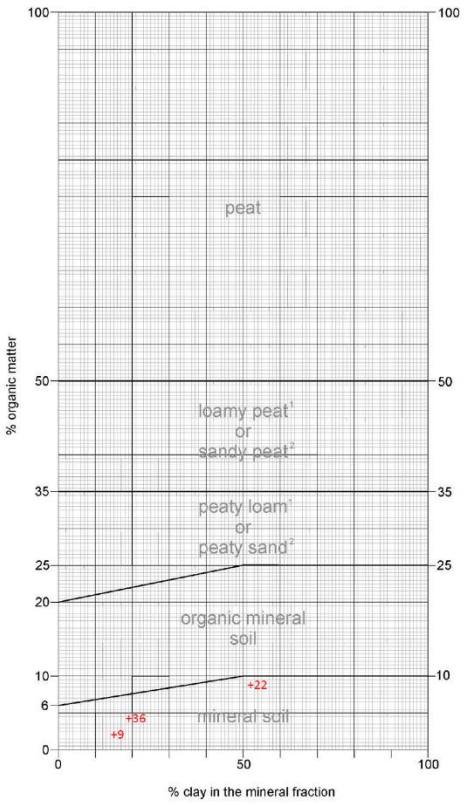
Determinand	Site 9	Site 22	Site 36	Units
Soil pH	6.8	5.9	5.6	
Phosphorus (P)	36.2	7.8	13.8	Mg/l (av)
Potassium (K)	41.9	275	54.0	Mg/l (av)
Magnesium (Mg)	66.4	303	86.8	Mg/l (av)

Determinand	Site 9	Site 22	Site 36	Units
Phosphorus (P)	3	0	1	ADAS Index
Potassium (K)	0	3	0	ADAS Index
Magnesium (Mg)	2	5	2	ADAS Index

Soil Texture by Particle Size Analysis



Organic Matter Class



[1] Less than 50% sand in the mineral fraction

[2] 50% sand or more in the mineral fraction

Appendix 2: Soil Profile Summaries and Droughtiness Calculations

Wetness calculations are made according to the methodology given in Appendix 3 of the ALC guidelines, MAFF 1988

Droughtiness calculations are made according to the methodology given in Appendix 4 of the ALC guidelines, MAFF 1988.

Grades are shown for drought, wetness and any other soil or site factors which are relevant. The overall Grade is set by the most limiting factor and shown on the right.

Stone types		
%	TAv	EAv
hard	1	0.5
.		

Climate Data	
MDwheat	95
MDpotato	85
FCD	193

Wetness Class Guidelines	*II*	*III*	*IV*	*V*
SPL within 80cm, gleying within 40cm		>52cm	<52cm	
SPL within 80cm, gleying at 40-70cm	>70cm	<70cm		
No SPL but gleying within 40cm	coarse subsoil	*I*	other cases	*II*

hard flint & pebble

Maximum depth of auger penetration is underlined

Site No.		Depth cm		Texture	$CaCO_3$	Colour	Mottle colour	abund-ance	stone% hard	stone% .	Struct-ure	APwheat mm	AP potato mm	Gley	SPL	WC	Wetness grade WE	Final Grade	Limiting Factor(s)
1	T	0	28	mSL		7.5YR3/2			5		-	45	45	n	n	*I*	1	**2**	DR
		28	35	LmS		10YR4/2			10			6	6	n	n				
		35	50	LmS		10YR4/2			10			12	12	n	n				
		50	120	LmS					10			39	16	n	n				
											Total	**102**	**79**						
											MD	7	-6						
									Droughtiness grade (DR)			2	2						
2	T	0	22	mSL		7.5YR3/2			5			36	36	n	n	*I*	1	**2**	DR
		22	45	LmS		10YR4/2			10			19	19	n	n				
		45	50	mSL		7.5YR4/3	Fe	com.	20			6	6	n	n				
		50	120	mSL		7.5YR4/3	Fe	com.	20			63	24	n	n				
											Total	**123**	**84**						
											MD	28	-1						
									Droughtiness grade (DR)			2	2						
3	T	0	24	mSL		7.5YR4/2			2			40	40	n	n	*I*	1	**1**	

		24	35	mSL	10YR4/3	Fe	com	15		14	14	n	n					
		35	50	mSL	10YR4/3	Fe	com	15		19	19	n	n					
		50	120	mSL				20		63	24	n	n					
									Total	**136**	**97**							
									MD	41	12							
									Droughtiness grade (DR)	1	1							
4	T	0	28	mSL	7.5YR4/2			2		47	47	n	n	/	1	**2**	DR	
		28	48	mSL	7.5YR4/3	Fe	com	15		26	26	n	n					
		48	50	LmS	7.5YR3/4	Fe	com	20		1	1	n	n					
		50	120	LmS	7.5YR3/4			20		35	14	n	n					
									Total	**109**	**88**							
									MD	14	3							
									Droughtiness grade (DR)	2	2							
5	T	0	25	mSL	7.5YR4/2			5		47	40	n	n	/	1	**3a**	DR	
		25	30	mSL	7.5YR4/2			15		6	6	n	n					
		30	45	mSL	7.5YR3/4	Fe	com	20		18	18	n	n					
		45	120	mSL				20		69	30	n	n					
									Total	**93**	**95**							
									MD	-2	10							
									Droughtiness grade (DR)	3a	2							
6	T	0	28	mSL	7.5YR4/2			5		45	45	n	n	/	1	**1**		
		28	38	mSL	7.5YR3/4	Fe	com	15		13	13	n	n					
		38	45	mSL	7.5YR3/4	Fe	com	20		8	8	n	n					
		45	120	mSL				20		69	30	n	n					
									Total	**135**	**96**							
									MD	40	11							
									Droughtiness grade (DR)	1	1							
7	T	0	26	mSL	7.5YR4/2			5		42	42	n	n	/	1	**1**		

		26	45	mSL	7.5YR4/3	Fe	com	10		26	26	n	n						
		45	50	mSL	7.5YR4/3	Fe	com	20		6	6	n	n						
		50	120	mSL	7.5YR4/3	Fe	com	20		63	24	n	n						
									Total	**137**	**98**								
									MD	42	13								
									Droughtiness grade (DR)	1	1								
8	T	0	25	mSL	7.5YR4/2			5		40	40	n	n	/	1	**1**			
		25	30	mSL	7.5YR4/3	Fe	com	10		7	7	n	n						
		30	50	mSL	7.5YR4/3	Fe	com	20		24	24	n	n						
		50	120	mSL				20		63	24	n	n						
									Total	**134**	**95**								
									MD	39	10								
									Droughtiness grade (DR)	1	1								
9	T	0	32	mSL	7.5YR4/2			5		52	52	n	n	/	1	**2**	DR		
		32	50	LmS	10YR3/3	Fe	com	15		14	14	n	n						
		50	120	LmS	10YR3/3	Fe	com	15		37	15	n	n						
									Total	**102**	**81**								
									MD	7	-4								
									Droughtiness grade (DR)	2	2								
10	T	0	28	mSL	7.5YR4/2			3		46	46	n	n	/	1	**3a**	DR		
P1		28	40	LmS	7.5YR3/3	Fe	com	25		8	8	n	n						
		40	120	LmS	7.5YR3/3	Fe	com	25		40	20	n	n						
									Total	**94**	**75**								
									MD	-1	-10								
									Droughtiness grade (DR)	3a	3a								
11	T	0	28	mSL	7.5YR4/2			3		46	46	n	n	/	1	**3a**	DR		
		28	30	LmS	7.5YR3/3	Fe	com	25		1	1	n	n						
		30	120	LmS				25		47	27	n	n						

							Total	**94**	**75**						
							MD	-1	-10						
						Droughtiness grade (DR)		3a	3a						
12	T	0	20	LmS	7.5YR3/2	8		24	24	n	n	/	1	**3a**	DR
		20	50	LmS	7.5YR4/2	15		23	23	n	n				
		50	120	LmS	7.5YR4/2	15		37	15	n	n				
							Total	**84**	**62**						
							MD	-11	-23						
						Droughtiness grade (DR)		3a	3a						
13	T	0	25	LmS	7.5YR3/2	8		30	30	n	n	/	1	**3a**	DR
		25	40	LmS	7.5YR4/2	15		11	11	n	n				
		40	50	LmS	7.5YR4/2	20		7	7	n	n				
		50	120	LmS	7.5YR4/2	20		35	14	n	n				
							Total	**84**	**63**						
							MD	-11	-22						
						Droughtiness grade (DR)		3a	3a						
14	T	0	28	mSL	7.5YR4/2	5		45	45	n	n	/	1	**1**	
		28	35	mSL	7.5YR4/3	15		9	9	n	n				
		35	50	mSL	7.5YR4/3	15		19	19	n	n				
		50	120	mSL		20		63	24	n	n				
							Total	**136**	**97**						
							MD	41	12						
						Droughtiness grade (DR)		1	1						
15	T	0	30	LmS	7.5YR3/2	5		37	37	n	n	/	1	**3a**	DR
		30	40	LmS	7.5YR3/3	20		7	7	n	n				
		40	50	LmS	7.5YR3/3	20		7	7	n	n				
		50	120	LmS		20		35	14	n	n				
							Total	**86**	**66**						

									MD	-9	-19							
								Droughtiness grade (DR)		3a	3a							
16	T	0	20	oC		10YR3/1			0		46	46	n	n	*IV*	4	**4**	WE
		20	40	C	slight	10YR5/2	Fe	com	0	poor	26	26	y	y				
		40	60	C		10YR5/2	Fe	com	0	poor	20	26	y	y				
		60	120	C		10Y4/1	Fe	com	0	poor	42	13	y	y				
										Total	**134**	**111**						
										MD	39	26						
								Droughtiness grade (DR)		1	1							
17	T	0	30	C		10YR4/1			0		51	51	n	n	*IV*	4	**4**	WE
		30	45	C		10Y4/1	Fe	com	0	poor	20	20	y	y				
		45	120	C		10Y4/1	Fe	com	0	poor	56	33	y	y				
										Total	**126**	**103**						
										MD	31	18						
								Droughtiness grade (DR)		1	1							
18	T	0	30	C	slight	10YR4/2	Fe	com	0		51	51	n	n	*IV*	4	**4**	WE
		30	50	C	mod	10YR5/1	Fe	com	0	poor	26	26	y	y				
		50	120	C	slight	10Y4/1	Fe	com	0	poor	49	26	y	y				
										Total	**126**	**103**						
										MD	31	18						
								Droughtiness grade (DR)		1	1							
19	T	0	25	ZC		10YR4/2			0		43	43	n	n	*IV*	4	**4**	WE
		25	60	C		10YR4/1	Fe	com	0	poor	40	46	y	y				
		60	120	C		10YR4/1	Fe	com	0	poor	42	13	y	y				
										Total	**124**	**101**						
										MD	29	16						
								Droughtiness grade (DR)		2	1							

20	T	0	30	C		10YR4/2			0			51	51	n	n	*IV*	4	**4**	WE
		30	75	C	v. slight	10YR4/1	Fe	com	0	poor		44	52	y	y				
		75	120	C	v. slight	10YR4/1	Fe	com	0	poor		32	0	y	y				
											Total	**126**	**103**						
											MD	31	18						
										Droughtiness grade (DR)		1	1						
21	T	0	40	C		10YR4/2	Fe	com	0			68	68	n	n	*IV*	4	**4**	WE
		40	120	C		10YR4/1	Fe	com	0	poor		62	39	y	y				
											Total	**130**	**107**						
											MD	35	22						
										Droughtiness grade (DR)		1	1						
22	T	0	26	C		10YR3/2	Fe	com	0			47	47	n	n	*IV*	4	**4**	WE
P2		26	50	C		10Y4/1	Fe	com	0	poor		31	31	y	y				
		50	120	C		10Y4/1	Fe	com	0	poor		49	26	y	y				
											Total	**127**	**104**						
											MD	32	19						
										Droughtiness grade (DR)		1	1						
23	T	0	25	C		10YR3/2	Fe	com	0			45	45	n	n	*IV*	4	**4**	WE
		25	65	C		10Y4/1	Fe	com	0	poor		43	52	y	y				
		65	120	C		10Y4/1	Fe	com	0	poor		39	7	y	y				
											Total	**126**	**104**						
											MD	31	19						
										Droughtiness grade (DR)		1	1						
24	T	0	28	C		10YR3/2	Fe	com	0			50	50	n	n	*IV*	4	**4**	WE
		28	50	C		10Y4/1	Fe	com	0	poor		29	29	y	y				
		50	120	C		10Y4/1	Fe	com	0	poor		49	26	y	y				
											Total	**128**	**105**						
											MD	33	20						

								Droughtiness grade (DR)	1	1							
25	T	0	25	LmS	7.5YR3/2			5	31	31	n	n	/	1	**3a**	DR
		25	50	LmS	7.5YR3/3	Fe	com	15	19	19	n	n				
		50	120	LmS	7.5YR3/3	Fe	com	15	37	15	n	n				
								Total	**87**	**65**						
								MD	-8	-20						
								Droughtiness grade (DR)	3a	3a						
26	T	0	24	LmS	7.5YR3/2			5	30	30	n	n	/	1	**3a**	DR
		24	30	LmS	7.5YR3/3	Fe	com	20	4	4	n	n				
		30	120	LmS	7.5YR3/3	Fe	com	20	49	29	n	n				
								Total	**83**	**63**						
								MD	-12	-22						
								Droughtiness grade (DR)	3a	3a						
27	T	0	22	mSL	7.5YR4/2	Fe	few	5	36	36	n	n	/	1	**3a**	DR
		22	40	LmS	7.5YR3/3	Fe	com	20	13	13	n	n				
		40	120	LmS	7.5YR3/3	Fe	com	20	42	22	n	n				
								Total	**91**	**70**						
								MD	-4	-15						
								Droughtiness grade (DR)	3a	3a						
28	T	0	35	mSL	7.5YR3/3	Fe	few	3	58	58	n	n	/	1	**1**	
		35	45	mSL	7.5YR4/3	Fe	com	15	13	13	n	n				
		45	120	mSL	7.5YR4/3	Fe	com	15	73	32	n	n				
								Total	**143**	**102**						
								MD	48	17						
								Droughtiness grade (DR)	1	1						
29	T	0	26	mSL	7.5YR3/3	Fe	few	3	43	43	n	n	/	1	**1**	
		26	30	mSL	7.5YR4/3	Fe	com	15	5	5	n	n				

		30	120	mSL				15		92	51	n	n						
									Total	**140**	**99**								
									MD	45	14								
									Droughtiness grade (DR)	1	1								
30	T	0	35	mSL	7.5YR3/3			3		58	58	n	n	*I*	1	**1**			
		35	45	mSL	7.5YR4/3	Fe	com	15		13	13	n	n						
		45	120	mSL	7.5YR4/3	Fe	com	15		73	32	n	n						
									Total	**143**	**102**								
									MD	48	17								
									Droughtiness grade (DR)	1	1								
31	T	0	24	mSL	7.5YR3/3			3		40	40	n	n	*I*	1	**2**	DR		
		24	30	mSL	7.5YR4/3	Fe	com	20		7	7	n	n						
		30	120	mSL				20		87	48	n	n						
									Total	**134**	**95**								
									MD	39	10								
									Droughtiness grade (DR)	1	2								
32	T	0	26	mSL	7.5YR3/3			3		43	43	n	n	*III*	3a	**3a**	WE		
		26	60	mSL	7.5YR4/3	Fe	com	5		45	48	n	n						
		60	80	SC	7.5YR4/3-5/3	Fe	com	1	poor	16	13	y	y						
		80	120	SC	7.5YR4/3-5/3	Fe	com	1	poor	32	0	y	y						
									Total	**135**	**104**								
									MD	40	19								
									Droughtiness grade (DR)	1	1								
33	T	0	24	mSL	7.5YR3/3			3		43	43	n	n	*III*	3a	**3a**	WE		
		24	60	mSL	7.5YR4/3	Fe	com	5		45	48	n	n						
		60	120	SC				1	poor	16	13	y	y						
									Total	**135**	**104**								
									MD	40	19								

								Droughtiness grade (DR)		1	1							
34	T	0	26	SCL	7.5YR3/4			2		43	43	n	n	///	3a	**3a**	WE	
		26	50	hCL	5YR4/3	Fe	com	2	m/poor	38	38	n	n					
		50	120	hCL	5YR4/3	Fe	com	2	poor	69	31	n	y					
									Total	**150**	**112**							
									MD	55	27							
								Droughtiness grade (DR)		1	1							
35	T	0	20	SCL	7.5YR3/4			2		33	33	n	n	///	3a	**3a**	WE	
		20	26	SCL	5YR4/3	Fe	com	2		9	9	n	n					
		26	60	hCL					m/poor	48	54	n	n					
		60	120	hCL					poor	42	12	n	y					
									Total	**133**	**109**							
									MD	38	24							
								Droughtiness grade (DR)		1	1							
36	T	0	25	SCL	7.5YR3/4			2		42	42	n	n	///	3a	**3a**	WE	
		25	60	SCL	5YR4/3	Fe	com	2		47	51	n	n					
		60	120	hCL					poor	42	12	n	y					
									Total	**130**	**105**							
									MD	35	20							
								Droughtiness grade (DR)		1	1							

Appendix 3: Site Photographs



Pit 1



Pit 1 Topsoil



Pit 1 Subsoil



Clay Subsoil at Ob 18



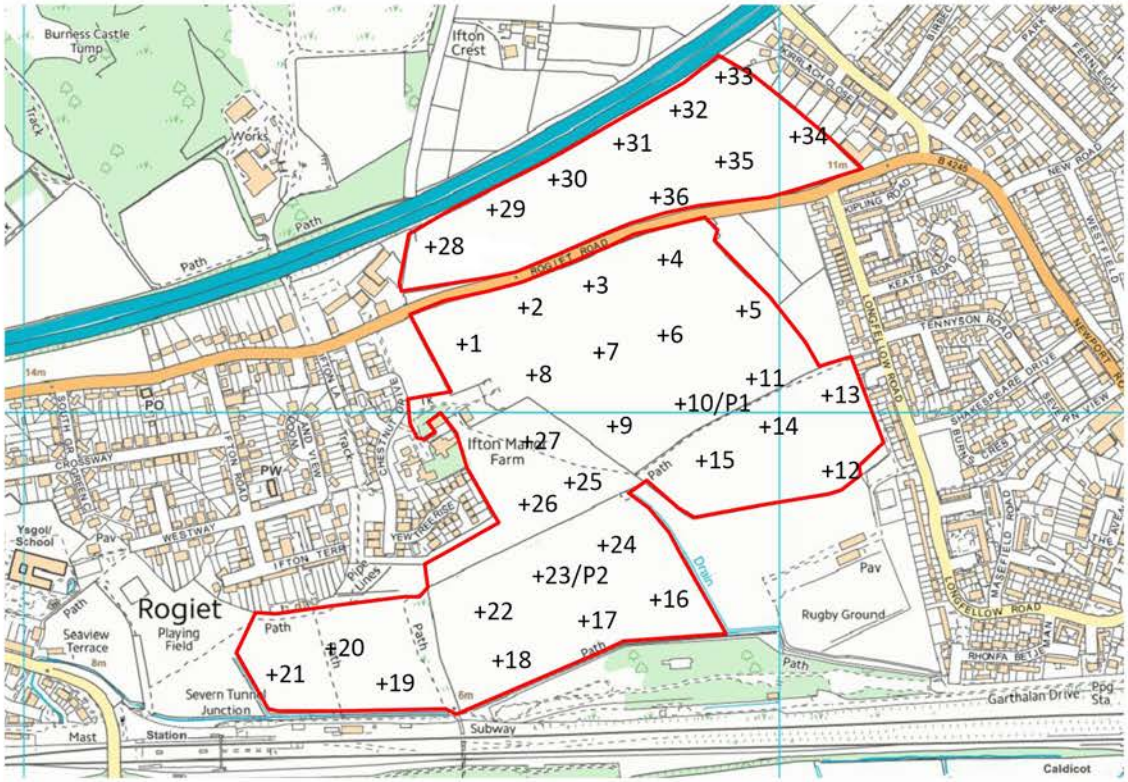
Pit 2



Pit 2 Topsoil



Pit 2 Subsoil



Survey Area

+1 Auger Observation

.P1 Pit Observation

N

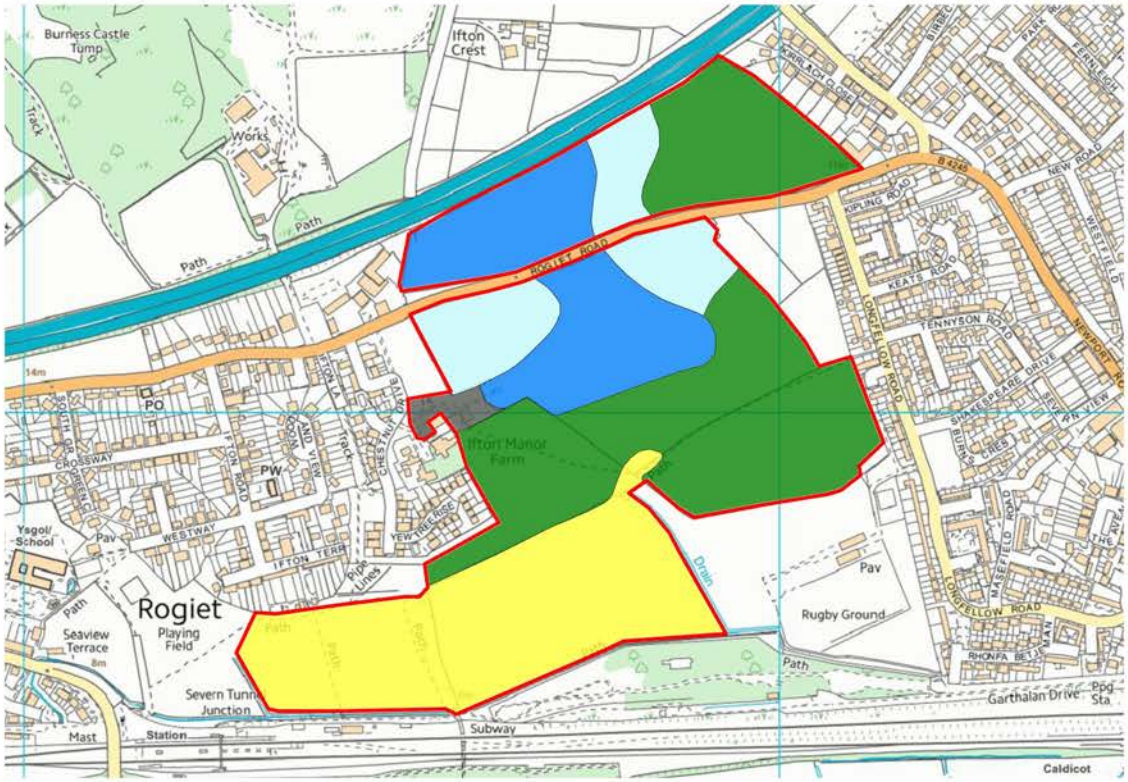
Plan reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office. Crown Copyright Reserved.
Ordnance Survey Copyright License Number: 100005584

Scale 1:10,000@A4 July/2020

Figure	RAC8808-1: Observations
Site:	Ifton Manor Farm, Caldicot
Client:	Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals

READING AGRICULTURAL CONSULTANTS

© Copyright Reading Agricultural Consultants, 2020. Beechwood Court, Long Toll, Woodcote, Reading, RG8 0RR. Tel: 01491 684233. www.reading-ag.com



Grade 1 - excellent quality	Best and most versatile land
Grade 2 - very good quality	
Subgrade 3a - good quality	
* Not Present	
* Subgrade 3b - moderate quality	
Grade 4 - poor quality	
* Grade 5 - very poor quality	
Non-agricultural	

N

Plan reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office. Crown Copyright Reserved.
Ordnance Survey Copyright License Number: 100005584

Scale 1:10,000@A4 July/2020

Figure	RAC8808-2: Agricultural Land Classification
Site:	Ifton Manor Farm, Caldicot
Client:	Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals

READING AGRICULTURAL CONSULTANTS

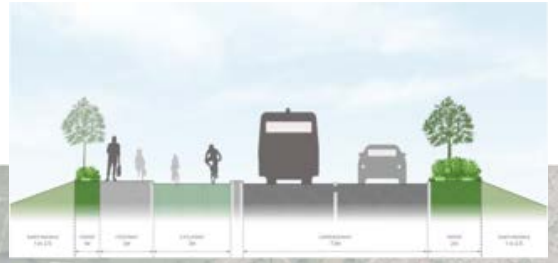
© Copyright Reading Agricultural Consultants, 2020. Beechwood Court, Long Toll, Woodcote, Reading, RG8 0RR. Tel: 01491 684233. www.reading-ag.com

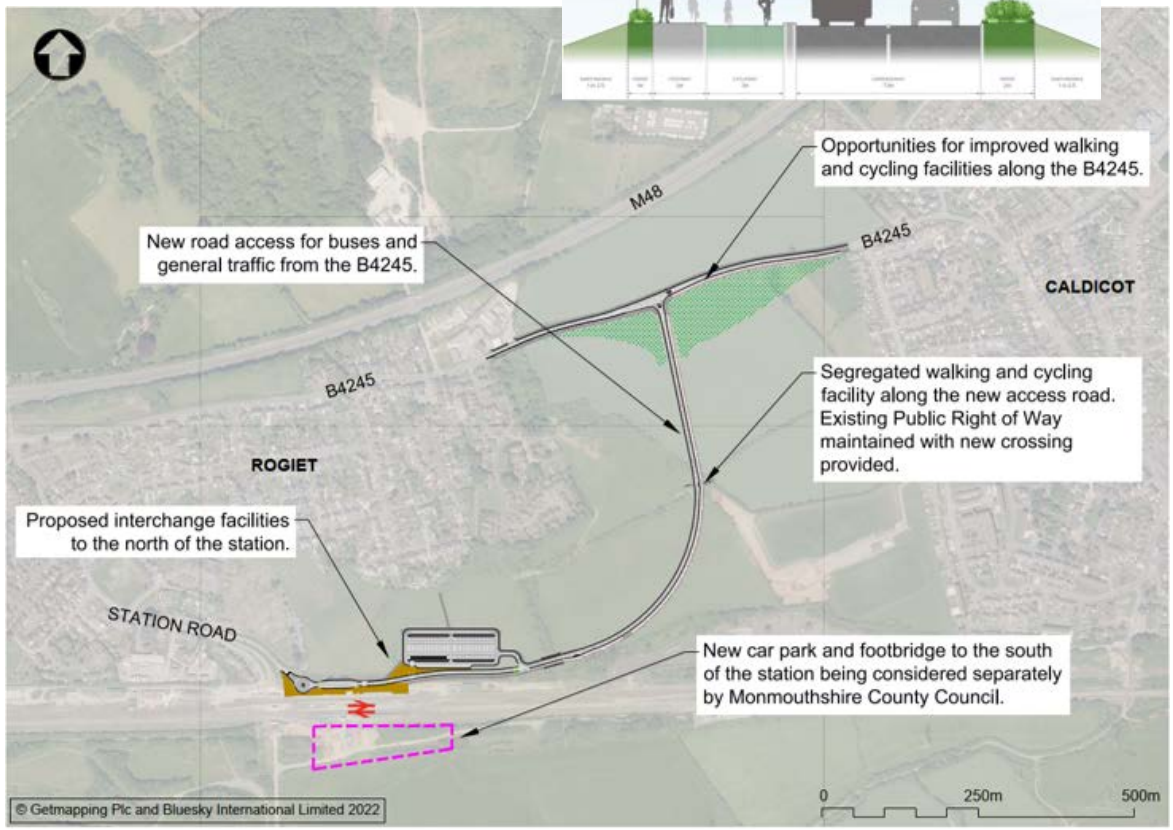
Appendix D:
Severn Tunnel Junction Station with Enhancements to Station Road

Option 1: B4245 Link to Severn Tunnel Junction station with enhancements to Station Road

This option would see the development of a new access route to the station from the B4245 Rogiet Road, and improvements to Station Road to provide enhanced access / egress for buses, pedestrians and cyclists.

B4245 Link to Severn Tunnel Junction station





Station Road Improvements

Further works to improve Station Road could be considered to enhance access / egress to the station for bus, walking and cycling. This could include footway improvements and a review of car parking arrangements.



Pros:

- Allows users to switch easily between rail, bus, walking, cycling and car
- Good links with existing and proposed pedestrian and cycling networks – the designs tie into future aspirations for the local walking and cycling networks
- Improves journey times for trips to the station (particularly from the east)
- Supports use of the station for park and ride
- Station Road could be used to provide an access loop with the new link road to maximise benefit for bus access and patronage

Cons:

- No link to the strategic road network (motorways and A-roads)
- Challenges along Station Road such as pinch points, on-street parking and poor vehicular access to the station

Appendix E:
ALDP Housing Delivery Table

Strategic Site	Number of Homes Site Allocated For	Outline Application Reference Number	Outline Application Submission Date	Outline Application Approval Date	Reserved Matters Application Reference	First Reserved Matters Submission Date	Reserved Matters Approval Date	Years between Submission of First Planning Application and Compeltion of Home
Deri Farm, Abergavenny	250	DC/2014/01360	11/11/2014	19/01/2018				4
Crick Road, Portskewett	285	DM/2018/00696	27/04/2018	30/03/2019	DM/2019/01629	04/10/2019	26/02/2020	6
Fairfield Mabey, Chepstow	350	DC/2014/01290	27/10/2014	27/11/2017	DM/2019/00001	21/01/2018	17/06/2019	6
Wonastow Road, Monmouth	450	DC/2013/00368	02/05/2013	19/12/2014	DC/2015/00392	30/03/2015	17/11/2015	3
Rockfield Farm, Undy	270	DC/2016/00883	27/07/2016	20/03/2018	DM/2018/01606	03/10/2018	22/02/2019	3
Vinegar Hill, Undy	225	DM/2019/01937	04/12/2019	16/06/2022	DM/2022/01042	14/07/2024	05/04/2023	4
Sudbrook Paper Mill, Sudbrook	190	DC/2015/01184	29/09/2015	11/11/2016				2

Strategic Site	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Average Annual Delivery Rate
Deri Farm, Abergavenny	0	0	32	68	83	51	0	0	234	58.5
Crick Road, Portskewett	0	0	0	0	0	0	0	14	14	14
Fairfield Mabey, Chepstow	0	0	0	0	18	88	97	114	317	79.25
Wonastow Road, Monmouth	21	66	166	74	13	0	0	0	340	68
Rockfield Farm, Undy	0	0	0	16	41	49	38	0	144	36
Vinegar Hill, Undy	0	0	0	0	0	0	0	23	23	23
Sudbrook Paper Mill, Sudbrook	0	2	33	61	28	41	0	0	165	41.25

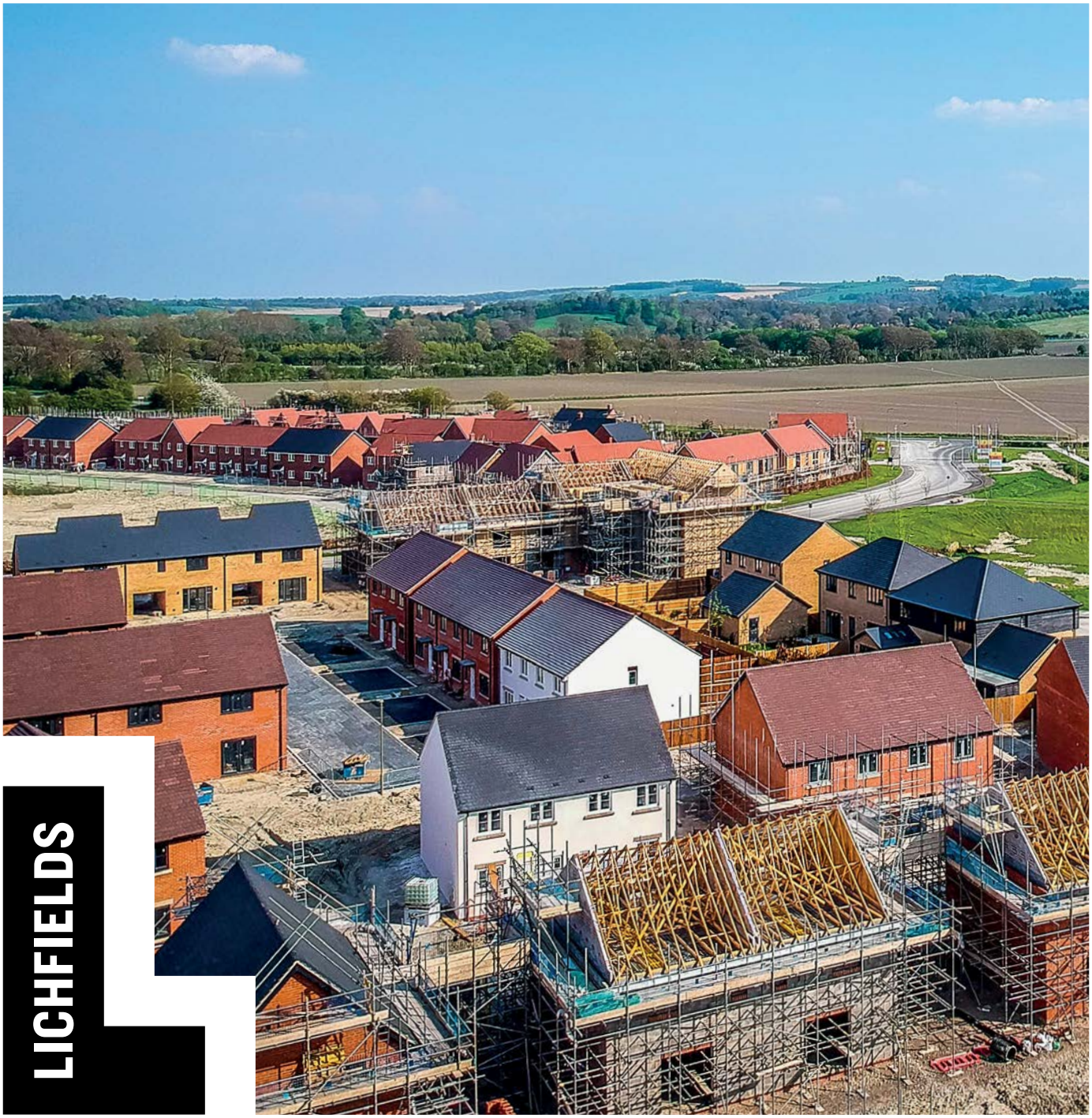
Appendix F:
‘Start to Finish – How quickly do large-scale housing sites deliver?’
Third Edition, Lichfields
March 2024

INSIGHT
MARCH 2024

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION



LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk



Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). As we approach a general election, and with no end to the housing crisis, the boosting of housing delivery to achieve 300,000 homes per annum through a new generation of Local Plans (prepared under the Levelling Up and Regeneration Act) faces renewed focus. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites, which – with our enlarged sample – now considers real-world implementation across 179 sites of over 500 dwellings.

We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.
2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and increased mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a price consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 - 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.

Key figures

297 sites assessed, with a combined yield of 387k+ dwellings; 179 of the sites delivering 500+ dwellings

9 solely apartment schemes in urban areas assessed, with a combined yield of 5,300+ units

6.7 median years from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings

100-188 dpa average annual build-out rate range for schemes of 2,000+ dwellings[1]

44-83 dpa average annual build-out rate range for scheme of 500-999 dwellings[2]

34% quicker[3] to deliver greenfield sites of 500 or more units than their brownfield counterparts

69 dpa average completion per outlet on sites with one outlet, dropping to 62 dpa for two outlets, and 55 dpa for three outlets

3x longer planning to delivery periods for brownfield apartment schemes of 500-999 units compared to their conventional housing counterparts

[1] Range is from the lower quartile to upper quartile figures

[2] As above

[3] This is based on the median metric

01
Introduction

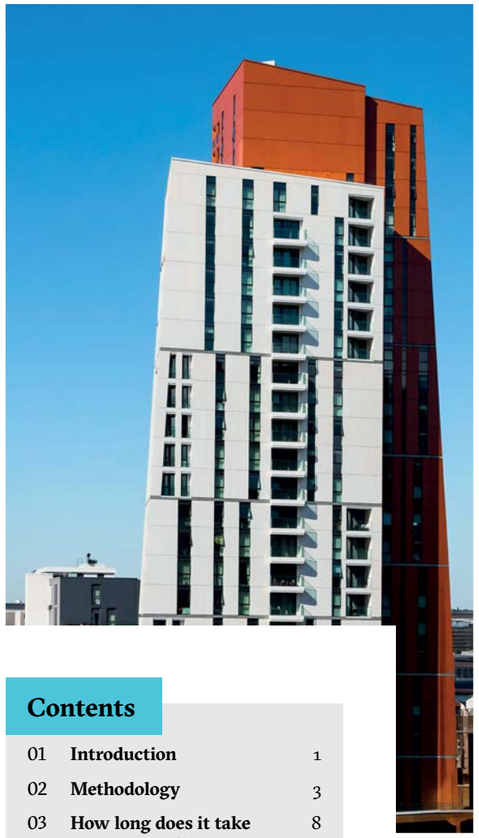
This is the third edition of Lichfields' award winning[4] research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data[5] where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform[6] including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out[7]. As of 2024, the business models of housebuilders and land promoters - and allegations of perceived 'land banking' – have received fresh examination by the Competition and Markets Authority (CMA) which published its Market Study in February 2024[8]. The CMA found that land banking is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



© Benjamin Cheng via Unsplash

Contents

01	Introduction	1
02	Methodology	3
03	How long does it take to get started?	8
04	How quickly do sites build out?	12
05	What factors can influence build-out rates?	15
06	Delivery of brownfield, urban apartment schemes	21
07	Conclusions	25

[4] The first edition was the winner of the 2017 RTPI Planning Consultancy Research Award

[5] Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

[6] Leading in due course to the August 2020 Planning White Paper: Planning for the Future

[7] Published October 2018

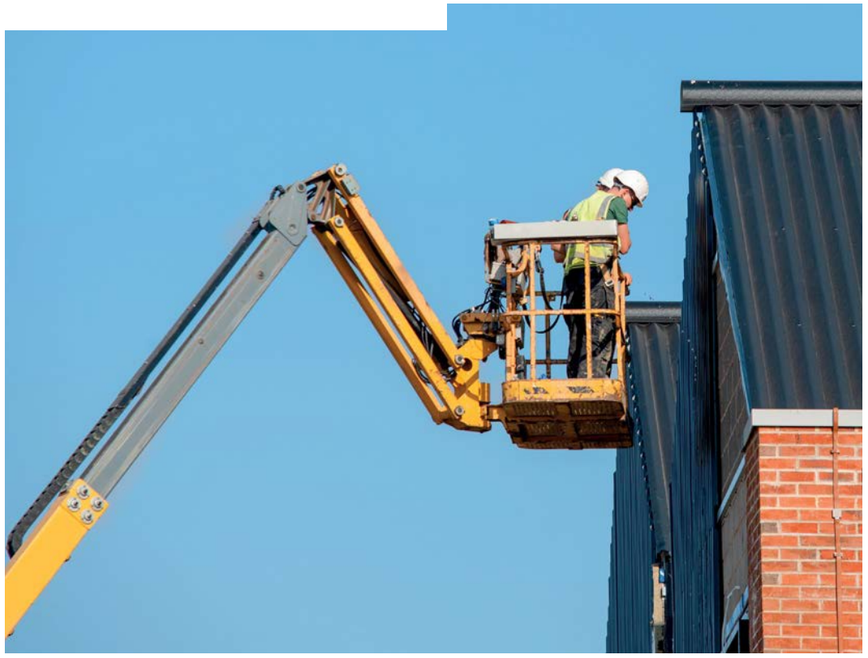
[8] https://assets.publishing.service.gov.uk/media/65d8baed6efa8300ldddcc5cd/Housebuilding_market_study_final_report.pdf

The Levelling Up and Regeneration Act ('LURA')[9] introduced new measures aimed at build-out via the use of Commencement Notices (s111), Progress Reports (s114) and Completion Notices (s112). Regulations to determine the practicalities of these measures are awaited[10] but their design and application will benefit from a sound evidence-based grasp of how strategic housing schemes are implemented.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories. This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. Recent policy shifts – increasing the focus on boosting housing supply on previously-developed sites[11] – mean it will become more important to understand the distinctive delivery profile of such schemes.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



[9] https://www.legislation.gov.uk/ukpga/2023/55/enacted

[10] The provisions require secondary legislation which, at the time of writing, has not been published and for which there is no timetable. There is also no guarantee the provisions will ever come into force. Albeit the provisions for making these regulations will come in to force on 31st March and the intentions were set out at the time the Bill was published in the supporting Further Information paper.

[11] Including the December 2023 changes to the NPPF, which clarify that the 35% uplift to the Standard Method in the 20 largest urban centres is expected to be delivered in those areas rather than in surrounding areas. In February 2024, the Secretary of State published the review into the London Plan and issued a consultation on 'Strengthening planning policy for brownfield development': https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development

02
Methodology

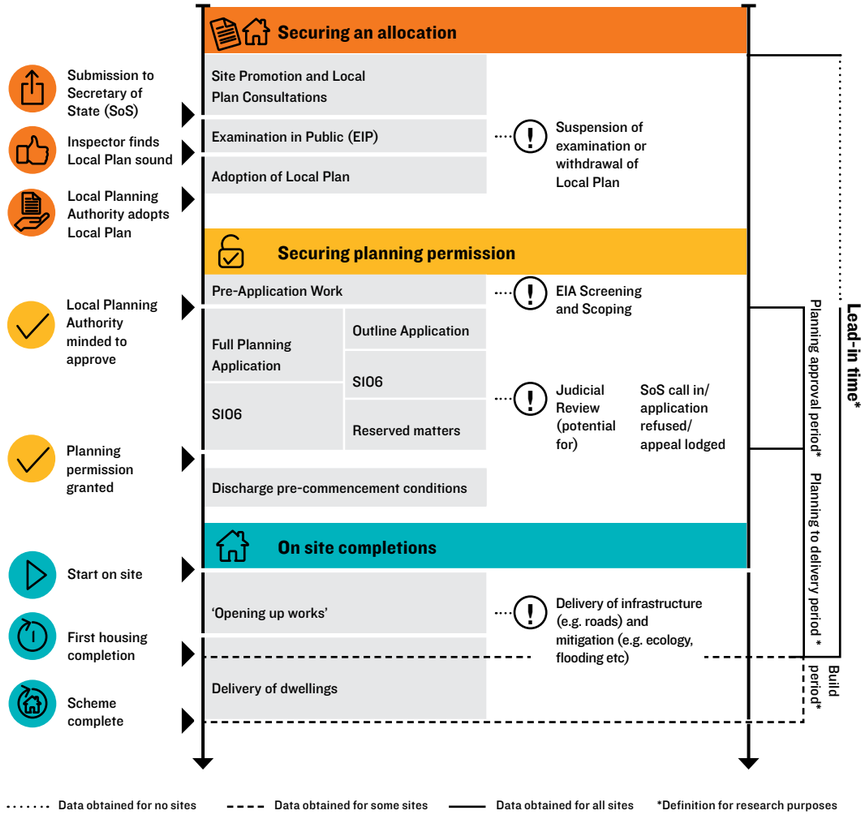
This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

Definitions

For all sites, we look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.I: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.

Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.



Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.

The sources on which we have relied to secure delivery data on all sites in this research include:

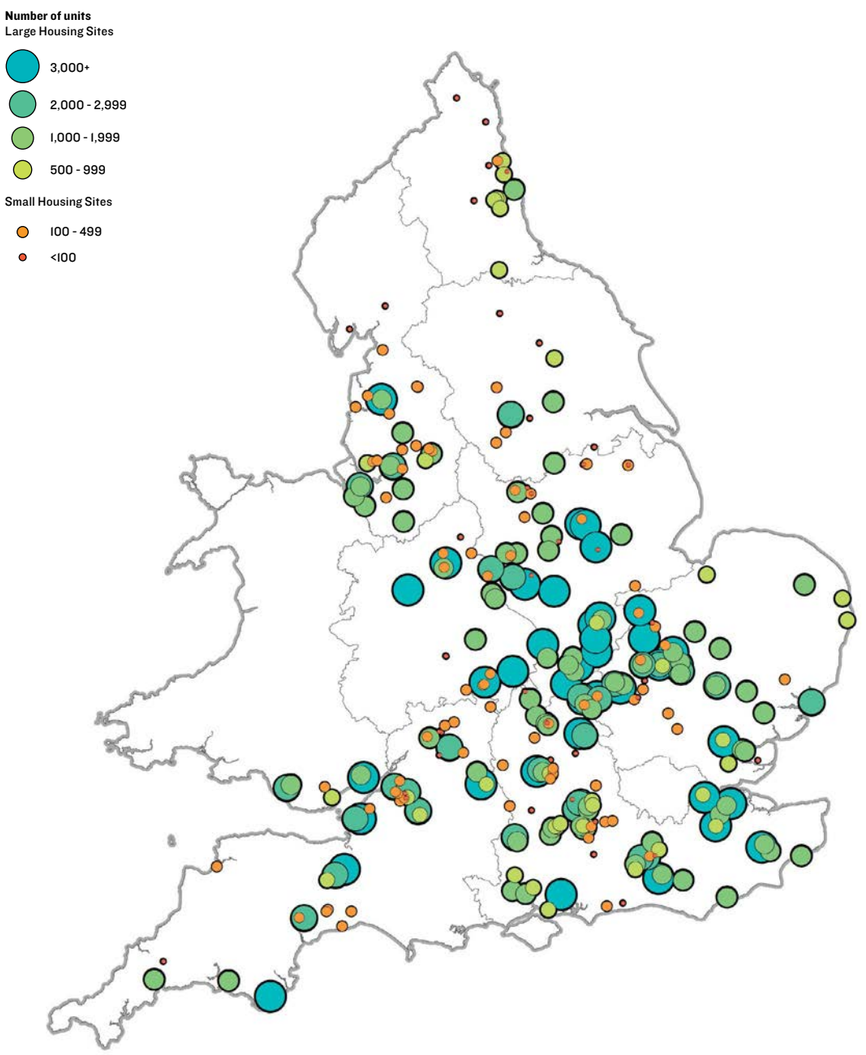
1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs[12];
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.



[12] Monitoring documents, five-year land supply reports, housing trajectories (some in land availably assessments), housing development reports and newsletters

INSIGHT
START TO FINISH

Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

03
How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

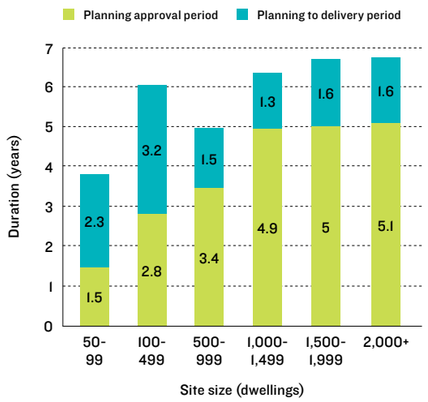
The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/ hybrid application). Our data shows that the average median planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis into the length of time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

Table 3.1 Lower quartile, median and upper quartile planning approval period (years) by site size

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.1
Median	1.5	2.8	3.4	4.9	5.0	5.1
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

The CMA go on to say in footnote 111 that *"in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years"*. This is more closely aligned to our findings on securing planning permission on a large site.

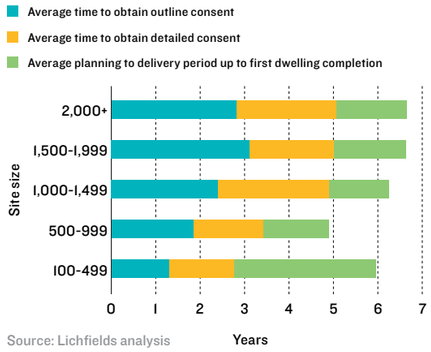
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the NPPF[13] which raised the bar on the definition of 'deliverable' for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the 'clear evidence' required to demonstrate deliverability of sites that do not benefit from a detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 - 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will on average deliver limited amounts of housing within the next five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site[14]. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

[13] February 2019

[14] CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

INSIGHT
START TO FINISH

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 - 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

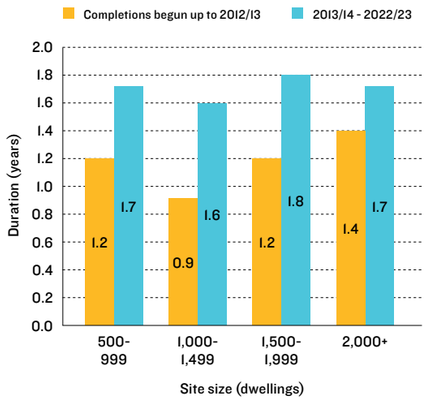
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research[15] provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 – 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF, the planning to delivery period has extended up to 1.6 - 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year period. Interestingly, sites of 100 - 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 - 7 years, despite significant variation in site size.

After this period, an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4).



[15] Lichfields, 2021 Tracking Progress

04
How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries. Whilst the pressure on LPAs to maintain a five (or four[16]) year housing land supply may be decreasing[17], the LURA contains measures that will increase scrutiny of build-out rates at the planning application stage, with the potential (at least in theory) for Completion Notices that nullify permissions when sites fall behind from their agreed delivery pace. A good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520-620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet[18], the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement[19])	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

[16] See NPPF paragraph 226

[17] See NPPF paragraph 76

[18] Ebbsfleet has delivered a series of high annual build-out rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

[19] The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

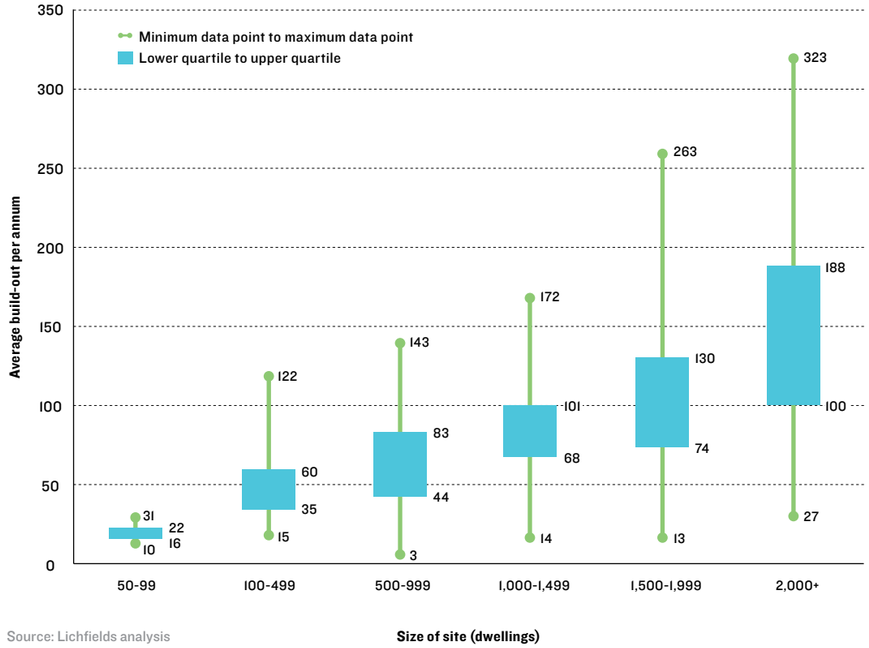
In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

100-188 dpa

average annual build-out rate on 2,000+ dwelling scheme

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

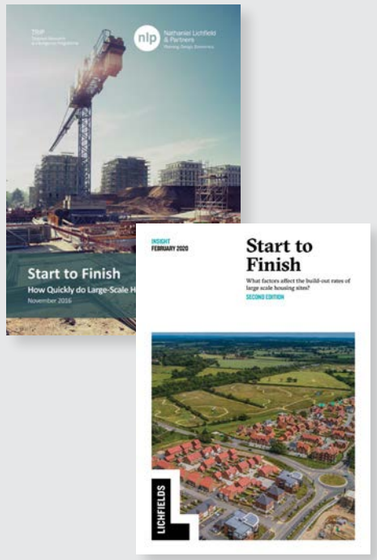


Table 4.2 Average build-out rates by size of site (dwellings) compared with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

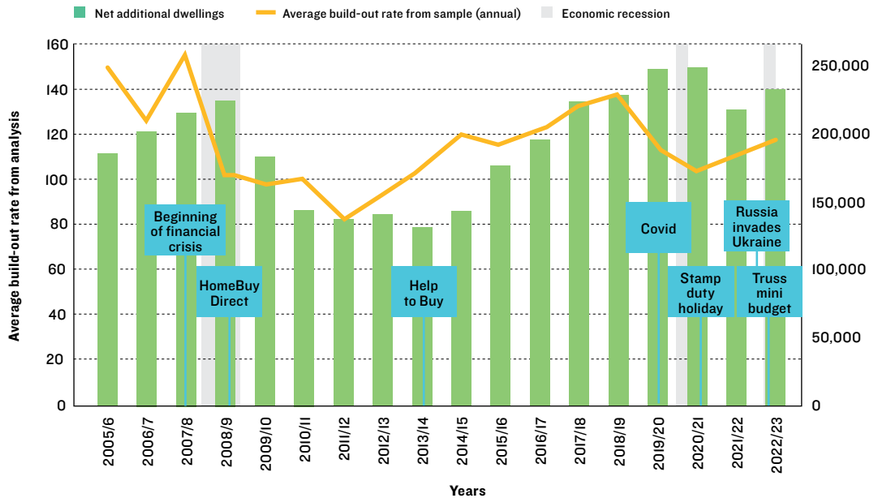
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period[20]. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.I: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table 104

[20] https://www.gov.uk/government/statistics/help-to-buy-equityloan-scheme-data-to-30-september-2021/help-to-buy-equity-loanscheme-data-to-30-september-2021#aboutthe-help-to-buy-equityloan-scheme

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) *"over half the impact from two years of interest rate increases is still to be felt"*. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF 'A New Normal for Housebuilding' forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025[21].

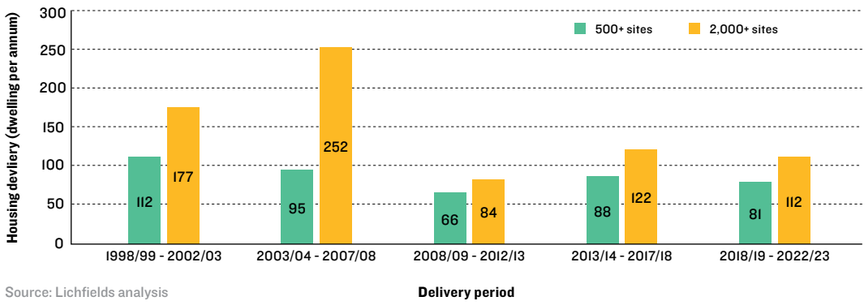
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

[21] https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024

Site specific factors

Do homes get delivered faster in high pressure areas?

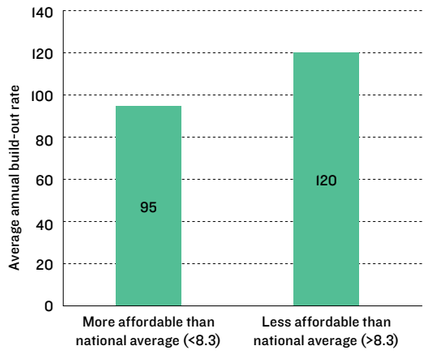
The rate at which homes can be sold (the 'absorption rate') determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government's standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas[22].

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved[23].



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordbaility ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

[22] This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were 'more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were 'less affordable than the national average (>8.72) at 126 dpa

[23] Using ONS long term affordability data https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022#:~:text=In%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings

34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Housing mix and variety

The Letwin Review[24] posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build-out. It concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10- 19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

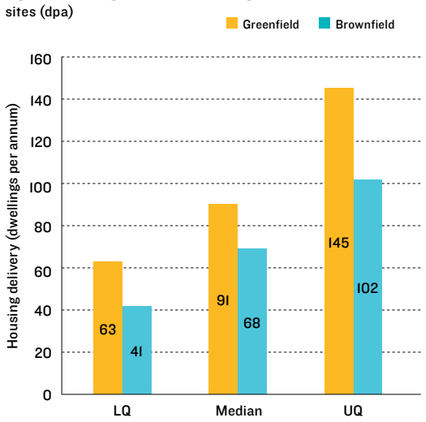
Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

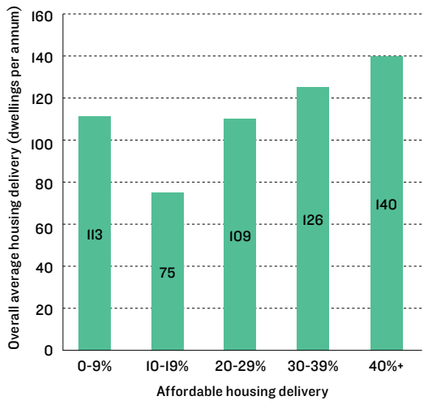
Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



Source: Lichfields analysis

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	**73**	**353**	**409**	**22**	**35**	**178**

Source: Lichfields analysis

[24] https://www.gov.uk/government/publications/independent-review-ofbuild-out-final-report

[25] https://www.gov.uk/government/publications/independent-review-of-build-out-final-report

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

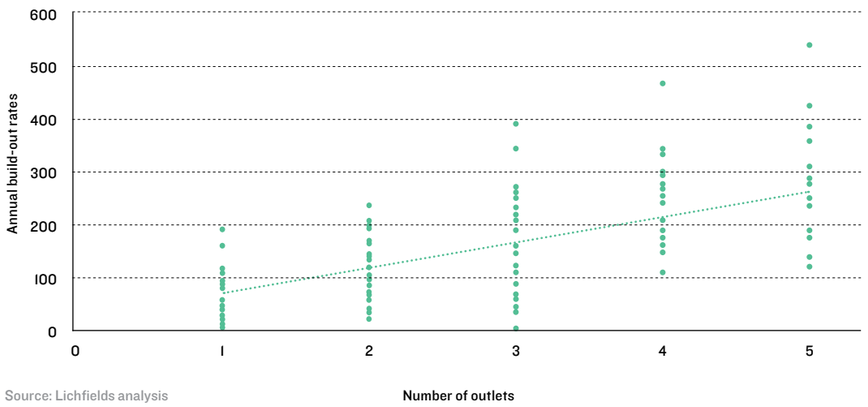
Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis



Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

06
Delivery of brownfield, urban apartment schemes

Government policy is seeking to increase the emphasis on brownfield residential development, and higher density, apartment schemes are likely to be a consequence. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

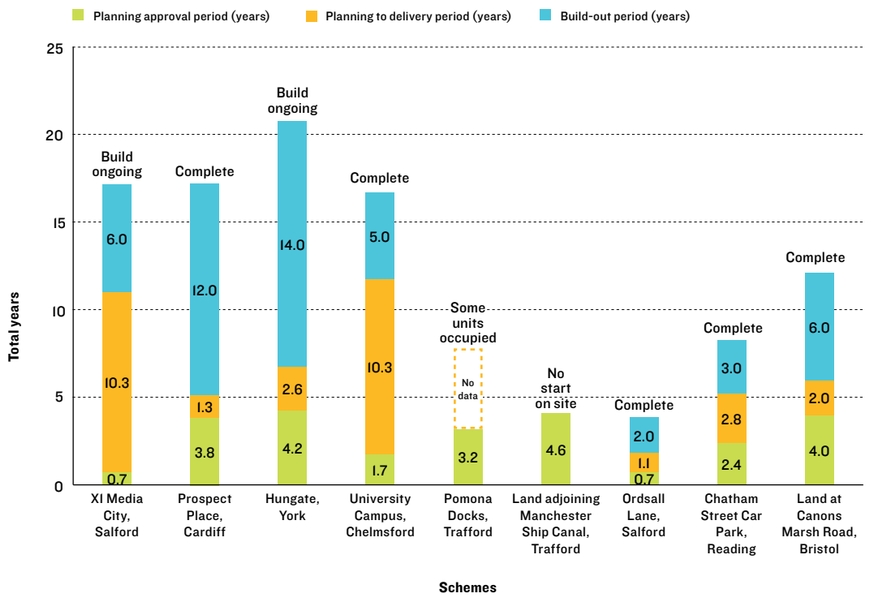
1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
   - **X1 Media City**: This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012. A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.
   - **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	XI Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE		**3.5**	**4.3**		
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE		**2.9**	**2.0**		

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the 'all or nothing' requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

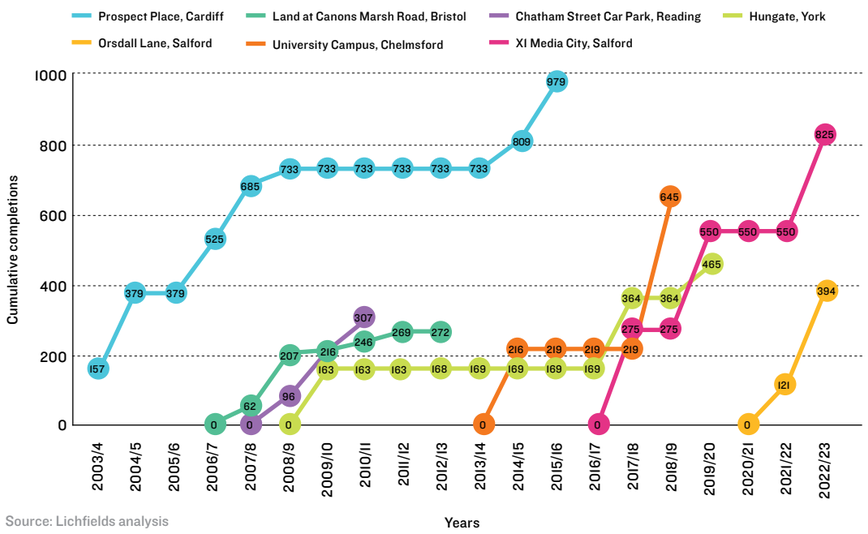
From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes available for sale and occupation. Furthermore, while some significant 'peak' annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
XI Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)

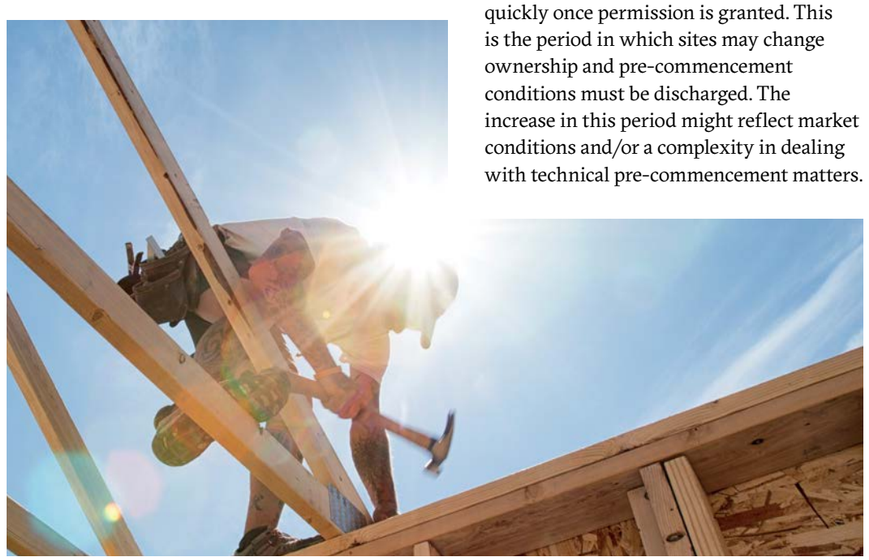


Source: Lichfields analysis

07 Conclusions

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the CMA's work. We present some statistical averages to assist the debate, but the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and it is these – alongside the characteristics of individual sites – that needs to be considered carefully by local authorities relying on these projects to deliver planned housing.

The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build out illustrates the risk of relying on a singular estimate.



Key findings

1. **Only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application**

   When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period from the date that the first application is validated. The lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period.

   The planning to delivery period is circa 1.3 – 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.

2. Average annual build-out rates on large scale sites are lower than previous editions of this research

The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 151 dpa. For sites of under 1,000 homes, the median build-out rate is also lower. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.



3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows, a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked, and mortgage affordability will improve in 2025.

4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.

5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering 10-19% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.



© Super Straho via Unsplash

6. **Large-scale apartment schemes on brownfield land are less predictable forms of supply**

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the GFC.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

"While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year."

The CMA's recommendation on seeking to speed up the pace of new housebuilding should be viewed in the context of this research which, when compared with the first and second editions, shows that reported average build-out rates are slightly lower, albeit only slightly.

As we approach a general election, and with the housing crisis unresolved, the challenge of boosting housing delivery is being discussed with renewed vigour.

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed. Other factors – including funding for affordable housing and to unblock barriers to site delivery – are also needed.

In the current environment, a sufficient pipeline of sites with planning status in each location (itself dependent on a functioning planning system), with a suitably varied range of housing types and tenures, and the forecast recovery of the housing market from its recent downturn are all necessary to secure a recovery in the supply of new homes.

Appendices

Contents

Appendix 1: Definitions and notes
Appendix 2: Large sites table
Appendix 3: Small sites tables
Appendix 4: Solely apartment scheme details

INSIGHT
START TO FINISH

Appendix 1:
Definitions and notes

The ‘lead-in’

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time also includes the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The ‘planning approval period’

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwelling/s on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed ‘consent’ was considered reasonable and proportionate milestone for ‘planning’ in the context of this research. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted ‘planning to delivery period’.

The ‘planning to delivery period’

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the ‘first housing completion’

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The ‘annual build-out rate’

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Appendix 2: **Large sites tables**

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Ebbsfleet	Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312	613	553	347	533	619											
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	239	223	460	299
Houlton (Rugby Radio Station)	Rugby	6,200	2019/20	11	197	210																						
Land at Chilmington Green (South Ashford GC)	Ashford	5,750	2019/20	75	74																							
Sherford	South Hams	5,500	2016/17	7	130	142	151	113	108	183																		
Hanwood Park (East Kettering SUE)	North Northamptonshire	5,500	2016/17	29	124	132	179	103	230																			
North West Preston (MD2)	Preston	5,300	2015/16	57	250	297	411	307	266	372	359																	
Priors Hall	North Northamptonshire	5,200	2011/12	56	21	59	87	170	155	269	238	171	145	112														
Former Alconbury Airfield, Huntingdon	Huntingdonshire	5,000	2021/22	208	208																							
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	29	57	0	0	10													
Monkton Heathfield	Somerset West and Taunton	4,500	2012/13	22	76	220	191	222	145	84	49	89	67															
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47	95	344	177	218	251										
Thorpebury (North East Leicester SUE)	Charnwood	4,500	2021/22	32																								
Whitehouse - Western Expansion Area	Milton Keynes	4,320	2015/16	21	124	270	297	341	151	141	134																	
Valley Park (Land to the west of Great Western Park)	Vale of White Horse	4,254	N/A																									
Broughton Gate & Brooklands (Eastern Expansion Area)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138	144	305	239	242	187	309	254	158											
Glan Llyn (Former Llanwern Steelworks)	Newport	4,000	2011/12	10	35	112	76	127	75	124	154	67	55	190	171													
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86	57	53	153															
Stanton Cross	North Northamptonshire	3,650	2018/19	57	158	132	111																					
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262	200	195	164	211	236																	
Chatham Docks/ Waters	Medway	3,600	2021/22	199	193																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Overstone Leys (Northampton North SUE)	Daventry	3,500	2017/18	21	47	58	68	163	197																			
Northstowe Phase 2	South Cambridgeshire	3,500	2020/21	2	41																							
Long Marston Airfield	Stratford-upon-Avon	3,500	2021/22	77																								
South East Coalville (Land north and south of Grange Road)	North West Leicestershire	3,500	2018/19	4	63	124	272	207																				
Great Western Park	South Oxfordshire	3,364	2011/12	110	204	232	392	368	389	431	471	430	205															
Grantham North West Quadrant (Poplar Farm & Rectory Farm)	South Kesteven	3,350	2013/14	13	102	108	25	74	193	108	43	8																
Cambourne (original new settlement)	South Cambridgeshire	3,300	1999/00	42	180.5	180.5	213	337	620	151	378	268	219	191	161	206	154	151	128	239	201	96	126	87	32	61	93	
Lawley Village	Telford and Wrekin	3,300	2013/14	176	251	211	190	210	367	57	10																	
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	2010/11	22	164	273	321	562	378	350	265	340	191	107	136	158												
Land Around Fernwood	Newark and Sherwood	3,200	2019/20	3	53	87	141																					
Middlebeck (Land South of Newark)	Newark and Sherwood	3,150	2018/19	57	90	117	152	87																				
Oakley Vale	North Northamptonshire	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	127	103	51	40	9	78	68	59	88	87				
Land North of Beaconside/Stafford	Stafford	3,100	2018/19	10	33	30	27	111																				
Burgess Hill Northern Arc	Mid Sussex	3,040	N/A																									
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31	27		
North West Cambridge	Cambridge	3,000	2016/17	73	353	409	22	35	0																			
West of Waterlooville	Havant	3,000	2009/10	38	71	30	82	112	135	196	241	193	194	181	91	109	93											
Lighthorne Heath, Kingston Grange	Stratford-upon-Avon	3,000	2019/20	13	34	219																						
Towcester Vale SUE (JCS Policy T3)	West Northamptonshire	3,000	2017/18	42	192	135	145	174	236																			
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																			
Glebe Farm	Milton Keynes	2,900	2019/20	63	177	422	214																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Wintringham Park, St. Neots	Huntingdonshire	2,800	2020/21	50	81	166																						
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	90	19	0	4	0	0												
Mowbray, North of Horsham	Horsham	2,750	N/A																									
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419	344	361	348	291															
Winterstoke Village, Western-super-Mare	North Somerset	2,550	2014/15	132	185	242	161	178	42	56																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	238	387	424	122	254	262	194	234																
Branston Locks	East Staffordshire	2,500	2018/19	3	33	84	138																					
Great Wilsey Park, Haverhill	West Suffolk	2,500	2022/23	90																								
Kilnwood Vale	Horsham	2,500	2013/14	75	76	131	51	53	196	74	199																	
City Fields	Wakefield	2,500	2017/18	59	92	125	200	298	336																			
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118	71	28	0	54																
East Anton (Land East Icknield Way)	Test Valley	2,484	2009/10	184	257	103	181	135	229	146	184	162	239	279	242													
Kingsbrook (Aylesbury Garden Town)	Buckinghamshire	2,450	2016/17	92	219	181	204	184	235	201																		
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154	232	273	165	296													
Cambourne West	South Cambridgeshire	2,350	2021/22	93																								
The Steadings (Chesterton Strategic Site)	Cotswold	2,350	2022/23	2																								
Broadlands	Bridgend	2,309	1999/00	288	331	307	193	204	156	64	104	91	28	81	50	147	11											
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45	52	52	0	0														
Arborfield Garrison	Wokingham	2,225	2016/17	57	114	116	268	348	336																			
Fairfields (Western Expansion Area)	Milton Keynes	2,220	2015/16	114	165	267	288	163	105	112	77																	
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168	174	125	167	118	8												
Great Kneighton (Clay Farm)	Cambridge	2,188	2012/13	16	271	393	149	467	539	109	93	99	52															
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30												
Money Hill - Land north of Ashby de la Zouch	North West Leicestershire	2,050	2017/18	42	28	27	24	11	30																			
Land to the north east of Didcot	South Oxfordshire	2,030	N/A																									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90	13	53	121	49																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
North Felixstowe Garden Neighbourhood	East Suffolk	2,000	2021/22	10	65																							
Comeytrowe / Trull	Somerset West and Taunton	2,000	2021/22	4																								
Graven Hill	Cherwell	1,900	2016/17	1	28	122	44	176																				
North East of Didcot	South Oxfordshire	1,880	2019/20	27	82																							
Elvetham Heath (Fleet)	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6																
Colethrop Farm (Hunts Grove)	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22	112	127	209	122													
Great Denham	Bedford	1,750	2009/10	92	150	159	71	122	146	123	211	162	191	63	39	25	9											
Horwich Loco Works	Bolton	1,710	2018/19	3	33	45	30																					
Land at Berry Hill, Mansfield	Mansfield	1,700	2018/19	36	131	172	157	80																				
Tadpole Garden Village	Swindon	1,695	2014/15	27	161	400	215	448	328																			
Plymstock Quarry	Plymouth	1,684	2013/14	2	100	110	57	71	73	73	41	23	56															
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96				
Red Lodge	West Suffolk	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111											
Melton Road, Edwalton	Rushcliffe	1,667	2016/17	40	126	271	144	140																				
Newton Leys	Milton Keynes	1,650	2014/15	223	140	154	88	134	148	103	102	76																
South West Bicester (Phase I Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196	205	110	95															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8	110	76	16	87	0	161													
Chesterwell, North Colchester Urban Extension	Colchester	1,600	2015/16	150	150	150	150	150	56	59	90																	
Harworth Colliery - Simpson Park	Bassetlaw	1,600	2014/15	7	28	45	36	2	62	43	63	42																
Parc Derwen	Bridgend	1,577	2010/11	8	103	134	201	199	197	157	186	157	94	19	51													
Chesterfield Waterside, Brimington Road, Chesterfield	Chesterfield	1,550	2014/15	19	0	0	0	0	0	46	32	62																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86												
Horley North West Sector	Reigate and Banstead	1,510	2017/16	256	264	204	113	244	188																			
Jennet's Park, Peacock Lane	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28	16	65	47	0	0									
Northstowe Phase I	South Cambridgeshire	1,500	2016/17	13	140	278	243	256	178																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Sutton New Hall Farm	Cheshire West and Chester	1,500	2016/17	41	90	13	53	121	49																			
Burleyfields (part of the West of Stafford Strategic Development Location)	Stafford	1,500	2020/21	49	98	175																						
Hartland Park	Hart	1,500	2020/21	46	64	66																						
West Carclaze Eco-community	Cornwall	1,500	2021/22	11	60																							
Handley Chase - Sleaford South Quadrant	North Kesteven	1,450	2018/19	2	6	29	17	134*																				
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85	49	3														
Rochester Riverside	Medway	1,400	2019/20	126	117	88	127																					
Park Prewett Hospital, Aldermaston Road, Basingstoke	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16						
Northern Gateway (Airfields and former Corus site)	Flintshire	1,325	2020/21	112	135	36																						
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90	163	29	71									
Kings Moat Garden Village	Cheshire West and Chester	1,300	2019/20	5	83	138																						
Bolnore Village	Mid Sussex	1,279	2000/01	10	66	61	244	159	168	52	99	15	0	0	0	53	68	68	86	61	51	18						
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24																	
Blue Boar Lane	Broadland	1,233	2015/16	75	165	253	243	180	160	110	47																	
Picket Twenty	Test Valley	1,219	2011/12	147	178	180	176	164	145	175	96	155	169	124	38													
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101	61	78	47	1									
Staynor Hall	Selby	1,200	2005/06	1	69	170	28	45	57	53	42	111	90	84	65	46	31	22	15	25	13							
Trumpington Meadows	Cambridge	1,200	2011/12	2	137	141	67	105	89	123	148	72	128	48														
North Ely (Orchards Green)	East Cambridgeshire	1,200	2018/19	49	50	70	80																					
Winnington Urban Village	Cheshire West and Chester	1,200	2013/14	86	159	144	176	62	142	65	70	17																
Heyford Park (Former RAF Upper Heyford)	Cherwell	1,183	2014/15	46	166	106	103	97	58	76																		
Oxley Park (East & West)	Milton Keynes	1,159	2004/05	52	166	295	202	115	91	75	163																	
Icknield Port Loop	Birmingham	1,150	2019/20	40	175																							
North West Haverhill, Ann Suckling Road	West Suffolk	1,150	2020/21	89	40	80																						

*(+67 communal accommodation)

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Orchard Park, Cambridge	South Cambridgeshire	1,120	2006/07	100	290	148	103	95	56	34	16	75	39	30	2	42												
Velmead Farm, Fleet	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4												
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157	181	19	48																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15	119	111	115	124																				
Llanwern Village	Newport	1,100	2019/20	31	74	39	52																					
Land at Kingsley Fields	Cheshire East	1,100	2018/19	49	151	125	177																					
Cottam Strategic Site (MDI)	Preston	1,100	2014/15	23	15	61	46	58	43	101	114	211																
Land north of Woodhall Business Park	Brentwood	1,100	2022/23	20																								
Bankside Phase 1, Banbury (Longford Park)	Cherwell	1,090	2014/15	148	218	140	142	96	167	52																		
Highwood	Horsham	1,090	2012/13	56	82	103	76	96	39	71	43	1																
Highfields Farm	South Derbyshire	1,064	2016/17	141	204	275	252	102	57																			
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116	105	108	58	76																	
Gedling Colliery/ Chase Farm	Gedling	1,050	2017/18	25	65	96	64	90																				
North East Bexhill (The Gateway)	Rother	1,050	2020/21	23	67	68																						
South Maldon Garden Suburb	Maldon	1,042	2018/19	5	45	111	137	163																				
Tamworth Golf Course (Amington Garden Village)	Tamworth	1,037	2017/18	28	90	155	87	112	68																			
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122	155	70	100	87	81															
Northampton North of Whitehills SUE	Daventry	1,000	2015/16	9	108	176	59	44	125	124	71																	
Weldon Park SUE	North Northamptonshire	1,000	2016/17	39	62	111	74	75	126																			
Land at former TRL site, Nine Mile Ride (Buckler's Park)	Bracknell Forest	1,000	2018/19	35	132	59	59	140																				
Arkall Farm, North of Ashby Road, Tamworth	Lichfield	1,000	2021/22	4	75																							
Limebrook Park, Wycke Hill, Maldon	Maldon	1,000	2019/20	5	60	85	110																					
RAF Cardington	Bedford	1,000	2014/15	5	108	100	109	36	57	81	144	276																
Collingtree Park - Northampton South SUE (JCS Policy N5)	West Northamptonshire	1,000	2020/21	98	100																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Northampton Upton Park SUE (JCS Policy N9)	West Northamptonshire	1,000	2020/21	4	130	139																						
Folkestone Harbour/ Seafront	Folkestone and Hythe	1,000	2021/22	84	40																							
Land to the north of Totton	New Forest	1,000	2022/23	51																								
Land West of Uckfield	Wealden	1,000	2018/19	3	50	45	35																					
Taylors Farm/ Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12												
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	112	91	13																	
Little Stanion	North Northamptonshire	970	2009/10	106	116	74	121	102	93	89	86	27	26	9	1	30												
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60	75	103	73	93	23										
Ingress Park, Greenhithe	Dartford	950	2002/03	184	0	275	100	74	0	119	0	0																
Upper Cambourne	South Cambridgeshire	950	2012/13	88	123	239	201	96	81	83	32	7																
Nar Ouse Millenium Commuity	King's Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0	37	13												
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42	15	18	49	16	32						
Badbury Park (Commonhead)	Swindon	890	2014/15	49	230	241	138	127	73																			
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30															
Abbotswood	Test Valley	790	2011/12	30	190	157	114	152	90	20	0	10	27															
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																			
The Parks, formally Staff College	Bracknell Forest	730	2007/08	104	88	101	54	47	72	59	94	78	0	0	0	0	0	0	0									
Northside	Gateshead	718	1999/00	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43								
Land at West Blyth accessed from Chase Farm Drive	Northumberland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90	62	37	53	58	56										
Alver Village (Rowner Renewal Project)	Gosport	700	2010/11	4	100	70	45	89	101	79	97	8	27	10	0													
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110	70	61	88	0	76																	
Beacon Park (South Bradwell)	Great Yarmouth	700	2015/16	42	58	81	79	54	113																			
Foxhill/Mulberry Park	Bath and North East Somerset	700	2016/17	8	110	120	86	70	88																			
Land North of Harvest Ride and South of Forest Road and East of West End Lane, Warfeild	Bracknell Forest	675	2015/16	3	85	75	117	88	92	67	25																	

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Staiths South Bank	Gateshead	667	2003/04	24	58	0	44	0	48																			
Jurston Farm	Somerset West and Taunton	650	2019/20	16	43	31																						
Land south of Wansbeck General Hospital, Ashington	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54	50	60	82	64	0							
Kings Hill Phase 3	Tonbridge and Malling	635	2018/19	29	95	120	100																					
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0								
Ochre Yards (Ref: 103/01)	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2	0	0	46	4	52	2													
Land West of Southwater	Horsham	606	2017/18	56	128	43	20																					
Former Runwell Hospital	Chelmsford	575	2016/17	92	89	87	70	55	43	46																		
Land to the west of Wallingford	South Oxfordshire	555	2020/21	18																								
Land Nnorth of Netherhouse Copse	Hart	528	2021/22	52	104																							
Thingwall Lane	Knowsley	525	2013/14	79																								
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	0	14	13	18	15											
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																				
Land west of Copthorne	Mid Sussex	500	2019/20	3	68	74	112																					

Appendix 3:
Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
128-134 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4:
Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated – 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 – 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated – 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued -21/06/2002
Extended planning period	03/724/R – Reserved Matters for 99 units 03/725/R – Reserved Matters for 58 units 02/1252/R – Full application including 677 apartments 03/01973/R – Full application including 222 residential units 04/2474c – Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c – 394 units – granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 – 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM – Phase II – 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM – Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM – Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM – outline to redevelop for 720 units – extension of time to 02/03741/OUT 13/03015/FULM – Phase II 195 units 15/01709/OUTM – Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM – Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 – 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated – 10/03/2004 Decision Issued – 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated – 13/03/2018 Decision Issued – 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown – unable to obtain completions data to identify year of first completion
Build period	Ongoing – unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated – 05/02/2003 Decision Issued (appeal) – 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated – 19/04/2004 Decision Issued – 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase 1), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal – Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued – 30/07/2010 First reserved matters application (78681/RM/2012) Validated – 12/05/2012 Decision Issued – 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated – 09/07/2015 Decision Issued – 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated – 17/02/2020 Decision Issued – 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued – 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 – 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation – 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued – 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated – 30/07/2004 Decision Issued – 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 – 3
Notes from LPA	N/A

The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

Read more

You can read more of our research and insight at lichfields.uk

Our bespoke products, services and insights



Small builders, big burdens

How changes in planning have impacted on SME house builders



Making a bad situation worse

The impact on housing supply of proposed changes to the NPPF



Headroom

Objective assessments of local housing needs



Sizemix

Securing the right mix in residential development proposals

Contacts

Speak to your local office or visit our website.

Birmingham
Jon Kirby
jon.kirby@lichfields.uk
0121 713 1530

Bristol
Andrew Cockett
andrew.cockett@lichfields.uk
0117 403 1980

Cardiff
Simon Coop
simon.coop @lichfields.uk
029 2043 5880

Edinburgh
Nicola Woodward
nicola.woodward@lichfields.uk
0131 285 0670

Leeds
Christopher Darley
christopher.darley@lichfields.uk
0113 397 1397

London
Matthew Spry
matthew.spry@lichfields.uk
020 7837 4477

Manchester
Simon Pemberton
simon.pemberton@lichfields.uk
0161 837 6130

Newcastle
Michael Hepburn
michael.hepburn@lichfields.uk
0191 261 5685

Thames Valley
Daniel Lampard
daniel.lampard@lichfields.uk
0118 334 1920

Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no. 2778116. Registered office: The Minster Building, 21 Mincing Lane, London EC3R 7AG.
© Nathaniel Lichfield & Partners Ltd 2024. All rights reserved.

Appendix G:
Office Market Letter for Caldicot
December 2024

11 December 2024

Gary Carver
E: gcarver@savills.com
DL: +44 (0) 2920 368963
F: +44 (0) 2920 368969

2 Kingsway
Cardiff CF10 3FD
T: +44 (0) 29 20 368900
savills.com

Mark Wilson

Strategic Land and Planning Manager

Taylor Wimpey Strategic Land

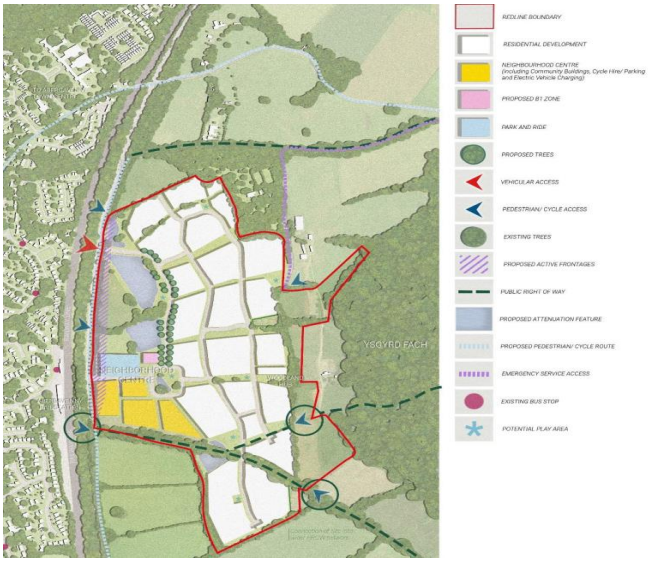
Email: mark.wilson@taylorwimpey.com

Dear Mark,

CALDICOT EAST – DEMAND FOR OFFICE FLOORSPACE

I have been active as an office agent within the South Wales market for more than 27 years and have been a Director at Savills, specialising exclusively in office agency, for over 16 years. I have extensive experience in advising both occupiers and landlords in the letting, sale and acquisition of office accommodation, as well as advising developers of speculative office accommodation across South Wales.

You have asked me to provide an opinion around the prospects and viability of a speculative office development coming forward as part of a wider strategic development in Caldicot. From our discussions, I understand that a new Local Development Plan is being prepared and that this is includes a new strategic site in Caldicot which is identified as having capacity for 770 homes, a primary, school, and mixed-use neighbourhood centre. You have provided me with the indicative masterplan below, which shows the provision of 1ha of office floorspace in the area shaded pink.



Savills Commercial Limited. Chartered Surveyors. A subsidiary of Savills plc. Registered in England No. 2605125.
Registered office: 20 Grosvenor Hill, London W1K 3HQ

The office market is challenging at present and has been for a number of years. The impacts of COVID19 and the growth of remote / flexible working has meant that companies are looking carefully at how they occupy offices going forward and, in many cases, occupiers have sought to reduce the amount of space they occupy. We are seeing many companies seeking better quality space in locations providing better quality accommodation with good public transport infrastructure.

Where there is demand for out-of-town locations, this tends to be as part of traditional out of town office parks and at a large enough scale where there are nearby facilities. Access to the strategic road network also tends to be a key requirement for occupiers.

As there is no office market in Caldicot it is worth reviewing the Newport office market to give regional context.

The total office stock in Newport is approximately 2,000,000 sq. ft. which includes offices located in the city centre and business parks along the M4 Motorway.

The majority of the better quality space in Newport has traditionally been located in the out of town business parks around junctions 28 and 24 of the M4 Motorway which include Langstone Business Park (J24), Imperial Park, Celtic Springs and Cleppa Park (all J28).

These business parks have successfully attracted a number of high-profile companies who have been attracted by the quality of accommodation provided and easy access to the M4.

Celtic Springs, which is regarded one of Wales premier business parks, has attracted occupiers including Dwr Cymru Welsh Water, Ministry of Justice Airbus and Wales and West Utilities. Also located in the parks surrounding J28 are The Patent Office, the Office for National Statistics and Lloyds Bank.

The majority of city centre stock is contained in 1960's and 1970' office buildings although there are new refurbishment schemes currently in the pipeline in the city centre which will improve the quality of stock available. These include The Hub, which will provide 50,000 sq. ft. of high quality space and Chartist Tower, where around 12,000 sq. ft. of Grade A space is available, with 12,000 sq. ft. recently let to Newsquest Media Group. Prior to these developments, the most recent development in the city was the 81,000 sq. ft. office built for Admiral Insurance in 2014, located opposite Newport Station.

Admiral Insurance have recently completed on the purchase of the property and have placed the entire building on the market as being available to let following a decision to close the office and consolidate in their head office in Cardiff, which is a direct result of the effects of hybrid working.

Annual demand for offices in Newport is limited with annual take up rates averaging less than 60,000 sq. ft. per annum over the last 5 years. The majority of demand is for smaller suites of sub 2,500 sq. ft.

The most notable recent letting in Newport recently was the letting of Imperial House, Imperial Park to Vantage Data Centres who took a 10-year lease with 5-year break of the refurbished building at £13.50 per sq. ft. earlier this year. This is the largest letting in Newport in the last 10 years.

Prime headline rents stand at £16 per sq. ft. for the city centre and £15 per sq. ft. out of town. Grade B headline rents vary significantly depending on the level of specification with a range of circa £5.00 to £10.00 per sq. ft.

There has been no speculative development of offices on the business parks surrounding Newport since the completion of 28 West in 2010 and it is unlikely there will be any speculative development for the foreseeable future given the development is currently unviable.

There is currently around 357,000 sq. ft. of offices available to let in Newport including the city centre and out of town business parks. This figure does not include the available spaces in serviced offices in Newport. Based on recent take up rates this would suggest a supply of 6 years stock.

The schedule below set out the current availability of offices in Newport.

Property Address	Availability (sq. ft)	Rent (per sq. ft)
Norwich House, 1-2 Gold Tops	1,074	£12.00
1st Floor, Lorry Park, Albany Street	1,577	£9.50
11-20 Devon Place	1,701	£12.00
5 Cedar Court, Hazell Dr	1,716	£12.50
Teme House, 24 Severn Langstone Business Park	1,744	£12.50
Chester House, Goldtops	1,771	£11.30
Drake House, Langstone Park	2,072	£10.00
Baneswell Road	2,779	£7.20
Wye House, 24 Severn, Langstone Business Park	3,847	£12.48
17-18 High St, Newport	4,296	£10.50
Drake House, Priory Drive	4,325	£10.00
149 -151 Commercial Street	4,488	£9.00
St Marks House, 3 Gold Tops	5,059	£9.88
Lanyon House, Lower Dock St	5,298	£12.50
Chartist Tower, Upper Dock St	6,057	£14.50
Imperial Park, South Lake Drive	7,716	£9.00
Part 1st Floor, Q2, Imperial Way	10,038	£14.00
Kings Chambers, High St	11,066	£12.50
Chartist Tower, Upper Dock Street	13,726	£15.00
Clarence House, Clarence Place	20,000	£10.00
Imperial House, Imperial Park	22,875	£16.00
Stephenson Street	24,730	£8.00
Guinevere House, Priory Drive, Langstone Bus. Park	27,533	£14.00
The Coldra, Coldra Woods	36,027	£10.00
The Hub, 22-29 Mill St	55,060	£14.50
Admiral House, Queensway	80,814	£16.50

A number of these buildings have been vacant for in excess of 12 months including Guinevere House, Langstone Park, which has been vacant for over 9 years. This provides high quality offices accommodation and was previously occupied by Admiral Insurance.

Scarborough Developments, the developers of Admiral House, have planning permission to build a 6-storey grade A office, extending to 53,000 sq. ft, adjacent to Admirals building. It will be known as Interface and is the next stage of the Station Quarter development. This will not be developed without a pre-let and is not viable at present.

A company considering offices available in Newport is also likely to consider offices available to let on the Eastern side of Cardiff, in particular offices at the business parks to the East of the city.

These could include.

Address	Size (sq. ft.)	Comments
Centre 7, Cardiff Gate Business Park	51,374	Purchased by the Welsh Govt and available to let to companies in the semi-conductor sector. Has been vacant for over 5 years.
Severnside House, St Mellons Business Park	15,424	Half of the building available following letting to Euroclad. Been vacant for approx. 2 years following refurbishment.
Raglan House, Cardiff Gate Business Park	23,877	Part occupied.
Eastern Business Park St Mellons	76,000	Various suites available on campus development, much of which has been vacant for 3 years plus.
Fairway House, Paramount Park, St Mellons Business Park	7,343	High quality office with excellent parking
Ty Meridian, Cardiff Gate Business Park	50,666	Former SSE offices which have been vacant for over 18 months.
5 St Mellons Business Park	22,500	May also sell.

It has been well documented that the cost to construct an office has escalated since 2020, fuelled by the shortage of materials and additional costs attributed to ESG and net carbon zero. Build costs typically range from £250 to £350 per sq. ft at present, subject to specification, etc.

Furthermore, the demand for office investments has weakened despite the cautious optimism that base rates will reduce in the latter parts of 2024. This continued lack of demand for office investments has resulted in the prime yields for regional offices being at their highest points since 2009 with prime regional office yields softening by around 200 basis points since 2022.

Cardiff is now at around 8.25%, by comparison, Bristol is 6.75%.

Taking into account these factors, this has made the construction of office in many parts of the UK unviable.

If a developer were considering a development of offices on the subject site of, say, 30,000 sq. ft., then assuming a best case scenario of a build cost of £250 per sq. ft, a 15 year lease to good covenant and sale yield of 7%, a rent of around £35 per sq. ft. would need to be obtained.

This is over double the current prime headline rent for Newport and £7 per sq. ft above the prime headline rent for Cardiff city centre. No tenant would be prepared to pay this level of rent for an office in Caldicot, let

alone Cardiff city centre at present. There would be no prospect of rental increase during the term of the lease for any investor and no investor appetite.

As things stand, the development of a new office, whether speculatively or on a pre let basis, isn't viable or fundable. This is why there has been no development of offices on business parks in South Wales for over 10 years.

The only sole privately funded new-build office development in South Wales in the last 5 years is a development by JR Smart at John Street, Cardiff. This is a 10-storey office building located in a highly prominent location adjacent to Cardiff Central Railway Station. Construction of the building started prior to the COVID19 pandemic and JR Smart has extensive experience of progressing such developments across the city. I have included a plan from the marketing brochure for that building as it is useful to show the proximity of its location to public transport hubs (Cardiff Central Railway and Bus Station), other commercial office buildings, and the services which office occupiers want to be close to.

Added to this, I am aware of a significant number of sites within South Wales which benefit from full or outline planning permissions for office development (and have done for a number of years) but have not come forward and where there is no realistic prospect of delivery. This includes other prominent sites in Cardiff city centre and Cardiff Bay which is a significantly more buoyant and mature market than Caldicot. The best example is Central Quay, to the rear of Cardiff Central Station where pre lets to major occupiers have not been progressed as the build costs, yields and resulting rents required make the development unviable.

My view is that there is no realistic prospect of the private sector developing 1ha of new office floorspace at any part of the strategic site identified at Caldicot. The office market is very challenging at present, and we are seeing extremely limited private investment in new office floorspace with the real focus on quality of location. The site is neither well located for access by public transport nor is it particularly well accessed from the strategic road network. It lacks any sort of roadside frontage and is very much distant from the services that office occupiers wish to be close to.

Kind regards,

Yours sincerely

[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Taylor Wimpey PLC	Savills UK Ltd
Address:	[redacted]	[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Strategic Policy S1 (Growth Strategy) of the Deposit Plan outlines the housing and employment land requirements for the Replacement Local Development Plan (RLDP) period. Policy S1 sets out the housing growth for Monmouthshire between 2018 and 2033 with a housing requirement of 5,400 homes plus 15% flexibility allowance raising the housing provision to 6,210 homes.

Selected Growth Option

Taylor Wimpey have engaged throughout the consideration of the Growth Strategy, providing comments on both versions of the Preferred Strategy. Our response to January 2023 Preferred Strategy is included as Appendix A and therefore those comments are not repeated here, but Taylor Wimpey's position has been that Growth Option 1 (which was effectively the continuation of the growth strategy presented in the 2021 version of the Preferred Strategy) should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (September 2022). The assessment of the Growth Options as presented in the Growth and Spatial Options Paper is replicated below:

	Green	Amber	Red
Growth Option 1	12	5	0
Growth Option 2	9	8	0
Growth Option 3	3	6	8

Whilst it is recognised that Welsh Government raised a non-conformity objection to the use of Growth Option 1, instead requiring the selection of Growth Option 2 to align with the position of Monmouthshire outside of the National Growth Area in Future Wales: The National Plan 2040, Taylor Wimpey's view is that it is unsound to select a growth option that performs less well in the analysis contained within the Growth and Spatial Options Paper September 2022 than other growth options that were considered but dismissed.

Given that this policy serves as a foundation for other policies that will be included in the RLDP, the effect is that an unsound approach to Policy S1 infects the direction taken by other policies and the approach to site allocation.

For housing, the selection of a lower Growth Option, as well as being fundamentally unsound for the reason set out above, means that the starting point with regards to the number and type of sites to be allocated is incorrect.

Taylor Wimpey's comments at that stage also suggested that, if Growth Option 2 were to be used (this being the option presented in the 2023 version of the Preferred Strategy and carried forward in the Deposit RLDP) then it needs to uplifted to reflect:

- The increased level of net inflow from nearby English authorities in recent years rather than making an assumption of an average inflow from these authorities over a far longer period of time; and

- The divergence between the 2018-based household projections and the 2021 Census actual number of households. If this were to be extrapolated over the RLDP plan period, this could represent a significant under estimation of growth in households.

This is a sound and evidence-based approach and one which the Development Plans Manual allows for.

Extent of Flexibility Allowance

The Deposit Plan proposes the application of a 15% flexibility allowance on top of the housing requirement of 5,400 homes so that the RLDP will make provision for 6,210 homes.

Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum) but that a higher flexibility allowance can be applied through an evidence based approach that demonstrates the need for it.

Taylor Wimpey welcomes the increase in the flexibility allowance from 10% previously proposed at Preferred Strategy stage. Taylor Wimpey also commented that the flexibility

allowance should be increased from the 10% figure presented at Preferred Strategy stage and, in that sense, it is positive to see that the Deposit proposes that this is increased to 15%.

That said, Taylor Wimpey continue to have concerns that even this figure is inadequate based on the under delivery over the adopted LDP plan period where the 2022 Annual Monitoring Report's recognised that only 66% of homes planned for had been delivered.

The Development Plans Manual allows for the use of a bespoke flexibility allowance if properly evidenced and Taylor Wimpey suggest that the shortfall in housing delivery over the ALDP plan period provides that justification for the incorporation of a higher flexibility allowance.

The use of flexibility allowances in excess of 10% has recently been established in the cases of both the Bridgend RLDP (which incorporates a 14% flexibility allowance) and Merthyr Tydfil (which incorporates a 25% flexibility allowance).

Whilst it is recognised that a flexibility allowance of 34% driven by the ALDP shortfall in delivery is probably unrealistic, a flexibility allowance of 20% that sits between the Bridgend and Merthyr Tydfil examples seems appropriate.

Please refer to submitted written representations for further detail.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	x

The purpose of this policy is to establish a settlement hierarchy and spatial distribution of growth, as well as setting out how the requirement set out in Policy S1 will be met through the existing landbank, allowances for windfall sites, and new housing allocations made in the RLDP. Each point is commented upon in terms below:

Spatial Strategy

The proposed hierarchy places Caldicot (as part of the wider Severnside sub-region incorporating Rogiet) within Tier 1 of the settlement hierarchy, forming a main focus for new development through the plan period. This approach is obviously supported and reflects the suitability of the Severnside corridor for strategic growth – both because of the services within it and its regional connectivity.

Building on this, Taylor Wimpey support the approach of centralising Caldicot as the core settlement within the Severnside sub-region. This reflects that it is the most sustainable and best connected of the settlements within the corridor as well as containing the greatest range of services. Likewise, Taylor Wimpey support the direction that the Deposit RLDP seeks to take in terms of directing the vast majority of Severnside growth to Caldicot (albeit, as set out in response to subsequent questions, Taylor Wimpey do not support the proposed site allocation).

Since the consultation on the Preferred Strategy, the phosphate issue within Monmouth has been resolved with Dwr Cymru Welsh Water confirming plans to improve the waste water treatment works' phosphate stripping capacity such that it can be relied upon to

deliver a degree of new housing. Taylor Wimpey recognise that Monmouth is a Tier 1 settlement and that it is appropriate to direct a degree of growth towards it but Taylor Wimpey note that this has been solely at the expense of the Severnside:

	Preferred Strategy		Deposit	
	% of Distribution	No. of Homes	% of Distribution	No. of Homes
Severnside	44	2,609	35	2,190
Monmouth	5	275	15	923

This was reported to Full Council in October 2023 (where it was narrowly approved). The explanation that is provided in the Report to Full Council is as follows:

> *'The updated Preferred Strategy allows for housing and employment growth in Monmouth, resulting in a redistribution of growth and a reduction in the scale of the strategic site at Caldicot East and Severnside overall (new allocations reduced from 1,200 homes to 825 homes), as described in Paragraph 3.19.'*

It seems like the Deposit RLDP does not propose to make up this 375 home reduction in the Severnside sub-region through any new allocations.

The Report does not explain why it is the case that the proportion of new development directed to a single Tier 1 cluster has been so drastically reduced but the proportion of new housing to be directed towards the other Tier 1 settlements or in fact other tiers of the settlement hierarchy (which are inherently less sustainable than Caldicot) remains unchanged.

Such a pivot away from Severnside and adjustment to the distribution of growth, without being fully explained and justified, seems totally unsound.

Table 2

Table 2 of the Deposit RLDP provides a summary of the spatial distribution of housing provision, effectively breaking down the number of homes to be delivered in each settlement into completions, commitments, allowances, rollover allocations, and new allocations.

Taylor Wimpey commented extensively on this as part of the Preferred Strategy and, again, these representations are re-attached to this Statement rather than repeated again within these representations. Nevertheless, Taylor Wimpey's concerns still remain that:

- Save for the flexibility allowance applied on the housing requirement, no specific allowance is made for either the non-delivery or reduced capacity of both the existing commitments and rollover allocations;
- In calculating the windfall allowances, no discount is applied to other tiers of the settlement hierarchy as it follows, equally, that the delivery of windfall sites in these settlements has also become more challenging over time;
- No allowance is made for demolition of existing properties required to facilitate the delivery of windfalls.

Please refer to submitted written representations.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	x

As a starting point, Taylor Wimpey support MCC's approach to review the existing green wedges in the current LDP to assess whether they still meet the five purposes listed in Paragraph 3.67 of PPW 12.

The Green Wedge Assessment (March 2024) prepared by LUC effectively divides undeveloped land surrounding settlements into a series of parcels and then assesses their performance against PPW's five tests, ranking the performance of a parcel against each test as either Weak / No, Equal, Moderate, or Strong, before overall concluding whether a parcel has a High, Moderate-High, Moderate, Moderate-Low, or Low potential for designation as a Green Wedge.

The existing Green Wedge between Rogiet and Caldicot is split into four different parcels. Given that Taylor Wimpey's proposal limits built development only to Parcel RC3, only this parcel is considered further in this section. The approach taken in the Assessment is to suggest that Parcel RC3 has a High potential for designation as Green Wedge.

Taylor Wimpey's concern is that the review of this particular Green Wedge fails to consider the planned and safeguarded Severn Tunnel Junction Railway Station Link Road (commented on specifically in connection to Question 14) and the impact that its future delivery would have on the performance of any Green Wedge in this location against the five Green Wedge tests. It is clear that the aspiration of this link road has been given absolutely no consideration in the Green Wedge Assessment and there is no reference whatsoever to it in the description of Parcel RC3

A review of the Green Wedge Assessment (March 2024) has been undertaken below against the five purposes for Green Wedges that are set out in PPW.

The potential for designation as Green Wedge has been revisited on the basis of Option 1 of the 'Improving access to Severn Tunnel' Report. This is because it is the routing option that Taylor Wimpey have supported in previous representations and it best reflect the wording of Policy ST5. Given that there is a north-south spine through the site that is within Flood Zone 3 in the emerging Flood Maps for Planning, it follows that any link road would need to be elevated to be flood free.

The below assessment has also been undertaken on the basis of the masterplanning work for the site that has previously been undertaken by EDP which takes a green infrastructure led approach and incorporates a considerable undeveloped portion of land either side of the proposed Severn Tunnel Junction Railway Station link road.

Please refer to table on page 7 of written representations.

The message here is clear – it cannot be sound for the Deposit RLDP to propose the designation of land as a Green Wedge when the assessment work that underpins its designation fails entirely to consider a piece of infrastructure that the Deposit RLDP safeguards land for the delivery of.

The effect is that the Green Wedge Assessment suggests that Parcel RC3 has high potential for designation as a Green Wedge when the analysis undertaken by Savills which considers the impacts of the delivery of the Severn Tunnel Junction Railway Station suggests that in fact it has a far lower potential for designation as a Green Wedge and that in fact that the delivery of a link road in this location has a significant urbanising effect on the landscape, particularly given that flooding constraints across the site mean that it is likely to need to be raised.

This is particularly important given that one of the reasons that the site has been dismissed as part of the candidate site assessment process is because:

> *'...due to the scale of the proposal there are significant landscape concerns the proposal would have impacted on the openness of the green wedge land.'*

Taylor Wimpey's position is that the assessment work that has been undertaken to inform the designation of the site that Taylor Wimpey is promoting as a Green Wedge is entirely unsound and that this in turn has led to a failure to properly assess the performance of the candidate site.

Please refer to submitted written representations.

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	x
Please refer to submitted written representations.		

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	
	Objection:	x

Policy HA2 - Land to the East of Caldicot/North of Portskewett

This section of the Statement relates specifically to the Land to the East of Caldicot/North of Portskewett site that is proposed to be allocated as part of the Deposit RLDP under Policy HA2. The policy wording makes provision for the delivery of 770 homes, a primary school, 1ha of land for office accommodation, and a neighbourhood centre.

The Land to the East of Caldicot/North of Portskewett site was first identified as a potential strategic scale site in Severnside as part of the 2023 Preferred Strategy. This built upon the 2021 Preferred Strategy which identified a number of potential direction for strategic growth, including both the Land to the East of Caldicot/North of Portskewett site and Ifton Manor Farm.

Taylor Wimpey's position with regards to the Land to the East of Caldicot/North of Portskewett site is twofold:

- The Land to the East of Caldicot/North of Portskewett is a considerably worse performing site than the Ifton Manor Farm and the approach should therefore be to allocate the Ifton Manor Farm site instead; and

- Even if the Land to the East of Caldicot/North of Portskewett site is allocated, it will not deliver the number of homes that the Deposit RLDP expects it to over the plan period and therefore further allocations need to be made in the Severnside, including Taylor Wimpey's Ifton Manor Farm site.

Both of these points are considered in turn below:

Suitability of Land to the East of Caldicot/North of Portskewett Instead of Ifton Manor Farm

Included as part of the Deposit RLDP evidence base is the ISA Framework. The ISA framework sets out the relevant criteria each site is assessed against for each objective, where their performance has been given a score based on the significance of the impact – from negative to positive. MCC provide commentary against the ISA assessment for each subtopic per candidate site.

The ISA technical annex containing the candidate site assessment (September 2024) has been examined, with a particular focus on the comments provided for Ifton Manor Farm (candidate site ref. CS0253) under the ten ISA topics. Savills have responded to each of the comments provided by MCC and prepared a revised assessment, adjusting the score provided where required. This is set out in the supporting tables overleaf.

Please refer to table prepare on page xxx.

A subsequent comparison exercise has been performed between Ifton Manor Farm and the proposed residential allocation of the Land to the East of Caldicot/North of Portskewett site. The table shows both the scoring of the Ifton Manor Farm site according to the ISA and also when subject to Taylor Wimpey's analysis.

ISA Topic	ISA Scoring - Ifton Manor Farm	Taylor Wimpey Suggested Scoring - Ifton Manor Farm	ISA Scoring - Land to the East of Caldicot/North of Portskewett
Economy and employment	++	++	+
Population and communities	-	-	++
	++	++	++
Health and wellbeing	++	++	++
	++	++	++
Equalities, diversity and inclusion	-	?	-
Transport and movement	++	++	++
Natural resources	+	+	+
	-	-	-
	+	0	-
	+	+	+
	--	--	-
	--	-	--
Biodiversity and geodiversity	-	0	--
Historic environment	--	?	--
Landscape	+	++	?
Climate change	+	+	-
	-	+	-

This is summarised further as per the table below:

	++	+	?	0	-	--
ISA Scoring - Ifton Manor Farm	5	5	0	0	5	3
ISA Scoring - East of Caldicot/North of Portskewett	5	3	1	0	6	3
TW Suggested Scoring - Ifton Manor Farm	6	4	2	2	3	1

From the above analysis, it is clear that the ISA scores the Ifton Manor Farm site more strongly that the Land East of Caldicot/North of Portskewett site – it has fewer '-' scores and more '+' scores. Taylor Wimpey suggest that the proposed approach taken in the Deposit RLDP is therefore unsound in that it seeks to allocate a site that performs worse than an alternative site in the same tier of the settlement hierarchy.

Taylor Wimpey note that the Ifton Manor Farm site is smaller than the Land East of Caldicot/North of Portskewett site but this should not result in its dismissal as part of the candidate site process with a far sounder approach being to allocate the Ifton Manor Farm site in full with any residual requirement that is unmet in the Severnside sub-region to be delivered at a reduced Land East of Caldicot/North of Portskewett site. This aligns with the below point that Taylor Wimpey make with regards to the inability of the Land East of Caldicot/North of Portskewett site to deliver the forecast number of homes in the RLDP plan period.

Ability of Land to the East of Caldicot/North of Portskewett to Deliver the Forecast Number of Homes

Notwithstanding the above commentary around the suitability of the Land to the East of Caldicot/North of Portskewett site for allocation (and the suggestion is that the Ifton Manor Farm site is more suitable), Taylor Wimpey have serious concerns around the assumed delivery rate of the Land to the East of Caldicot/North of Portskewett site and suggest that, if it were to be allocated as part of the RLDP, it would not deliver the number of homes that the RLDP envisages that it would. This is a point that Taylor Wimpey has made throughout the preparation of the RLDP, providing comments at Preferred Strategy stage and making the same points at the Housing Stakeholder Group meeting on 5th September 2024 (as reported in Appendix 2 of the Housing Background Paper).

There are two reasons for this. Firstly, it will take longer to begin delivering homes than the Housing Trajectory suggests and, secondly, delivery rates will not be as high as the Housing Trajectory anticipates once delivery of homes does commence. This can be evidenced both from experience of the adopted Local Development Plan (ALDP)[1] and the headlines from the 'Start to Finish 3: How Quickly do Large-Scale Housing Sites Deliver?' paper prepared by Lichfields[2].

Each of these drivers is set out below:

Timescales for Delivery

[1] This is included at Appendix E. It provides an analysis of the times taken for the determination of planning applications for the seven strategic sites in the ALDP, as well as the annual delivery rates that these sites have achieved.

[2] This is the third edition of a piece of work undertaken by Lichfields. It uses data from sites across the UK to provide average figures relating to housing delivery depending on site capacity. It is available at this link.

The Housing Trajectory assumes that the Land to the East of Caldicot/North of Portskewett site will begin delivering homes from 2027/2028. This is based on a situation where the pre-application phase takes place for sixth months, a planning application takes 12 months to determine, and then there is a sixth month period between the grant of planning permission and the commencement of development onsite.

Given that the Housing Trajectory assumes that the site will deliver 75 homes in the first part of the 2027/2028 period, this must assume that an application is submitted in the very first part of the 2025/2026 period (i.e. probably by Summer 2025). This is considered to be incredibly unlikely given that it would rely on the site promoter submitting a planning application in advance of the adoption of the RLDP and doing so whilst the RLDP is subject to Examination (and MCC being able to robustly determine the application in the 12 month assumed timescales during this period).

It should also be noted that, of the ALDP's strategic sites, only one of the seven was submitted in advance of adoption of the ALDP. This was Wonastow Road, Monmouth which was an allocation in the previous Unitary Development Plan. This is a similar experience to in Bridgend where there were no applications for any of the strategic sites submitted in advance of adoption of the RLDP and where no applications have been submitted since its adoption in March 2024.

The above analysis is generous to the promoters of the Land to the East of Caldicot/North of Portskewett site in that it assumes first completion at the point where development commences onsite where-as clearly this will not be the case given that inherently the build process is such that a certain amount of site wide works need to take place before first completion.

With a Deposit due to be considered by Full Council in October 2024 and Examination likely to take place across much of 2025, a submission being made in the 2026/2027 period when the RLDP has been adopted would feel more likely as this is the point that there would be the certainty to progress a planning application.

The ALDP Housing Delivery Table at Appendix E provides the average length of time that it took between the submission of a first planning application and completion of the first house onsite across the seven strategic sites within the ALDP. This shows an average period of time from the submission of the first application to first completion of a property of four years, with a range between two and six years though little relationship of these timescales and the size of a site.

All of the strategic sites that are allocated in the ALDP are considerably smaller than the Land to the East of Caldicot/North of Portskewett site and therefore the above timescales, whilst very helpful, do not reflect how these timescales are impacted for larger sites.

The Lichfields' Paper is therefore useful in that it provides a more forensic analysis of these timescales for sites of varying sizes across the UK. It is considered that the 1,000 to 1,499 category is the right one to include the Land to the East of Caldicot/North of Portskewett site within. Whilst the site is to deliver 770 homes within the RLDP plan period, the Preferred Strategy identifies the site as having capacity for 1,460 homes and its size (and the composition of the candidate sites that form it) remains unchanged.

According to the Litchfield's paper, for sites of between 1,000 and 1,499 homes, it takes on average 6.2 years from the submission of a first planning application through to first completion on site. This breaks down into 4.9 years for the consideration of all necessary planning applications and 1.3 years between then and first completion.

There are also added complexities given how the site is being promoted which probably mean that this should be seen as the minimum timescales:

The site is being promoted by two parties. This creates challenges around how a planning application is progressed and the exercise of securing a housebuilder to purchase and deliver the site;

Richborough Estates, who are promoting CS0087, is a strategic land promotor that would likely seek to secure an outline planning permission before looking to market the site, either in its entirety or in phases, to a housebuilder. This inevitably results in a delay in the delivery of homes on their portion of the site; and

Likewise, MCC, who is promoting CS0251, is not a developer and will need to market the site to a secure best value, something that is inevitably going to extend the time it takes for delivery on site. Of the two sites under MCC's control that are allocated in the adopted LDP (Land at Crick Road, Portskewett and Land at Chepstow Road, Raglan), neither delivered units within the adopted LDP plan period; and

Based on the above analysis, Taylor Wimpey's view is that it will take longer than two years between the submission of a first planning application and first completion and, in reality, is likely to take somewhere between four and five years. With a planning submission realistically more likely to be made in the 2026/2027 period rather than the 2025/2026 period for the reasons set out above, it follows that first completion is unlikely to be before 2030/2031.

Assumed Delivery Rates

The other factor that influences how many homes a site is likely to deliver over the RLDP plan period is the rate of delivery after first completion which inherently determines how long it takes for a site to be built-out.

The Housing Trajectory suggests that the Land to the East of Caldicot/North of Portskewett site will be delivered at a rate of 75 homes per year in the first year, 125 homes per year for the next five years, and then 70 homes in the final nine months of the RLDP.

The ALDP Housing Delivery Table at Appendix E provides an overview of the delivery rates achieved for the ALDP strategic sites. It's probably of limited utility given that the size of the strategic sites allocated in the ALDP are so much lower than the Land to the East of Caldicot/North of Portskewett site, but the table points to an average delivery rate of 51.5 homes per annum across all sites and all years of delivery. All of these sites would have been delivered from a single outlet with the exception of Wonastow Road, Monmouth which was delivered from two outlets.

Due to its size, it is expected that the Land to the East of Caldicot/North of Portskewett site would be delivered from two outlets and in that sense, the Lichfields Paper is helpful in that it provides a mean and median delivery rate for sites at this scale. It found that sites between 1,000 and 1,499 homes (the category that the Land to the East of Caldicot/North of Portskewett East sits within and larger than the ALDP strategic sites) were delivered at a mean rate of 90 homes per annum and a median rate of 87 homes per annum[3]. These sites were presumably delivered from two outlets – a reflection that these figures are broadly double that from the ALDP sites.

From the above, it seems that a delivery rate of 125 homes per annum is unlikely to be achieved and that a delivery rate of circa 100 homes per annum is more realistic (though still possibly remains optimistic).

Conclusion

Taking the above together, Taylor Wimpey suggests that the Land to the East of Caldicot/North of Portskewett site will not be delivered at the rate that the Housing

[3] Even in the band above, the mean delivery rate would be 110 homes and the median 104 homes – both less than the 125 forecast in the Housing Trajectory.

Trajectory suggests, both due to an underestimation of the time required for first completion but also an overestimation of assumed delivery rates after first completion.

On that basis, and as shown in the table below, it is suggested that the Land to the East of Caldicot/North of Portskewett site should be assumed to have capacity to deliver 375 homes over the RLDP plan period rather than 770 as the Housing Trajectory suggests at present.

Year	Stakeholder Group Housing Trajectory	Taylor Wimpey Suggested Housing Trajectory
2027/2028	75	0
2028/2029	125	0
2029/2030	125	0
2030/2031	125	100
2031/2032	125	100
2032/2033	125	100
2033 (Remainder)	70	75
Total in RLDP Plan Period	**770**	**375**

Please refer to submitted written representations.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	

No comment.

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	

Policy ST5 – Transport Schemes

Policy ST5 (Transport Schemes) of the Deposit RLDP identifies a series of active travel, public transport, and road improvement schemes which are to be safeguarded from prejudicial development. The 'Severn Tunnel Junction Interchange improvements (rail and bus)' is identified as a public transport improvement scheme and the 'B2425/Severn Tunnel Junction Link Road' as a road scheme. The road element of this scheme would cross land under the control of Taylor Wimpey and therefore clearly, they are a significant stakeholder to the direction that the Deposit RLDP takes on this matter.

The B2425/Severn Tunnel Junction Link Road scheme was first introduced as part of the South East Wales Transport Commission's Report published in November 2020 to consider alternatives to the M4 Relief Road / Black Route which was abandoned in June 2019. As well as identifying an aspiration to deliver additional stations along the trainline from the Severn Tunnel and Cardiff, the Report specifically recommended the improvement of vehicular access to Severn Tunnel Junction Railway Station, encouraging MCC to work with Transport for Wales to deliver a bus-priority route from the M48. No plan was formally included as part of the Report, but it was clear from the description that it would bisect land controlled under Taylor Wimpey.

Building upon this, Welsh Government consulted on the 'Improving access to Severn Tunnel' Report in March 2022. This Report effectively sought feedback as to whether this route should connect run southwards to Severn Tunnel Junction Railway Station directly from the M48 or from the B4245. Taylor Wimpey supported the approach of delivering the link from the B4245 rather than from the M48. Whilst limited information was provided at that stage as part of the consultation, Taylor Wimpey confirmed the ability for its incorporation into their proposals for the Ifton Manor Farm site, committed to contributing to its funding (if required), and suggested that it was a more proportional response to the challenge with no evidence having been provided to demonstrate the need or benefits for a link for the M48. The consultation also presented an option where a park and ride facility and transport interchange was delivered to the north east of Severn Tunnel Junction Railway Station – something that was already incorporated into Taylor Wimpey's proposal for the site.

In February 2023, the Roads Review Panel published The Future of Road Investment in Wales (the Roads Review). As well as confirming agreement with Taylor Wimpey that the most appropriate option for the link road was from the B4245, in considering the Severn Tunnel Junction Railway Station link road, it commented on Page 304 that:

> *"The access road [to STJ] would pass through land between Rogiet to the west and Caldicot to the east designated as green wedge in Monmouthshire County Council's adopted Local Development Plan 2011-2021, and currently a candidate site for housing development. If development is approved, there would be opportunity for it to be public transport oriented due to the proximity to STJ Station, and this can happen regardless of whether the link road is constructed."*

The above is important – it shows clear recognition that growth delivered alongside the Severn Tunnel Junction Railway Station would be inherently public transport orientated, regardless of whether the link road is delivered.

There are three points that Taylor Wimpey wishes to make here:

Firstly, Taylor Wimpey supports the approach taken in the Deposit RLDP of supporting the option which links to Severn Junction Railway Station from the B4245 only and not from the M48. It aligns with Taylor Wimpey's preferred option as part of the 'Improving access to Severn Tunnel' consultation and reflects the finding of the Roads Review Panel's Report in February 2023. It is also a more proportional response to the intended aims and is something that Taylor Wimpey has committed to support the delivery of.

Secondly, and linked to the first point, the approach taken in the Deposit RLDP is a peculiar one. It supports the delivery of the road improvement and sets a requirement for it to be safeguarded but then fails to show this in any way on either the Proposals Map or the Constraints Map. It's not clear how an area of land can be safeguarded from development without it being spatially shown on a plan. It is suggested that an indicative location for this route should be shown as per Option 1 of the 'Improving access to Severn Tunnel' Report in March 2022, this being the last visual representation of the route's orientation. This aligns with the location of the link shown in the masterplanning work undertaken by Taylor Wimpey.

Thirdly, the Deposit RLDP does not respond to the opportunities that the delivery of the link road provides to Severnside. There are two points here:

The 2023 Roads Review highlights the sustainability of new housing next to Severn Tunnel Junction Railway Station which the Deposit RLDP does not realise; and
There is no recognition of the impact that a new link road will have on the local landscape, its suitability as a Green Wedge, or the settlement pattern in this location. Put another way, the Deposit RLDP fails to take an opportunity to deliver new housing in a highly sustainable location which has a changing landscape context.

Please refer to submitted written representations.

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
No comment.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	x
Please refer to submitted written representations.		

Part 3: Tests of Soundness

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? x		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x
Please refer to submitted written representations.		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? No comment.
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? No comment.

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

2411

Messrs and Mrs Evans

Professional Representations to Monmouthshire RLDP Draft Deposit Plan Including Representations for Site EA1J - West of Raglan

Date: November 19, 2024
Prepared by: Powells (As site promoter)



Introduction

This document provides detailed professional representations to the Monmouthshire Replacement Local Development Plan (RLDP) draft deposit plan consultation. It is designed to:

1. Address the **Tests of Soundness**, evaluating the RLDP's alignment with statutory requirements, national policies, and local objectives, including the suitability of Site EA1J for commercial development.
2. Advocate for the allocation of **Site EA1J: West of Raglan**, demonstrating its strategic importance, economic potential, and deliverability.
3. Provide evidence to substantiate the representations, including references to RLDP policies, site-specific assessments, and broader strategic considerations.

The overarching objective of these representations is to contribute constructively to the RLDP, ensuring it delivers sustainable economic growth and meets Monmouthshire's employment land needs.

General Comments on the Draft Deposit RLDP

Alignment with Tests of Soundness

The RLDP must meet the three statutory **Tests of Soundness** to progress through examination and adoption. Below is an evaluation of the plan against these criteria, with a focus on areas relevant to Site EA1J and its proposed commercial allocation.

Test 1: Does the plan fit?

(Consistency with other plans and strategies)

Strengths

1. **Alignment with National and Regional Policies:**
    - The RLDP aligns with **Future Wales 2040 Policy 6 (Supporting Economic Growth)** by identifying employment sites that enhance regional connectivity and economic resilience.
    - Its focus on promoting sustainable development, including green infrastructure and renewable energy initiatives, aligns well with **Planning Policy Wales (PPW12)** and the **Well-being of Future Generations Act**.
2. **Support for the Cardiff Capital Region:**
    - The RLDP reflects the objectives of the **Cardiff Capital Region City Deal**, particularly by identifying strategic employment sites like EA1J, which support job creation and economic diversification in rural areas.

3. **Integration with Local Strategies:**
    - Site EA1J aligns with Monmouthshire's Economic Development Strategy by providing a site that can attract investment, support local businesses, and reduce out-commuting for employment.

Areas for Improvement

1. **Clarity on Strategic Objectives:**
    - While the RLDP identifies key employment sites, it could better articulate how Site EA1J contributes to strategic goals for economic development, such as creating high-value jobs or supporting specific sectors.
2. **Integration of Infrastructure Improvements:**
    - The RLDP should explicitly demonstrate how proposed commercial sites, including EA1J, benefit from or contribute to regional infrastructure improvements, such as transport upgrades and utilities provision.
3. **Regional Collaboration:**
    - Additional clarity on how Site EA1J complements employment allocations in neighbouring authorities would strengthen the RLDP's alignment with regional priorities.

Test 2: Is the plan appropriate?

(Suitability based on evidence and need)

Strengths

1. **Meeting Employment Land Needs:**
    - The RLDP addresses Monmouthshire's lack of high-quality employment land, with Site EA1J offering a well-located option to meet current and future business demand.
    - By focusing on Raglan, the RLDP targets a rural area with good access to the strategic road network, increasing its attractiveness to businesses.
2. **Sustainability and Accessibility:**
    - Site EA1J benefits from proximity to the A40, ensuring excellent transport links for logistics, distribution, and commuting. Its location reduces the need for out-commuting and supports local job creation.
3. **Potential for Economic Diversification:**
    - The site provides opportunities for diverse business uses, including light industrial, office space, and logistics, which can strengthen the local economy and attract inward investment.

Areas for Improvement

1. **Robust Evidence of Market Demand:**
    - While the RLDP identifies EA1J as a strategic employment site, additional market demand assessments would strengthen the case for its allocation. Inclusion of evidence of interest from specific sectors or businesses could bolster its justification.
2. **Environmental Considerations:**
    - The RLDP should provide greater detail on how potential environmental impacts, such as traffic generation or landscape changes, will be mitigated for sites like EA1J.
3. **Alignment with Housing Growth:**
    - The RLDP could better articulate how employment growth at EA1J aligns with housing growth in Raglan and surrounding areas, ensuring that jobs are accessible to local residents.

Test 3: Will the plan deliver?

(Practicality and adaptability of the RLDP)

Strengths

1. **Infrastructure Readiness:**
    - Site EA1J is strategically located near existing transport infrastructure, including the A40 and public transport links, minimising the need for significant upgrades.
2. **Viability Assessments:**
    - The RLDP includes viability assessments that confirm the financial deliverability of key employment allocations, providing confidence in the feasibility of Site EA1J.
3. **Monitoring and Flexibility:**
    - The inclusion of monitoring frameworks demonstrates Monmouthshire's commitment to adaptability and responsiveness to changing economic circumstances.

Areas for Improvement

1. **Specific Delivery Timelines:**
    - Clearer timelines for infrastructure improvements and site preparation are needed to demonstrate how EA1J will be delivered within the RLDP period.

2. **Contingency Plans:**
    - Introducing contingency measures, such as alternative employment land allocations, would strengthen the RLDP's ability to adapt to unforeseen challenges or under-delivery.

Justification for the Allocation of Site EA1J - West of Raglan

Strategic Importance

1. **Location and Connectivity:**
    - Site EA1J benefits from its proximity to the A40, providing excellent access to regional and national transport networks. This makes it an attractive location for businesses in logistics, manufacturing, and office-based industries.
2. **Economic Growth Potential:**
    - The site supports Monmouthshire's goal of reducing out-commuting by creating local employment opportunities, retaining talent within the county, and supporting economic growth in rural areas.
3. **Support for Local Businesses:**
    - The allocation provides a platform for local businesses to expand, supporting economic resilience and diversification in Raglan and surrounding areas.

Sustainability and Placemaking

1. **Environmental Considerations:**
    - The site design will incorporate green infrastructure, sustainable drainage systems, and landscaping to mitigate visual and ecological impacts.
    - Renewable energy opportunities, such as solar panels on industrial units, could further enhance the sustainability credentials of EA1J.
2. **Integration with the Local Community:**
    - The development will provide local employment opportunities, reducing the need for residents to commute long distances for work. This aligns with Monmouthshire's sustainability goals and supports community cohesion.

Section Conclusion

Site EA1J: West of Raglan is a strategically significant employment allocation that addresses Monmouthshire's need for high-quality commercial land. Its location, economic potential, and sustainability features make it an ideal candidate for inclusion within the RLDP. By allocating EA1J, the Council can support local job creation, economic resilience, and sustainable growth, ensuring the RLDP delivers on its objectives.

Conclusion

Our representations highlight that the Monmouthshire Replacement Local Development Plan (RLDP) presents a robust framework for guiding sustainable growth across the county. However, to ensure the plan meets the statutory **Tests of Soundness** and progresses successfully through examination, several refinements and justifications are required.

In the case of **Site EA1J: West of Raglan**, we strongly support its allocation as a strategic employment site. This site offers significant potential to address Monmouthshire's critical need for high-quality commercial land and to support the Council's broader objectives for economic growth and sustainability. Key benefits of the site include:

1. **Strategic Location and Connectivity:**
    - Proximity to the A40 ensures excellent access to regional and national transport networks, making it highly attractive for a variety of business uses, including logistics, light industrial, and office-based employment.
2. **Economic Growth and Local Resilience:**
    - By providing much-needed employment land, the site supports job creation, reduces out-commuting, and encourages local economic activity, strengthening Monmouthshire's economic resilience.
    - The allocation aligns with regional and national strategies, including **Future Wales 2040** and the **Cardiff Capital Region City Deal**, promoting long-term economic growth.
3. **Sustainability and Environmental Considerations:**
    - The proposal integrates sustainable design principles, including green infrastructure, renewable energy opportunities, and mitigation of ecological impacts, ensuring the development supports Monmouthshire's commitment to net-zero carbon targets.
4. **Community Integration:**
    - The site provides local employment opportunities, reducing travel demands for residents and supporting community cohesion by retaining talent and resources within the Raglan area.

While we support the allocation, the RLDP would benefit from additional clarity on the deliverability of employment sites, including specific timelines for infrastructure readiness, measures to mitigate environmental impacts, and a stronger articulation of how regional collaboration has shaped strategic allocations such as Site EA1J. These refinements will ensure the RLDP is robust, adaptable, and capable of meeting Monmouthshire's economic and sustainability objectives.

In conclusion, the allocation of Site EA1J is an essential component of the RLDP, offering a sustainable and strategic solution to Monmouthshire's employment land needs. By addressing the recommendations outlined in these representations, the Council can ensure the RLDP delivers its vision for a resilient and thriving Monmouthshire, underpinned by strong economic foundations.

END

2416

Edenstone Homes

Land south of Newport Road Magor

VISION DOCUMENT

December 2024



EDENSTONE

high light PLANNING

Vision

The vision for land at Newport Road is to deliver a **Net Zero sustainable**, **healthy**, and **connected** extension to Magor. The development will be distinctive, integrated, responsive to local needs, and adaptable for future generations.

This vision is supported by three vision objectives, as set out on the page opposite.







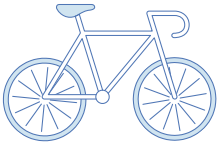
Sustainable

The proposed homes will be Net Zero demonstrating Edenstone Homes' commitment to current and future generations. They will embrace technological advances and emerging cultural trends to create places that are suitable for life today and in the future. By exploring how innovations can enhance our approach to design, construction, and management of the place so that it better meets the needs of the new community from transport, green space, energy, and community food production, we will seek to create a place that genuinely meets the evolving needs of its inhabitants.



Healthy Living

The proposals will encourage healthy and sustainable movement through a network of green and blue streets with dedicated pedestrian and cycle routes, making active travel an attractive and preferred option for local movements – trips to schools, to the shops, to work, to play areas, and open spaces. A trim trail will be provided along with recreational play facilities and community agriculture where residents can grow and consume locally produced food, maximising opportunities for positive influences on residents' overall health and lifestyle.



Connected

Land at Newport Road will be linked to the town centre via safe pedestrian routes. The development can help support the vibrancy of the town and provide areas of public open space for existing residents to utilise. Consideration of the site's identity, linkages to surroundings, local character, and natural features will be key to the development of the site. Virtual connections will be through super-fast broadband that will enable people to work from home.

Table of Contents



1 Introduction

2 Site and Surroundings

3 Understanding the Opportunity

4 Concept Masterplan

5 Placemaking

6 Summary & Next Steps



1. Introduction

Hi! We are **Edenstone Homes**, an independently-owned, award-winning developer **based in Magor** with a commitment to sustainability, good quality design and **placemaking** .

We want to provide homes to be proud of and sustainability is at the heart of everything that we do. We always strive to create homes that **enhance** the local environment and community.

In this document, we present our vision for the residential-led development of land south of Newport Road outlining the site's potential to create a high quality, well designed new neighbourhood that **successfully integrates** with Magor.

2. Site and Surroundings

The site is approximately 12 hectares made up of five field parcels located to the west of Magor town centre. It benefits from being sustainably located within easy reach of the town's numerous facilities and amenities.

The site is bound by allotments to the south, Green Moor Lane and residential properties to the east, Newport Road to the north, Magor Road and Wilcrick Maintenance Deposit to the north-west, and the A4810 to the west with Magor Brewery further afield.

The site is therefore well contained and its development would appear as an infill between existing residential and employment areas and a rounding off of the settlement

Planning Policy Context

- Adjacent to the settlement boundary of Magor;
- Partly within the M4 Safeguarding Route (which lost its protection in June 2021);
- Adjacent to a Protected Employment Site;
- Partly within a Minerals Safeguarding Area;
- Partly within an Area of Archaeological Sensitivity.

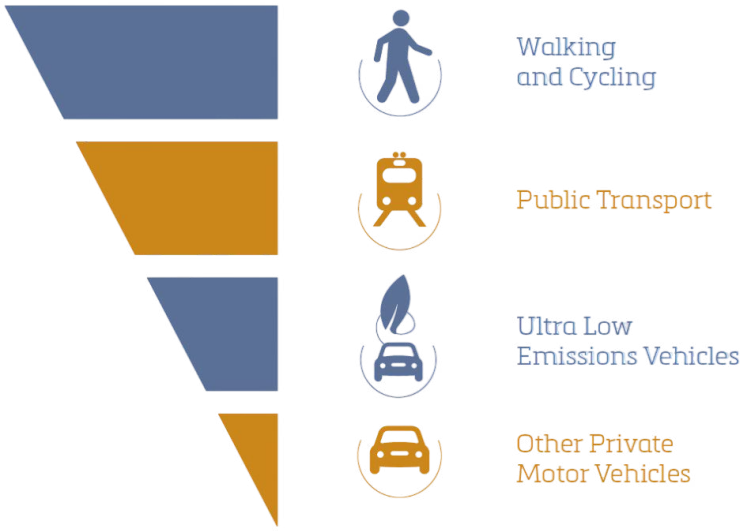
The Replacement LDP identifies Magor as one of the most sustainable settlements within the Severnside area and the County.

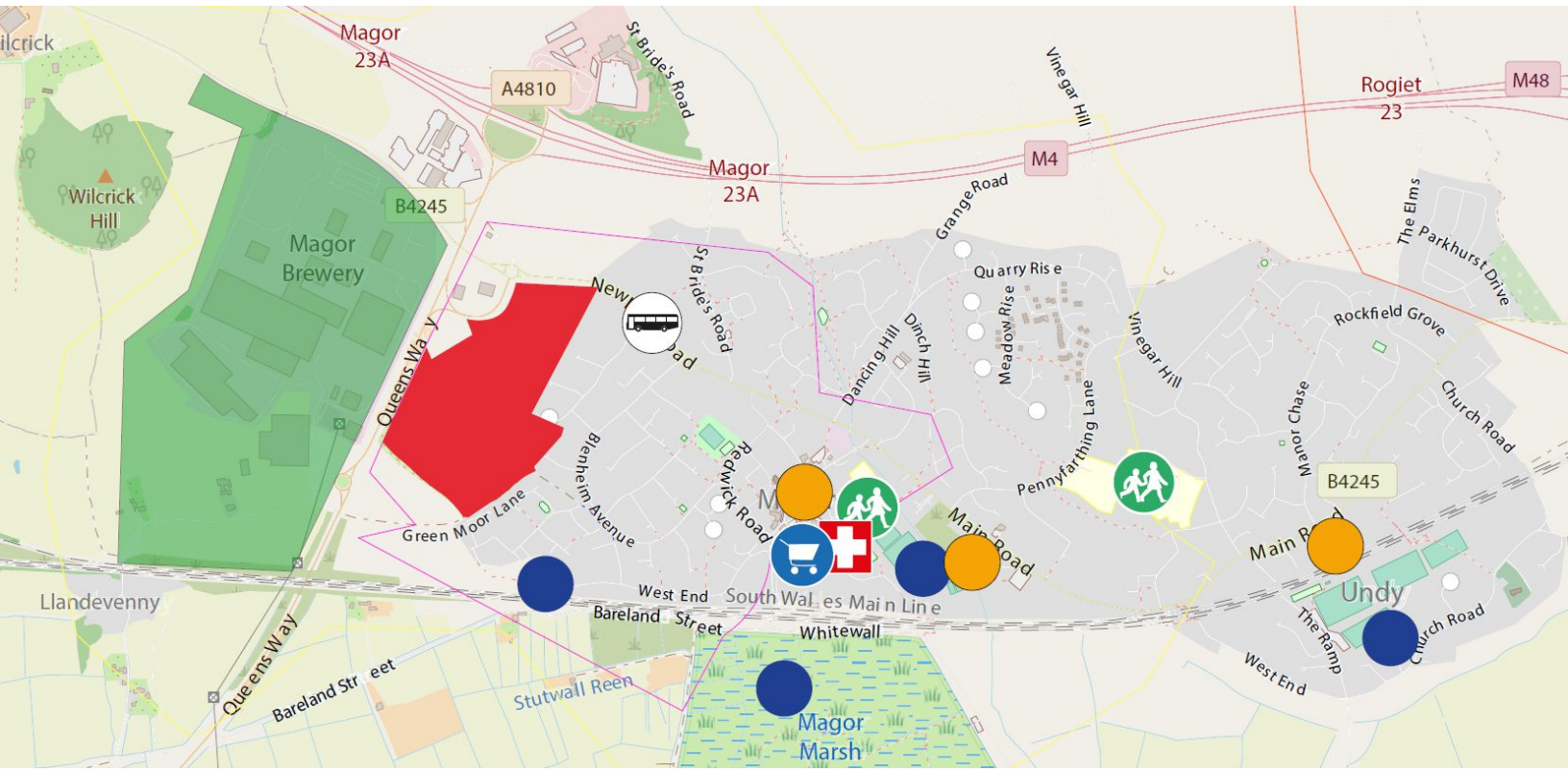

Wales 1 Business Park
M4 J33
Magor Brewery
B2425
The Site
Magor
Green Moor Lane Allotments

Access & Movement

The site is strategically well-located being within easy reach to the east of employment opportunities at Magor Brewery and Magor 1 as well as within a relatively short walk / cycle to the town centre to the east, which includes a range of facilities and amenities.

The development of the site would therefore comply with the sustainable transport hierarchy.





10 Minute Walking Isochrones

20 Minute Walking Isochrones

30 Minute Walking Isochrones

Site Location

Bus Stop

School

Local Shop

Medical Facility

Restaurant / Cafe

Sports / Leisure Facility

Employment Site

3. Understanding the Opportunity

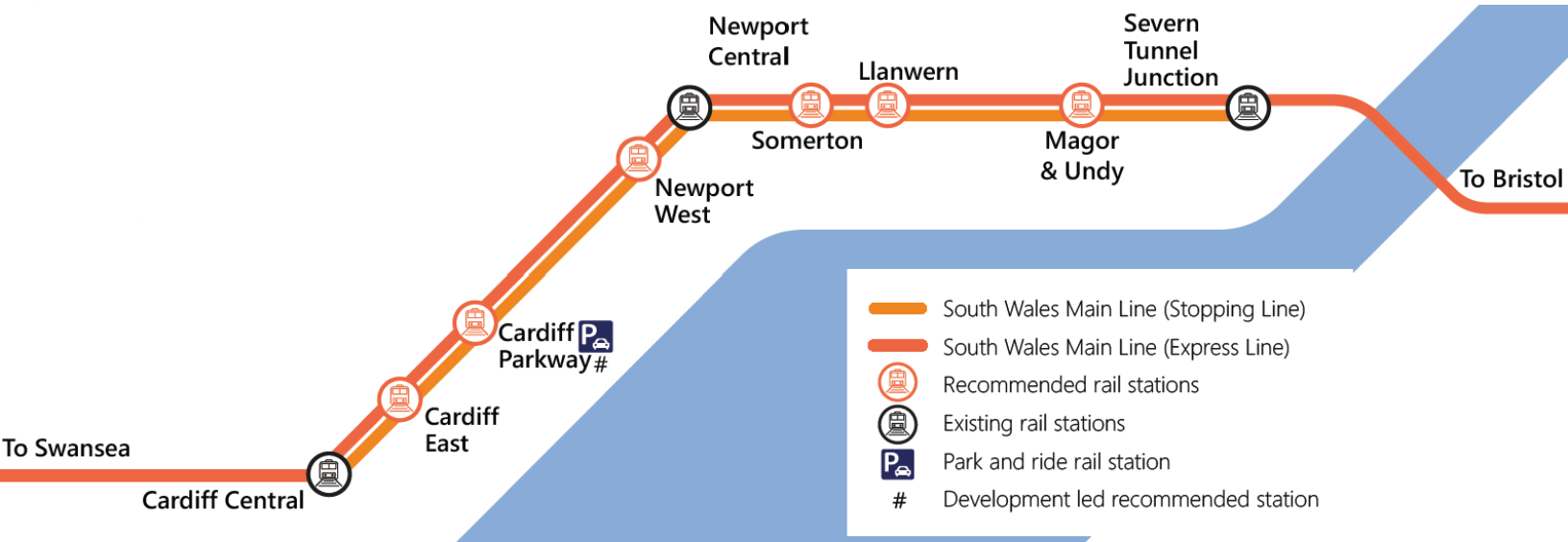
The proposals are being advanced by a project team comprised of Edenstone Homes, Highlight Planning, SLR, Archaeology Wales, Viridian Landscape, Hunter Acoustics, PHG Consulting, Burrows Ecological Consultants, Pure Ecology and Reading Agricultural Consultants.

The team have comprehensively assessed the site and its context to identify the emerging constraints and opportunities relevant to the development. The main opportunities include:

- The site's central location within easy reach of a range of facilities, amenities and employment opportunities.

- Pedestrian and cycle connections can be accommodated into the site. Links to the east would provide safe and convenient access to the town centre.

- Initial assessments undertaken by SLR demonstrate that the proposed development would have an acceptable impact on the local highway network. Effective travel planning and active travel measures would further support the sustainability of the site. The Burns Delivery Unit Prospectus (2024) outlines a timeline of 2025-2030 for the construction of the Magor Walkway station with Future Wales stating that opportunities for development should be maximised around Metro stations.



- The site is concluded to be at “low risk” of flooding from all assessed sources and is not located within a Special Area of Conservation (SAC) area affected by phosphates and can therefore come forward early within the plan period assisting with the resilience of the RLDP’s housing land supply.

- To support placemaking and legibility, a network of green blue streets are proposed with formal and informal areas of open space provided throughout the site. The site is capable of delivering a sustainable drainage strategy with the provision of SuDS features throughout.

- Green infrastructure corridors can be incorporated into the proposals enabling strategic, natural movement through the site. Additional landscaping will be incorporated to enhance this feature and create a strong link with the surrounding open landscape. An extension to the adjacent allotments can be provided to support the local community.

- The site is visually well contained by the combined screening effect of local topography and existing vegetation, allotments to the south, major roads to the north and west along with the large scale Magor Brewery further west.

- There is potential for measures to support climate resilience to be incorporated into the scheme – both in terms of site layout and design and building fabric.

- There are no significant constraints to development from the presence of utilities infrastructure.





4. Concept Masterplan

This proposed development is to be green infrastructure-led and will provide residential development along with significant areas of open space.

The proposals can be progressed in a phased manner such that the entirety of the site comes forward through the Replacement LDP or a smaller northern section of the site.

The development would include:

- Meeting local needs through the provision of approximately 240 homes along with a care home (whole site) or 150 homes as a first phase.

- Integration with the town centre providing linkages through existing residential areas to the east of the site.

- The delivery of open space areas which will be multifunctional and accommodate areas for recreation, attenuation and ecological enhancement, whilst retaining existing tree and hedgerow planting wherever possible. Open spaces will be linked via trim trails and a network of attractive blue green streets that are overlooked by development. Allotments would be provided as part of the whole site development.

- A layout that ensuring that all areas of the development are accessible and legible through a clear hierarchy of streets.

- The provision of a single vehicular access points on to Newport Road.

- Development will accord with the SuDS Statutory Guidance.

- The proposed homes will be Net Zero demonstrating Edenstone Homes' commitment to current and future generations.



Whole Site Masterplan



Northern Phase Masterplan



5. Placemaking

The development supports the **Placemaking Principles** outlined in the **Placemaking Wales Charter** in the following ways:

1. People and Community

Social Integration: The proposed development includes a mix of housing types (including market housing, 50% affordable housing, and potential bungalows), catering to diverse demographics.

Green Infrastructure: The incorporation of multi-functional open spaces, recreational areas, and community food-growing facilities (such as allotments) enhances social interaction and promotes physical and mental well-being.

Active Living: The development encourages active lifestyles through the provision of pedestrian and cycle routes, green-blue streets, and a trim trail, allowing residents to connect with each other and the surrounding environment.

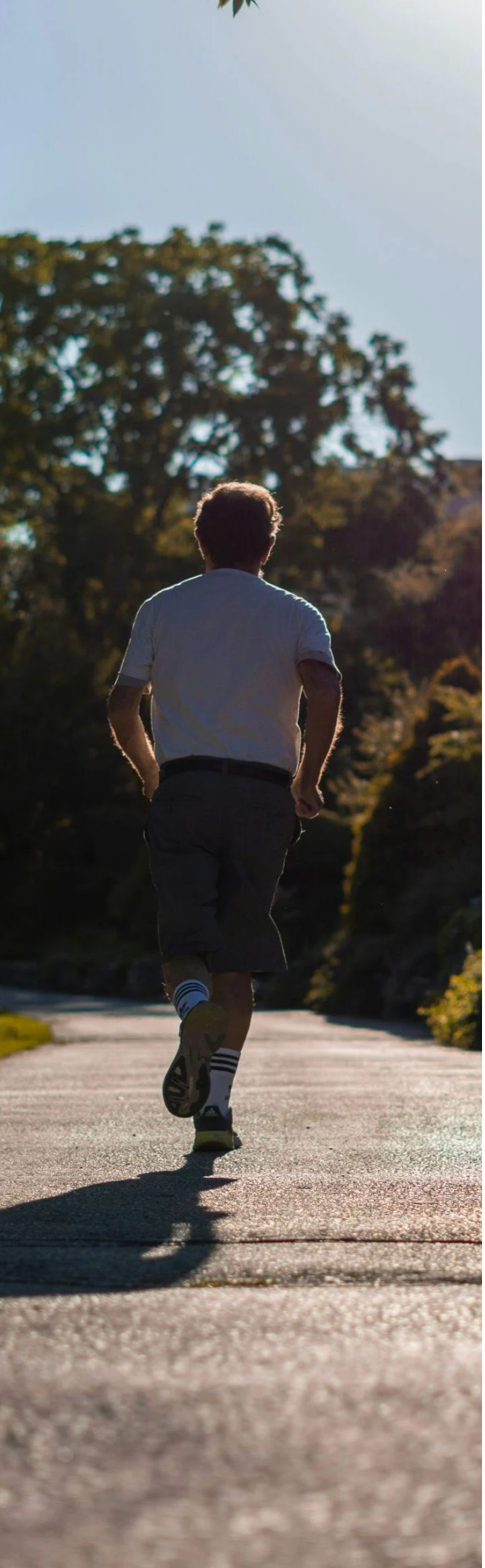
2. Location

Proximity to Town Centre: The development is located within easy reach of Magor's centre, which provides a range of amenities such as schools, shops, and medical facilities, fostering a walkable, neighbourhood.

Transport Connectivity: The development is well-connected by existing transport routes, and pedestrian/cycle links will further enhance accessibility. The proximity to the proposed Magor Walkway railway station will provide sustainable transport options, supporting the town's long-term growth and resilience.

Integration with Existing Infrastructure: The site is adjacent to existing residential areas and employment hubs like Magor Brewery, ensuring it complements the existing fabric of the town and is well-positioned to support its growth.





3. Movement

Active Travel: The development will positively integrate a comprehensive network of pedestrian and cycle routes, prioritising non-motorised travel. These routes will connect to the town centre, schools, parks, and local amenities, encouraging walking and cycling as preferred modes of transport.

Public Transport Integration: The site is well connected to existing and proposed public transport.

4. Mix of Uses

Residential and Community Facilities: The site will provide a mix of housing (market, affordable, and potentially bungalows), along with communal amenities like allotments, recreational areas, and a care home (should a larger allocation come forward). The site is also well positioned in terms of access to existing employment areas.

Public Open Spaces: The integration of multifunctional open spaces with recreational, ecological, and flood attenuation functions promotes a diverse range of uses within the site, offering spaces for play, leisure, and socialising.

Local Food Production: The inclusion of community food-growing areas supports sustainable living and creates opportunities for residents to engage with local food production, fostering community resilience.



5. Public Realm

Green and Blue Streets: The development's green-blue streets will be designed to provide a pleasant, walkable environment. These streets will be lined with trees and green infrastructure, enhancing the aesthetic appeal of the area while also improving air quality and biodiversity.

Recreational and Social Spaces: Public spaces such as play areas, trim trails, and allotments will be accessible from most dwellings, offering opportunities for social interaction and recreation. These spaces are designed to promote community engagement, safety, and well-being.

Sustainable Drainage: SuDS features, including ponds and swales, will enhance the visual quality of the public realm while managing surface water effectively, ensuring resilience against flooding.



6. Identity

Distinctive Design: The architectural style will draw upon local character and materials, ensuring that the development blends harmoniously with its surroundings. Locally, red and buff brick are used along with rendered housing. Higher density is found to the south east at Seymour Way with the density decreasing as you move northwards towards Blenheim Gardens and Queens Gardens.

Green Infrastructure and Heritage: The integration of green corridors, retention of existing trees, and the inclusion of local food production areas will enhance the site's connection to its natural environment, reinforcing its identity as a sustainable, community-focused development.

Public Art: Incorporating public art into the proposals will create a strong link to the area's historical and environmental context, fostering pride in the place.







Whole Site Masterplan Illustrative Visual



Central Open Space Area Illustrative Visual



6. Summary

Land at Newport Road, Magor can deliver a **sustainable**, **healthy** and **connected** extension to Magor. The development will be **distinctive**, **integrated**, **responsive** to local needs and adaptable for **future generations**.

Edenstone and the project team look forward to working collaboratively with the local community and key stakeholders in creating the new neighbourhood.

The development provides the following benefits:



A distinctive and responsive high quality development which delivers approximately 240 homes along with a care home.



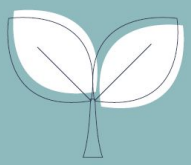
A development that is best placed to accommodate the necessary growth of Magor being located closest to the town centre and existing areas of employment at Magor Brewery and Wales 1. Development of the site will integrate successfully with the town centre.



A comprehensive and robust masterplan that has been informed by technical studies, site and context assessment, with the aspiration to ensure that areas of development are guided by a green infrastructure led approach.



A masterplan that promotes the creation of a safe, active and legible place and benefits from significant provision of multi-functional open space that is accessible to all.



A development with sustainability at its heart being best located for access to the village centre and the proposed new Walkway train station and designed to be Net Zero.

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Edenstone Homes	Highlight Planning
Address:		[redacted]
Telephone No:		
Email:		

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We support the Council's identification of key issues, challenges and opportunities, which point towards the need to secure growth at appropriate sustainably located deliverable sites. The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation. For the reasons outlined within the Stage 2 Candidate Site submission and enclosed Vision Document, the proposed development of land south of Newport Road, Magor aligns with the RLDP Vision and will contribute to the achievement of the 17 RLDP Objectives identified within the Preferred Strategy.

Based on the revised RLDP Delivery Agreement (agreed with Welsh Government in October 2024), the RLDP will be adopted in March 2026. This is some 8 years after the proposed start date of the RLDP Plan Period (of 2018) and only some 7 years before the end of the plan period (of 2033). The original RLDP Delivery Agreement (April 2018) proposed that the RLDP be adopted in December 2021 (some 4 and a quarter years before is now proposed). Should there be any further slippage to the preparation of the plan the operational life of the RLDP will be reduced even further. Consequently, we would suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Para 1.1.6 states that it has been informed by a wide range of evidence and responds to challenges which have arisen since the previous Preferred Strategy was consulted on in Summer 2021, namely the Welsh Government's objection to the level of growth set out in the Preferred Strategy. The resultant housing requirement pursued in the Deposit RLDP remains a significant reduction when compared with the Summer 2021 Preferred Strategy. Whilst we acknowledge and appreciate that the Council have had to temper the level of growth pursued due to Welsh Government's objection, we would question whether the evidence base supports the reduced level of growth compared with the Summer 2021 Preferred Strategy.

Whilst we commend the Council in challenging and going beyond the Welsh Government's prescribed maximum growth of 6,210 homes over the Plan Period, we consider that the housing requirement does not provide sufficient growth to redress negative demographic trends for Monmouthshire and harness its economic potential.

Monmouthshire has an ageing population. Between the last two censuses, the average (median) age of Monmouthshire increased by four years, from 45 to 49 years of age. It had a higher average (median) age than nearby Torfaen (42 years) and the joint second-highest average (median) age in Wales (alongside Conwy and behind Powys). The number of people aged 65 to 74 years rose by around 2,500 (an increase of 25.1%), while the number of residents between 35 and 49 years fell by just under 3,800 (19.4% decrease). The share of residents aged between 65 and 74 years increased by 2.5 percentage points between 2011 and 2021. The ageing population will have significant negative implications for the County, including for services and infrastructure, particularly schools with a reduction in school age children. A greater level of growth is required to ensure that communities are balanced and socially sustainable in terms of demography and to help sustain services and facilities and harness and secure further infrastructure delivery.

Monmouthshire is located within Cardiff Capital Region (CCR) which through the City Deal is seeking to increase the number of jobs in the region by 25,000. It will be essential to demonstrate how the targeted increase in population/jobs can be achieved in a way which is compatible and consistent with the LDP strategies of the other LPAs in the CCR. The Council have previously stated that Monmouthshire has *"a once in a generation opportunity to reconsider its future direction. Monmouthshire's unique border county location, the Council's decision to participate in the Cardiff Capital City Region ('CCR') City Deal, and the UK Government's decision to remove the Severn Bridge Tolls in 2018, all present a rare chance for Monmouthshire to become a key economic growth area in the CCR"* (MCC Economic and Development Select Committee: Economies of the Future analysis. Feb 2018). The level of housing growth proposed within the Preferred Strategy does not harness the economic opportunity presented by the CCR City Deal.

The Preferred Strategy recognises that issues of affordability in the County impact on the ability of young people being able to form their own households with the 2021 Census showing a 14% increase in households with non-dependent children. The Preferred Strategy principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on new allocations. Whilst we fully support the Council in looking to address issues of

affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

Flexibility Allowance

A 15% flexibility allowance is proposed within the Preferred Strategy. Given the context within which the RLDP is being prepared (being initially triggered by the failure to address the shortfall of housing land supply within the Authority Area) we consider that a flexibility allowance of 20% should be adopted. Increasing the flexibility allowance from 15% to 20% would provide greater contingency to allow for unforeseen circumstances over the plan period, which will be particularly important given the current uncertainties in the economic climate and the Deposit RLDP's reliance on a small number of strategic sites to deliver a significant component of the RLDP's housing requirement.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

The general approach to Strategic Policy S2 in the context of Edenstone Home's promotion of land south of Newport Road is supported as it distributes the greatest level of growth to Severnside. Magor is identified as a Tier 2 settlement within the Severnside Area. With the exception of Caldicot, Magor Undy is significantly more sustainable as a settlement than any other within the Severnside region (as set out within the Council's Sustainable Settlement Appraisal, December 2022). The Sustainable Settlement Appraisal makes no reference to how proposed infrastructure could potentially enhance the sustainability of settlements. A significant component of the CCR City Deal investment relates to establishing the South Wales Metro, which seeks to facilitate connectivity and travel-to-work across the region. The proposed Magor Walkway train station forms a component of the Metro and was endorsed by the South East Wales Transport Commission. More recently, the Burns Delivery Unit Prospectus was released in October 2024 and outlines a timeline of 2025-2030 for the construction of the Magor Walkway station. The station will enhance the sustainability of Magor and land south of Newport Road sits in closest proximity to the proposed station. Its allocation would therefore accord with the aspirations for Transit Orientated Development and support for the Metro, as set out in Future Wales 2040. Policy 36 states: *"Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations"*. As it stands, the Deposit RLDP does

not accord with Future Wales Policy 12 and Policy 36 as there is no alignment between housing growth and the investment proposed in the Metro at Magor.

Delivering strategic growth to the South of the County (in placed like Magor) has the potential to lead to positive effects through capitalising upon the strategic links to the Great Western Cities, Cardiff Capital Region, and SW/ Bristol region

Whilst we support the Council in setting out a proportional distribution of growth towards the most sustainably located settlements, ensuring that Magor receives a proportional amount of growth within the Severnside region (with it being significantly more sustainable than Rogiet, Caerwent, Crick, Portskewett and Sudbrook) will be key to ensuring the sustainability and resilience of communities. This is particularly the case given the increased emphasis on sustainability through the emerging RLDP when compared with the current LDP and the requirement to accord with the WBFG Act. Should Magor not receive a proportionate amount of growth within the RLDP, there would be significant concerns around the soundness of the RLDP.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S4

Policy S4 outlines climate change measures that all development proposals '<u>will</u> include' (emphasis added). Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

Whilst supportive of the shift to a low carbon economy and recognising that new development has the potential to deliver innovative approaches to climate change mitigation (such as that proposed by Edenstone Homes at land south of Newport Road, Magor), any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge. As set out within the Viability Guidance Note, viability will be key to ensuring that a balanced and sustainable approach is adopted in responding to the Climate Emergency.

Policy NZ1

We acknowledge and support the overarching ambition of Policy NZ1 to enhance energy efficiency and sustainability standards in new residential developments. Addressing climate change and promoting net-zero carbon development are critical goals. However, we have several concerns regarding the practical implementation and implications of the policy as currently drafted. These concerns are outlined below:

Conflict with National Policy

The policy appears to conflict with **paragraph 5.8.5 of Planning Policy Wales**, which states that higher sustainable building standards should only be applied to strategic sites. Paragraph

5.8.5 emphasises that planning authorities should assess strategic sites to identify opportunities for requiring higher standards, such as zero carbon. These higher standards should be supported by robust evidence and must take into account the economic viability of schemes. Applying the standards outlined in Policy NZ1 to all residential developments, including non-strategic housing allocations, goes beyond the national policy framework and risks imposing onerous requirements on smaller sites, potentially undermining housing delivery.

Feasibility and Viability

While we recognise the importance of setting high energy efficiency standards, the specified requirements, including a space heating demand (SHD) of less than 25 kWh/m^2/yr and the generation of 40 kWh/m^2fp/yr of renewable energy, raise feasibility and financial viability issues. For example, energy modelling carried out using advanced methodologies such as Passive House Planning Package (PHPP) often yields SHD values significantly higher than the policy target. This was demonstrated in assessments of several of Edenstone's house types (e.g., Wye: 42–45 kWh/m^2/yr, Dartford: 65 kWh/m^2/yr, Tamar: 59–60 kWh/m^2/yr), even for homes designed to achieve EPC B+/A ratings.

Moreover, while achieving the target SHD via SAP may be feasible with additional costs, the policy appears to favour PHPP or similar modern methodologies, which could further increase costs and complexity. These factors may affect housing affordability and the financial viability of projects, particularly for small and medium-sized enterprises (SMEs).

Consistency and Complexity Across Local Authorities

A significant concern is the lack of consistency in energy standards across local authorities, which creates challenges for developers. Developing bespoke house types and specifications to meet differing local policies is neither practical nor financially viable. The industry would benefit from a standardised, national approach to energy performance standards, such as those proposed under Building Regulations and the Future Homes Standard. Local variation complicates feasibility modelling and risks discouraging development.

Practical Challenges in Implementation

We are also concerned about the practical challenges local authorities face in implementing and enforcing these standards. Instances from other areas, such as Cheltenham, suggest that while ambitious energy targets are set, they are often compromised during the planning process due to viability concerns or a lack of technical expertise to assess compliance. This creates inconsistencies and may undermine public confidence in the standards.

Renewable Energy Generation Requirements

The emphasis on on-site renewable energy generation is commendable, but the requirement to generate 40 kWh/m^2fp/yr or meet the annual regulated electricity demand could be overly rigid in some contexts. Achieving these targets may not always be feasible on sites with constraints such as limited roof space or shading. Furthermore, while improving building efficiency reduces the PV requirement to achieve net-zero regulated energy, adding PV to a slightly less efficient home often represents a more cost-effective path to net zero. Greater flexibility within the policy would enable site-specific, practical solutions without compromising overarching goals.

Public Perception and Communication

From a public perception standpoint, there is a risk that compromises on energy standards, even where justified on technical or viability grounds, may not be well received. It is crucial that the policy sets clear and achievable standards to avoid the need for perceived compromises, which could affect the public's perception of developers' commitments to sustainability.

Performance Gap and Compliance Costs

We support the principle of closing the performance gap through as-built performance surveys. However, this requirement introduces additional costs and administrative burdens, which could disproportionately impact SMEs. We urge careful consideration of these costs to avoid discouraging development, especially in areas with tight margins.

A Call for a Nationally Consistent Approach

While we support the policy's intent, we believe that a more consistent national approach to energy performance standards, via Building Regulations or the Future Homes Standard, would be preferable. This would provide clarity and consistency for developers across regions and ensure a level playing field, supporting the industry's ability to deliver both sustainable and affordable housing.

Conclusion

While we commend the ambition of Policy NZ1, its application to all housing allocations is inconsistent with **paragraph 5.8.5 of Planning Policy Wales**, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. We urge Monmouthshire County Council to reconsider the scope of Policy NZ1 and to align it with national guidance to maximise its effectiveness while minimising unintended consequences.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)	
Is your representation in support or objection?	Support:	
	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

Policy S5 outlines green infrastructure measures that all development proposals 'must' incorporate. Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

10. Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

HA1 Land to the east of Abergavenny

The Deposit RLDP proposes that Abergavenny East will deliver 500 homes within the plan period. Based on the revised RLDP Delivery Agreement, the RLDP will be adopted in March 2026 with there being some 7 years before the end of the plan period (of 2033) post-adoption. Whilst we await further details on the site's housing trajectory to be published, at this stage we would query whether 500 homes can realistically be delivered within the plan period. The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

- From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
- If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
- The average build out rate of sites between 500-999 dwellings is 68 homes per annum.

Abergavenny East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan-led system, the very earliest that Abergavenny East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 68 homes per annum from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 500 homes currently assumed in the Preferred Strategy.

HA2 Land to the East of Caldicot/North of Portskewett

For the reasons outlined below, it is considered that land south of Newport Road, Magor would best contribute to the vision and objectives of the RLDP and the achievement of sustainable development within the Severnside region when compared with Caldicot East:

- Landscape sensitivity to residential development is high/medium which is higher (more sensitive) than land south of Newport Road, Magor.
- In terms of agricultural land, the area is classified as predictive grade 1 and 2 BMV land, which is the highest predictive grade of agricultural land. Development in lower grades and non BMV land (such as that at land south of Newport Road, Magor) should be considered in the search sequence in advance of BMV land (as set out in Para 3.59 of PPW).
- It is located a greater walking distance from the town centre than Land south of Newport Road, Magor is to the centre of Magor – being 22 minutes walking distance from the town centre and 33 minutes from the railway station, and therefore not meeting the Council's aspirations for 20 minute neighbourhoods.
- The Preferred Strategic Site Allocation Area includes areas of flood risk, as shown on the draft Flood Risk Map for Planning.
- Caldicot East has the potential to impact upon Caldicot Conservation Area and Caldicot Castle Grade I Listed Building and Scheduled Monument, whereas land south of Newport Road is free from any heritage constraint.

The Preferred Strategy proposes that Caldicot East will deliver 770 homes within the plan period. The conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research outlined above in respect of Abergavenny East are relevant in respect of the plan period contribution of Caldicot East.

Caldicot East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published and the very earliest that Caldicot East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 107 homes per annum (based on Lichfield's research) from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 770 homes currently assumed in the Preferred Strategy.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

N/A

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

13.	Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

N/A

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. In summary, the key messages outlined within these representations are that they: • Support the Council in seeking to achieve economic growth, however we consider that: o the reduction in the housing requirement compared with the Summer 2021 Preferred Strategy is not justified and based on a sufficient evidence base; o an increased housing requirement should be pursued to align with MCC's wider growth aspirations and to harness the opportunities presented in the area; o an increase in the flexibility allowance (from 15% to 20%) should be considered; o the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement;		

- Demonstrate that the best option for growth in Severnside would be through the allocation of land south of Newport Road, Magor as it would contribute to the vision and objectives of the RLDP and the achievement of sustainable development; and
- Object to the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	x
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The Deposit RLDP fails Test 1 (Does the Plan fit) as an increased housing requirement should be pursued to align with MCC's wider growth aspirations. Moreover, it does not accord with Future Wales Policy 12 and Policy 36 as there is no alignment between housing growth and the investment proposed in the Metro at Magor.

The Deposit RLDP fails Test 3 (Will the Plan deliver) as an increase in the flexibility allowance (from 15% to 20%) should be considered and the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement. Moreover, the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

2419

Edenstone Homes

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		
Job Title: (where relevant)		
Organisation: (where relevant)	Edenstone Homes	Highlight Planning
Address:		
Telephone No:		[redacted]
Email:		

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We support the Council's identification of key issues, challenges and opportunities, which point towards the need to secure growth at appropriate sustainably located deliverable sites. The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation. For the reasons outlined within the Stage 2 Candidate Site submission (and additional documents submitted in Jan 2023), the proposed development of Land West of Trem yr Ysgol, Penperlleni aligns with the RLDP Vision and will contribute to the achievement of the 17 RLDP Objectives identified within the Preferred Strategy.

Based on the revised RLDP Delivery Agreement (agreed with Welsh Government in October 2024), the RLDP will be adopted in March 2026. This is some 8 years after the proposed start date of the RLDP Plan Period (of 2018) and only some 7 years before the end of the plan period (of 2033). The original RLDP Delivery Agreement (April 2018) proposed that the RLDP be adopted in December 2021 (some 4 and a quarter years before is now proposed). Should there be any further slippage to the preparation of the plan the operational life of the RLDP will be reduced even further. Consequently, we would suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Para 1.1.6 states that it has been informed by a wide range of evidence and responds to challenges which have arisen since the previous Preferred Strategy was consulted on in Summer 2021, namely the Welsh Government's objection to the level of growth set out in the Preferred Strategy. The resultant housing requirement pursued in the Deposit RLDP remains a significant reduction when compared with the Summer 2021 Preferred Strategy. Whilst we acknowledge and appreciate that the Council have had to temper the level of growth pursued due to Welsh Government's objection, we would question whether the evidence base supports the reduced level of growth compared with the Summer 2021 Preferred Strategy.

Whilst we commend the Council in challenging and going beyond the Welsh Government's prescribed maximum growth of 6,210 homes over the Plan Period, we consider that the housing requirement does not provide sufficient growth to redress negative demographic trends for Monmouthshire and harness its economic potential.

Monmouthshire has an ageing population. Between the last two censuses, the average (median) age of Monmouthshire increased by four years, from 45 to 49 years of age. It had a higher average (median) age than nearby Torfaen (42 years) and the joint second-highest average (median) age in Wales (alongside Conwy and behind Powys). The number of people aged 65 to 74 years rose by around 2,500 (an increase of 25.1%), while the number of residents between 35 and 49 years fell by just under 3,800 (19.4% decrease). The share of residents aged between 65 and 74 years increased by 2.5 percentage points between 2011 and 2021. The ageing population will have significant negative implications for the County, including for services and infrastructure, particularly schools with a reduction in school age children. A greater level of growth is required to ensure that communities are balanced and socially sustainable in terms of demography and to help sustain services and facilities and harness and secure further infrastructure delivery.

Monmouthshire is located within Cardiff Capital Region (CCR) which through the City Deal is seeking to increase the number of jobs in the region by 25,000. It will be essential to demonstrate how the targeted increase in population/jobs can be achieved in a way which is compatible and consistent with the LDP strategies of the other LPAs in the CCR. The Council have previously stated that Monmouthshire has *"a once in a generation opportunity to reconsider its future direction. Monmouthshire's unique border county location, the Council's decision to participate in the Cardiff Capital City Region ('CCR') City Deal, and the UK Government's decision to remove the Severn Bridge Tolls in 2018, all present a rare chance for Monmouthshire to become a key economic growth area in the CCR"* (MCC Economic and Development Select Committee: Economies of the Future analysis. Feb 2018). The level of housing growth proposed within the Preferred Strategy does not harness the economic opportunity presented by the CCR City Deal.

The Preferred Strategy recognises that issues of affordability in the County impact on the ability of young people being able to form their own households with the 2021 Census showing a 14% increase in households with non-dependent children. The Preferred Strategy principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on new allocations. Whilst we fully support the Council in looking to address issues of

affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

Flexibility Allowance

A 15% flexibility allowance is proposed within the Preferred Strategy. Given the context within which the RLDP is being prepared (being initially triggered by the failure to address the shortfall of housing land supply within the Authority Area) we consider that a flexibility allowance of 20% should be adopted. Increasing the flexibility allowance from 15% to 20% would provide greater contingency to allow for unforeseen circumstances over the plan period, which will be particularly important given the current uncertainties in the economic climate and the Deposit RLDP's reliance on a small number of strategic sites to deliver a significant component of the RLDP's housing requirement.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	x
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. We support the Council in allocation a level of housing growth to Tier 2 settlements such as Penperlleni. This level of growth is required to contribute to their vitality and attractiveness to retain younger people.		

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

N/A

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

6.	Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)	
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S4

Policy S4 outlines climate change measures that all development proposals '<u>will</u> include' (emphasis added). Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

Whilst supportive of the shift to a low carbon economy and recognising that new development has the potential to deliver innovative approaches to climate change mitigation (such as that proposed by Edenstone Homes at land west of Trem yr Ysgol), any climate change related policy in the RLDP should make clear that it is not solely for new developments to address the climate change challenge. As set out within the Viability Guidance Note, viability will be key to ensuring that a balanced and sustainable approach is adopted in responding to the Climate Emergency.

Policy NZ1

We acknowledge and support the overarching ambition of Policy NZ1 to enhance energy efficiency and sustainability standards in new residential developments. Addressing climate change and promoting net-zero carbon development are critical goals. However, we have several concerns regarding the practical implementation and implications of the policy as currently drafted. These concerns are outlined below:

Conflict with National Policy

The policy appears to conflict with **paragraph 5.8.5 of Planning Policy Wales**, which states that higher sustainable building standards should only be applied to strategic sites. Paragraph 5.8.5 emphasises that planning authorities should assess strategic sites to identify opportunities for requiring higher standards, such as zero carbon. These higher standards should be supported by robust evidence and must take into account the economic viability of schemes. Applying the standards outlined in Policy NZ1 to all residential developments, including non-strategic housing allocations, goes beyond the national policy framework and risks imposing onerous requirements on smaller sites, potentially undermining housing delivery.

Feasibility and Viability

While we recognise the importance of setting high energy efficiency standards, the specified requirements, including a space heating demand (SHD) of less than 25 kWh/m^2/yr and the generation of 40 kWh/m^2fp/yr of renewable energy, raise feasibility and financial viability issues. For example, energy modelling carried out using advanced methodologies such as Passive House Planning Package (PHPP) often yields SHD values significantly higher than the policy target. This was demonstrated in assessments of several of Edenstone's house types (e.g., Wye: 42–45 kWh/m^2/yr, Dartford: 65 kWh/m^2/yr, Tamar: 59–60 kWh/m^2/yr), even for homes designed to achieve EPC B+/A ratings.

Moreover, while achieving the target SHD via SAP may be feasible with additional costs, the policy appears to favour PHPP or similar modern methodologies, which could further increase costs and complexity. These factors may affect housing affordability and the financial viability of projects, particularly for small and medium-sized enterprises (SMEs).

Consistency and Complexity Across Local Authorities

A significant concern is the lack of consistency in energy standards across local authorities, which creates challenges for developers. Developing bespoke house types and specifications to meet differing local policies is neither practical nor financially viable. The industry would benefit from a standardised, national approach to energy performance standards, such as

those proposed under Building Regulations and the Future Homes Standard. Local variation complicates feasibility modelling and risks discouraging development.

Practical Challenges in Implementation

We are also concerned about the practical challenges local authorities face in implementing and enforcing these standards. Instances from other areas, such as Cheltenham, suggest that while ambitious energy targets are set, they are often compromised during the planning process due to viability concerns or a lack of technical expertise to assess compliance. This creates inconsistencies and may undermine public confidence in the standards.

Renewable Energy Generation Requirements

The emphasis on on-site renewable energy generation is commendable, but the requirement to generate 40 kWh/m^2fp/yr or meet the annual regulated electricity demand could be overly rigid in some contexts. Achieving these targets may not always be feasible on sites with constraints such as limited roof space or shading. Furthermore, while improving building efficiency reduces the PV requirement to achieve net-zero regulated energy, adding PV to a slightly less efficient home often represents a more cost-effective path to net zero. Greater flexibility within the policy would enable site-specific, practical solutions without compromising overarching goals.

Public Perception and Communication

From a public perception standpoint, there is a risk that compromises on energy standards, even where justified on technical or viability grounds, may not be well received. It is crucial that the policy sets clear and achievable standards to avoid the need for perceived compromises, which could affect the public's perception of developers' commitments to sustainability.

Performance Gap and Compliance Costs

We support the principle of closing the performance gap through as-built performance surveys. However, this requirement introduces additional costs and administrative burdens, which could disproportionately impact SMEs. We urge careful consideration of these costs to avoid discouraging development, especially in areas with tight margins.

A Call for a Nationally Consistent Approach

While we support the policy's intent, we believe that a more consistent national approach to energy performance standards, via Building Regulations or the Future Homes Standard, would be preferable. This would provide clarity and consistency for developers across regions and ensure a level playing field, supporting the industry's ability to deliver both sustainable and affordable housing.

Conclusion

While we commend the ambition of Policy NZ1, its application to all housing allocations is inconsistent with **paragraph 5.8.5 of Planning Policy Wales**, which directs such higher standards only to strategic sites. A more targeted and consistent approach, aligned with national policy, would ensure the delivery of sustainable homes without compromising viability or housing supply. We urge Monmouthshire County Council to reconsider the scope of Policy

NZ1 and to align it with national guidance to maximise its effectiveness while minimising unintended consequences.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S5 outlines green infrastructure measures that all development proposals 'must' incorporate. Whilst we are supportive of the policy in-principle, not all of the measures will be applicable, feasible or viable for to each development proposal which this policy would be used to assess. We would respectfully suggest that the phrasing 'will include' is substituted with 'may include subject to site-specific considerations'.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
Is your representation in support or objection?	Support:	x
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

HA12 Land west of Trem yr Ysgol

We fully support the site's allocation within the RLDP.

The emerging proposals for the site comprise:

- A range and choice of housing with circa 42 homes (with 50% affordable housing provision) including bungalows. This represents a reduction in the overall number of homes previously proposed, whilst the proportion of affordable housing has increased;
- SuDS features are now proposed throughout the site;
- A minimum 7m easement is proposed from existing watercourses;
- Opportunities for local food growing with a community orchard proposed at the site's western boundary.
- A circular walkway is proposed around the development; and
- A footpath link is proposed to provide access to the existing bus stop on Usk Road.

We have reviewed all other candidate sites submitted in and around Penperlleni and the site presents the best option for the sustainable growth of the settlement. The site provides a unique opportunity to contribute to the overall soundness of the Revised LDP – not least through delivering the following key benefits:

- Delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
- The provision of bungalows would help meet the needs of an ageing population. Delivery of such accommodation can also stimulate Penperlleni and Monmouthshire's housing market through the release of larger homes for families to occupy – the knock on effect being that this stimulates the housing chain and ultimately benefits first time buyers;
- Encouraging and supporting active travel providing links to the existing bus stop on Usk Road;
- Good quality open spaces, circular walks and community growing for the benefit of existing and proposed residents;
- Delivery of green infrastructure with biodiversity benefits (delivering a biodiversity enhancement), surface water resilience;
- Development with climate change resilience at its heart; and
- Economic benefits – including that the proposed development will generate jobs and create additional tax revenue.

We object to some of the detailed wording in the allocation and request the opportunity to attend the Examination Hearings accordingly.

HA1 Land to the east of Abergavenny

The Deposit RLDP proposes that Abergavenny East will deliver 500 homes within the plan period. Based on the revised RLDP Delivery Agreement, the RLDP will be adopted in March 2026 with there being some 7 years before the end of the plan period (of 2033) post-adoption. Whilst we await further details on the site's housing trajectory to be published, at this stage we would query whether 500 homes can realistically be delivered within the plan period. The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

- From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
- If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
- The average build out rate of sites between 500-999 dwellings is 68 homes per annum.

Abergavenny East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan-led system, the very earliest that Abergavenny East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 68 homes per annum from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 500 homes currently assumed in the Preferred Strategy.

HA2 Land to the East of Caldicot/North of Portskewett

The Preferred Strategy proposes that Caldicot East will deliver 770 homes within the plan period. The conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research outlined above in respect of Abergavenny East are relevant in respect of the plan period contribution of Caldicot East.

Caldicot East has no outline application having been submitted and is unlikely to do so until the Deposit Plan is published and the very earliest that Caldicot East could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Assuming a build out rate of 107 homes per annum (based on Lichfield's research) from the site's first completion and allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the site's contribution to housing supply within the plan period would fall significantly below the 770 homes currently assumed in the Preferred Strategy.

11.	Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

12.	Do you have any comments on the employment site allocations? (Policies EA1 & EA2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

13.	Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

14.	Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

15.	Do you have any comments on the retail and commercial centres policies?

(Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed. N/A		

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

N/A

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

In summary, the key messages outlined within these representations are that they:

- Support the Council in seeking to achieve economic growth, however we consider that:
  - the reduction in the housing requirement compared with the Summer 2021 Preferred Strategy is not justified and based on a sufficient evidence base;
  - an increased housing requirement should be pursued to align with MCC's wider growth aspirations and to harness the opportunities presented in the area;
  - an increase in the flexibility allowance (from 15% to 20%) should be considered;
  - the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement;
- Support the Council in allocating HA12 Land west of Trem yr Ysgol. It has been demonstrated that this is the best option for growth in Penperlleni as it would best contribute to the vision and objectives of the RLDP and the achievement of sustainable development; and
- Object to the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	x

	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		Fails Test 3: Will the Plan deliver (is it likely to be effective)? x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The Deposit RLDP fails Test 1 (Does the Plan fit) as an increased housing requirement should be pursued to align with MCC's wider growth aspirations.

The Deposit RLDP fails Test 3 (Will the Plan deliver) as **an increase in the flexibility allowance (from 15% to 20%) should be considered and the plan should period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement. Moreover,** the proposed level of contribution of Abergavenny East and Caldicot East to the plan period's housing supply given that it is not realistic or deliverable.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

	Yes:	x

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? N/A
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language? N/A

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

2463

Barwood Development Securities Ltd

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		
Name:	[redacted]	[redacted]
Job Title: (where relevant)	[redacted]	[redacted]
Organisation: (where relevant)	Barwood Land Securities Ltd	CarneySweeney
Address:	C/O Agent	[redacted]
Telephone No:	C/O Agent	[redacted]

Email:	C/O Agent	[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Objective 10/11

Barwood Development Securities Ltd supports the Council's objectives of achieving good design within housing schemes. We are however concerned over the use of the term 'exemplar'. We note that no other objectives require any 'exemplar' solutions, nor is there a definition contained within the Replacement Local Development Plan (RLDP) (or national policy) which further explains what this term means. This could result in subjective decisions being made. To assist applicants and decision makers, we would therefore suggest that the term 'exemplar' is either further explicitly defined or the policy refers to 'a standard of good design' only.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	X
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Support is provided to the level of growth as set out in Policy S1 which outlines that the Plan will make provision for the delivery of 6,210 homes (including a flexibility allowance of 15%) to meet a housing requirement of 5,400 homes over the plan period.

It is noted that the key objectives and policies of the RLDP seek to maximise affordable housing on new housing allocations (50% affordable housing requirement) whilst also requiring all new homes to be built to net zero carbon standards and delivering all other necessary infrastructure to ensure developments are sustainable and well connected (Section 6.3 of the RLDP refers). Whilst at paragraph 6.3.4 of the RLDP Deposit, the Council recognise these policies to be an ambitious way forward, the Council should build an element of flexibility into these policy requirements to take into account scenarios in which circumstances change in the future, Sites which can currently demonstrate deliverability could become less viable as economic circumstances/UK politics/policies change (outside of site promoters/developers control) as has been the case over recent years. Public subsidy cannot solely be relied upon. As such, flexibility parameters should be built into these ambitious policies to future proof their ability to deliver homes over the Plan period in accordance with the RLDP's Growth Strategy.

Support is also provided to the RLDPs Growth Strategy's intention to provide a balance of housing and employment growth to help reduce levels of commuting and promote self-contained communities. In particular, Strategic Housing Allocation HA3 – Land at Mounton Road fulfils these aspirations by delivering a residential led mixed use development which will deliver housing alongside commercial uses such as a hotel, care home as well as co-working spaces, thus contributing towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	X
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Support is provided to Strategic Policy S2 which seeks to distribute and focus new development in accordance with the settlement hierarchy which identifies Chepstow as a Tier 1 Primary Settlement. Chepstow is in fact ranked as the second most sustainable

settlement in in the County within the Council's Sustainable Settlement Appraisal given the role and function it serves within Monmouthshire as a whole.

Whilst it is recognised that Chepstow itself has a number of constraints to its future growth potential including: limited brownfield opportunities, River Wye, Wye Valley AONB, Mathern Conservation Area and Grade II Registered Wyelands Park & Garen, M48 and extent of Flood Zone C2, Strategic Housing Allocation HA3 – Land at Mounton Road represents a suitable and sustainable area of growth within Chepstow without conflicting with the constraints outlined above.

4.	Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

5.	Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)	
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Support is provided to the Council's intention to deliver carbon neutral developments by 2030. Barwood Land Securities Ltd recognises that the policy follows the requirements that are forthcoming from the UK Government's target of achieving net-zero carbon by 2050.

It is however considered that further thought should be given to whether the planning system is the best mechanism to facilitate any improvements in energy efficiency standards within homes and buildings or whether this should remain contained within Building Regulations. In order to ensure consistency across Local Authorities across Wales, it is suggested that Building Regulations, rather than the planning making system, is the best vehicle to deliver these goals and keep them both relevant and up to date over time. We are, therefore, objecting to this policy at this time to reserve the right to be involved in further discussions regarding this policy's wording.

7. Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PROW1)		
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We wish to highlight a mis-interpretation of PPW that has been made within the RLDP in respect of Green Infrastructure Assessments (GIA) which is a duty placed on LPAs to undertake and not a developer.

PPW introduces GIAs at 6.2.5. Here it clearly states that *"Planning authorities must, as part of adopting a strategic and proactive approach to green infrastructure, biodiversity and ecosystems resilience, produce up-to-date inventories and maps of existing green infrastructure and ecological assets and networks. Local authorities may already be undertaking such assessments and/or preparing such information to underpin local authority-wide green infrastructure strategies and where this is the case planning authorities should both contribute to this process and use the inventories and mapping to underpin a spatial approach in their development plans. Green Infrastructure Assessments provide key evidence to support the preparation of development plans and where authorities are not already actively undertaking assessments, they should be undertaken as part of development plan preparation".*

PPW paragraphs 6.2.6 to 6.2.10 continue to explain how Planning Authorities should prepare and utilise their GIAs. Nowhere in this section does it suggest that developments/developers need to provide GIAs.

At PPW paragraph 6.2.14, under the section which introduces Green Infrastructure Statements (GIS) (which definitely are the developer's responsibility), PPW does state that "*Development proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance*". Here, again, it is clear that the GIA is something to be produced by the planning authority.

In the RLDP, MCC introduce GIAs under the GI section at para 10.1.6. Here they appear to imply that development proposals need to demonstrate adherence to PPW12 and the Section 6 duty (which is itself a duty on the LPA) and to do this through a GIA. This is not correct. The GIS is the vehicle for developers to demonstrate adherence to PPW, the stepwise approach and the delivery of a net benefit for biodiversity. The GIA informs this statement but needs to have already been prepared by the LPA. Indeed, in the terms set out in PPW, the plan itself should be underpinned by the GIA, so MCC should have already prepared it (or be preparing it).

Strategic Policy S5 again references GIA and implies that this will be prepared as part of the development proposals. This should be reworded to be clearer that GIAs, prepared by the Council, will be referred to in the preparation of development proposals and GISs.

Policy GI1 (a) specifically demands a GIA be submitted with all major development applications. This is not in line with PPW and should be changed to reference a GIS only. As currently drafted, policy GI1 (and its associated supporting text) seems to effectively require a GIA and a GIS with all major applications which is not in accordance with the intention of PPW. The GI policies therefore appear confused and need to be revised and reworded to confirm with PPW.

8.	Do you have any comments on the infrastructure polices? (Policies S6, & IN1)	
Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S6 outlines that "where possible, infrastructure improvements should be provided prior to occupation". Whilst the policy appears to include a degree of flexibility, the policy wording should further clarify that in terms of larger sites, the delivery of infrastructure improvements should be subject to an agreement over the timings/triggers associated with the development. These should be secured via a S106 agreement and/or by condition at application stage. Many larger Strategic Sites which are delivered in a phased manner and will practically not be able to deliver all required infrastructure prior to occupation.

9.	Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

Is your representation in support or objection?	Support:	
	Objection:	X

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Policy S8

Section 3.11 of the development Plans Manual (Edition 3: March 2020) outlines that "an LDP should be focussed, succinct and relevant to the key issues it is seeking to address" it goes on to state that "an LDP which is repetitive and complex is likely to result in a more lengthly consultation and examination process ….**An LDP should be succinct and clear**".

Many of the RLDP policies are very repetitive and are already covered by national policy. As such, the RLDP policies should be condensed better to ensure mis-interpretation and/or confusion does not occur.

In particular, we would question the relevance of Policy S8 which appears to repeat many of the key policies contained within the plan and national policy. Key examples are set out below:

Strategic Policy S3 and S8:

- S3: 'Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings'.
- S8: 'Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings'.

Policy PM1 and S8:

- PM1: 'maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties, where applicable'.
- S8: ' Maintain reasonable levels of privacy and amenity of occupiers of neighbouring properties'

- PM1: 'respect and enhance local distinctiveness and landscape character as defined through the LANDMAP process, particularly where built and natural views, panoramas or historical features are present'.
- S8: 'Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.'.

Policy S4, NZ1 and S8:

- S8: 'Dwellings built to net zero carbon standards, including the incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points.'. S4 and NZ1 also cover these requirements.

Policy CC1 and S8:

- CC1: 'Development proposals will be expected to incorporate water management measures, including Sustainable Drainage Systems (SuDS), to reduce surface water run-off and minimise its contribution to flood risk elsewhere. The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature.'
- S8: 'The development must manage surface water through a sustainable drainage system in accordance with Welsh Government's Statutory Standards for Sustainable Drainage Systems 2018. The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature'.

Policy HA3 and S8:

- HA3: 'Creation of a high-quality well-connected extension, which responds to its edge of settlement location'.
- S8: 'Creation of a high-quality and well-connected extension to the settlement, which responds to its edge of settlement location'.

- HA3: 'Existing western and northern boundary hedgerow and woodland shall be retained, buffered and protected. Trees with TPOs and other mature trees will be retained and protected within the Community Parkland and managed appropriately to maintain biodiversity value.'
- S8: 'Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.'

- HA3: 'Provision of on and off-site highways infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment'.
- S8: 'Sites must contribute to active travel and public transport improvements as necessary.'

- HA3: 'The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions.'
- S8: 'Incorporate satisfactory air quality measures for mitigating and/or reducing emissions, as appropriate.

As a point of detail, under the sub-heading Sustainable Communities, Policy S8 outlines that: "*dwellings built to net zero carbon standards, including the*

incorporation of renewable energy generation technologies and low carbon heating systems and ULEV charging points". It is considered more appropriate if the policy wording was amended to refer to ULEV charging infrastructure rather than points. Practically, for example, it would be very difficult for flats to each have an individual charging point. Referring to infrastructure also provides flexibility (e.g. to adapt to change in technology and also choice).

Furthermore, under the sub-heading Sustainable Travel and Highways, the third criterion seeks to "*Ensure that the development does not adversely affect the safety, capacity and operation of the highway network.*" (our emphasis added). We do not believe that the threshold of 'adversely affect' accords with National Policy, either the Wales Transport Strategy 2021 or TAN18. E.g. TAN18 states "*ensuring that transport infrastructure or service improvements necessary to serve new development allow existing transport networks to continue to perform their identified functions.*" (our emphasis added). Whilst the safety element of the policy seems reasonable, in its current draft wording, any increase in delay would be counter to the 'ensure not adversely affected' threshold on capacity and operation. Conversely, the Wales Transport Strategy Delivery Plan refers to "*…not increasing road capacity, not increasing emissions through higher vehicle speeds…*". It is therefore suggested that this criterion is reviewed and revised to align better with the wording contained within National Policy.

The fourth criterion also outlines that "*streets must be designed and built to adoption standards in accordance with national and local design standards and offered for adoption pursuant to the requisite highway adoption agreements*". Whilst in principle we don't have any objections to this, it should be noted that legally the Council cannot enforce the adoption of streets and therefore this criterion is overly onerous and should be revised to retain flexibility in the delivery of streets and highway infrastructure.

Policy HA3

Full support is given to the allocation of Strategic Housing Allocation HA3 – Land at Mounton Road for a residential led mixed use development to provide approximately 146 homes and commercial uses such as Class C1 hotel and Class C2 residential care home.

The site is being promoted by Barwood Land Securities Ltd. The site has already been the subject of detailed candidate representations and in support of the promotion and future development of the land Barwood Land Securities Ltd has a full specialist consultant team appointed who have undertaken a full suite of technical investigations and assessments across the site to support the masterplanning of the site. As such, all constraints, opportunities and characteristics of the site are thoroughly understood, and illustrative masterplan has been prepared to

demonstrate how the site could be developed, with all necessary mitigation incorporated.

It is therefore considered that Land at Mounton Road, Chepstow represents an entirely appropriate location for new homes and represents a genuinely available source of new homes and commercial business opportunities, without significant constraints that can deliver housing in the short term.

Whilst the allocation itself is supported we do have detailed comments/objections to the wording of a number of the criteria included within Strategic Site Allocation Policy HA3 policy and would raise the following concerns and objections:

- Criterion c – we question whether this criterion is too specific to require a focal tree-lined avenue to the community parkland from the A466 entrance point. This is a point of detail to be agreed at the appropriate planning stage subject or other drainage / highways /GI considerations that will need to be taken into account. We have no objection to the concept of a tree lined avenue but this point of detail would need to be considered further at detailed design stage.

- Criterion m – we question the specifics of the wording used within this criterion, particularly the use of the phrase "a legal agreement" which seems unnecessary given that a "legal agreement" represents the mechanism to secure the required works. The policy should instead focus on what is necessary. Furthermore, whilst we have no specific objections to a public transport link being provided within the site we question whether this is likely to be welcomed by operators as a diversion off the main route. Instead, we would suggest that this final bullet could read "provision of any necessary financial contributions to improve public transport services and nearby infrastructure"

  As such, we would suggest that criterion m) is re-worded to state:
  - primary access junction on the A466, footways, street lighting, crossing provision and the widening and improvement of the existing footway on the A466.
  - off-site pedestrian/cycling improvements, including connections to bus stops in both directions, the National Cycle route and Chepstow's community hospital.
  - the layout in north west corner of the site will connect the proposal to the existing Public Right of Way 355/3/3 footpath.
  - land to be safeguarded for potential future improvements to the Highbeech Roundabout.
  - provision of any necessary financial contributions to improve public transport services and nearby infrastructure.

  It is also noted that paragraph 14.5.1 of the supporting text to Policy HA3 should refer to National Cycle Network (NCN4) running along both the A466 and Mounton Road.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes: X	

	No:	
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐	
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☐	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☐	
Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):		

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	X
	No:	
	Welsh:	

If you wish to speak at a hearing session which language would you wish to use?	English:	X

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

2951

Tirion Homes

Archived: 14 March 2025 16:03:51
From: [redacted]
Sent: Mon, 16 Dec 2024 08:32:13
To: MCC - PlanningPolicy
Subject: Deposit Plan Representations
Importance: High
Sensitivity: None
Attachments:
Representation Form with sheets.pdf; E24124701 - Cwm Pentref Raglan - 2024 Ecology Note_compressed.pdf;

Dear Policy Team,

On behalf of Llanarth Estate, adjoining landowners, Tirion Homes, Candleston Homes, Melin Homes and Sero Homes (together with Sero Energy and perspective commercial partners) we are please to attach our representations.

Our clients have varying interests in ensuring a robust approach to land use planning is taken. It is of utmost importance to ensure that the evidence base underlies appropriate planning interventions in order to address the problems that exist within the County and to create more sustainable and equitable communities that positively respond to the challenges that are faced.

Our clients have previously submitted proposals for a new settlement, Cwm Pentref, at the heart of the county. They have submitted significant background work demonstrating how it could be delivered and the benefits that it could bring. Our clients note the position of the Authority with regards to the level of growth proposed and that LDP's cannot allocate new settlements. Notwithstanding that, given the issues involved, they are keen to ensure that it is clear that their proposal is still a viable and deliverable option albeit for allocation in the SDP.

Our clients include land owners and farming businesses within the central areas of the County that are now more concerned than ever for the future of the rural way of life in the heartlands of Monmouthshire. They are experiencing first hand many of the challenges identified within the various evidence base documents that have been prepared for LDP review over recent years highlighting the factors impacting upon rural communities across the County. These issues include a lack of local workforce and reliance upon workers commuting in due to the unaffordability of local housing, reliance on supply chains outside of the local area, the lack of community and support services, breakdowns and inadequacies in the provision of infrastructure, the increasing cost of land management, time and expense of compliance with increased legislation, the low market prices for produce compared with cheap imports, and the need for direct sales and traceability of food (farm to table). These are all worsening as the LDP review process becomes more prolonged due to inter alia the ongoing impacts of Brexit and the combined effects of the Cost of Living Crisis, inflationary pressures and energy crisis. A continued lack of robust strategy for dealing with these matters will only worsen the sustainability of rural communities. Indeed, this would be disastrous for the County in leading towards even higher house prices, continued lack of range and choice and more restricted demographics where local people have no choice but to leave, particularly the young.

Our clients' previous representations indicate that they believe a step change is required if the County's needs are to be met and if the key challenges facing the Authority are to be addressed. In order to meet these needs and challenges, their proposals for a sustainable new settlement of the County based on zero carbon, 50% affordable housing and best practice where possible demonstrate that there remains a positive planning intervention that can be made. There is no change in the evidence base that would suggest anything other than

such an approach being required. The implications of the Deposit Plan maintaining the status quo and continuing previous trends (lack of affordability, ageing population, out commuting etc) mean that the current situation will be exacerbated and the subsequent review of the Plan will prove even more challenging.

Our clients believe that with regards to the distribution of future growth, just adding incrementally to existing settlements alone will not address the key issues faced, the lack of supply, infrastructure constraints or delivery; nor will it provide a genuine opportunity to plan for the future needs and aspirations of the County on a long term basis including new work/life practices and a shift towards healthier more active lifestyles. Similarly, a large commuter extension at Caldicott will reinforce existing patterns of growth and outmigration.

Rather, our clients remain supportive of an appropriate level of growth led by the provision of a new settlement with complimentary growth across the remainder of the Authority and still believe that it is unsound and inappropriate to remove a positive planning intervention that has the potential to deliver significant benefits. Indeed, such an approach can positively address the Well Being of Future Generations Act and create a vibrant and active community with a wide range of land uses and activities – supporting the surrounding rural area as well as stimulating and encouraging growth. Our view is only strengthened by the impacts of Covid 19 and the move towards sustainable living in local communities and working from home.

As we have stated previously, our clients do not believe that the Authority should simply accept growth at any cost. Indeed, our clients believe that a new settlement in the right location would provide an appropriate long term opportunity to move away from existing problems, constraints and issues. It could provide a step change in the approach to the future well being of the County over the current, and future, plan period. It can also provide a Europe leading approach to best practice in the delivery of communities and places. A new settlement planned with sustainability at its heart provides an opportunity to respond to the unique circumstances in Monmouthshire to set an agenda for a new, modern and sustainable way of living appropriate to its location whilst benefitting surrounding settlements. As demonstrated in our clients' supporting evidence, this sets out the aspiration to provide 50% affordable housing, allowing new residents to fill local jobs in the agricultural, care, catering and tourism industries and a major leap towards net carbon zero – it can provide the step change that the County requires which would lead the development industry nationally.

We note that adopting a lower growth scenario favoured by the Welsh Government means that the key issues can't be addressed and it will be inevitable that a new settlement (or equivalent step change) will need to be considered in a future Strategic Development Plan (SDP) in order to address the problems identified and exacerbated. Indeed, we believe that it should be eminently feasible for an LDP to "dovetail" with an SDP, and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process.

We recognise that the Local Authority is constrained with regard to the ability to allocate a new sustainable community, however, our clients would like to emphasise the fact that their proposal remains a viable option for the SDP in due course. I note that more recent ecological work has been undertaken on the site and I also attach this for your records.

Our answers to the questions posed in the consultation are set out within the attached and our response is based on a provision of options that will respond to the updated LDP objectives, the Welsh Government's placemaking objectives and Well Being goals.

Our clients are more than happy to meet with the team as in due course if you would like to discuss any aspects of the proposal.

Kind regards

[redacted]



[redacted]

T: 02920 349737 **M:** 07788 277150
www.lrmplanning.com

22 Cathedral Road, Cardiff, CF11 9LJ

REGISTERED ADDRESS: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ
DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Llanarth Estates, Melin Homes, Tirion Homes, Candleston and Sero	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not carried through to the deposit version of the Plan and are not available for the Authority to make.

1.2 Our clients consider that the overarching aims of the Plan are unobjectionable and in line with the evidence and Planning Policy Wales. Our clients' fundamental concerns however, relate to the level of disconnect between the evidence base, the issues faced and the artificially constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the tests of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 A failure to provide sufficient housing to meet the current and future needs in terms of scale and affordability will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. Monmouthshire is already one of the most unaffordable places for people to live and it has a higher proportion of outright owned larger family homes than in surrounding authority areas. Levels of need for elderly care and support are increasing and there is a lack of locally available care provision available to meet increasing need. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.4 We also raise concerns over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan alternatively the period for this plan should be extended to 2038 with additional allocations identified.

KEY ISSUES AND CHALLENGES

1.5 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP depending upon lead in times for development and viability.

1.6 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) supported a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.7 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenarios upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.8 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. For instance, the evidence base for Future Wales recognises that the broad housing figures that are suggested therein are based on past building rates which themselves are constrained due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.9 We also note that there are significant challenges facing rural businesses and communities including in respect of agriculture, forestry, tourism and care. These sectors have been particularly hard hit by trends that are impacting upon the supply of workers. Indeed, our clients are strongly of the view that greater consideration must be given to the rural economy and workforce generally and specifically the lack of affordable accommodation for those workers and a range and choice of housing for residents wishing to downsize within or close to their local communities, so they do not need to be displaced from the support structure they require. For instance, there is significant concern that many farms and/or agricultural units are becoming unviable and there is little being actively done to discourage them from diversifying or being lost;

1.10 Without a positive approach towards the future of the Authority it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts at the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of further comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";

- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted;
- our clients are of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.
- our clients believe that the Vision should include reference to the agricultural core of the County. Given uncertainties surrounding the future of farming and other rural activities (eg quarrying, forestry), lack of affordability and availability of a local workforce, there is a very realistic prospect that agriculture could be substantively gone in the Authority by 2033. Our clients own over 30 farm holdings and over 1500 ha of agricultural land in the centre of the County, each year it is more difficult to sustain such holdings when there is a lack of affordable homes for rural workers at the heart of the Authority. Commuter estates at Caldicot will not provide sustainable local housing to support businesses and residents in the rural heartland where they need it; much of rural Monmouthshire's landscape and character relies heavily on the stewardship of agricultural holdings, and the maintenance of this is time consuming and expensive with the need to pass on skills to future generations together with a wider understanding of the processes and farming methods involved in long term stewardship, protection, and enhancement of some of the County's most attractive attributes. Partnering with a not for profit society will bring forward housing to rent at below market rents ensuring key workers can access suitable accommodation locally; and
- Our clients welcome the inclusion of reference to a zero carbon County in line with Monmouthshire's declaration of a climate emergency and commitment to do all it can to help address the emergency.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives and comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasicity of supply in the housing market means that affordability

	demography and socially and economically sustainable communities.	will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places.
13	**Rural Communities** To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	Our clients are strongly of the view that a distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Indeed, it is often the smaller more remote settlements where property supply is limited and prices are highest and our clients consider that proportional growth is therefore appropriate in these locations provided appropriate infrastructure and community facilities exist to ensure the settlement is truly sustainable. However, this should not be at the expense of proposals that seek to address the much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural "way of life" ought to be the objective, as opposed to provision of large estates along the M4 corridor. Furthermore the particular difficulties faced as a result of Brexit and the lack of trade deals means that being self-sufficient and able to produce our own food is of primary importance. This is also of global importance by reducing the number of food miles some goods travel to reach market.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our clients are significantly concerned by the approach taken towards restricting growth in the Local Authority which itself has fallen by up to 30% since the 2021 Preferred Strategy Consultation and does not reflect the evidence.

1.2 Our clients are concerned that the approach taken has been entirely shaped by the Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Indeed, since we submitted previous representations on the higher growth strategy sought, the wider socio-economic circumstances have changed considerably with inflation, increases in the cost of living, energy prices etc. Adding these to the impacts of Brexit and Covid 19, our clients remain of the view that there must be a duty on every LDP to promote, encourage and foster the highest possible ambitions for achieving sustainable growth. In this regard we still believe that the approach taken to rule out a new settlement does not reflect long term planning aspirations or the specific circumstances of the County.

1.3 We are concerned that there is a significant conflict with Future Wales in the case of Monmouthshire, where the Welsh Government's position blocks a Plan-led intervention that can positively address the issues identified and hinder sustainable placemaking. The challenges facing Monmouthshire are very well acknowledged across existing policy, strategy and research documentation including the research that has shaped the previous iterations of the replacement LDP and the consideration of growth options. Indeed, it is well known that the housing market reinforces these issues and without positive interventions (i.e increasing the supply of new homes of appropriate size and tenure), there will be further worsening of matters such as the sustainability of services, the ageing population, high levels of in- and out- commuting (general lack of sustainability) and affordability. These issues have both economic and housing market implications as well as in respect of society and inequalities putting pressure on social care particularly for the isolated elderly.

1.4 Indeed, it is stated at para 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.5 These requirements shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.6 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4.

1.7 For Option 3 (4770 homes over the plan period plus a 15% flexibility allowance so 5485 in total), the evidence base indicated that this level of growth would result in inter alia:

- ***"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.8 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts would still exist:

- ***'Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.***
- ***Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."***

1.9 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- "***This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.***
- ***Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.10 It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- ***"Growth Option 1 is identified as best performing against ISA (integrated Sustainability Assessment) themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."***

SOCIO ECONOMIC CONTEXT

1.11 Hardisty Jones Associates (HJA) are widely experienced economists specialising in development needs and impacts. They were commissioned by our clients to consider the socio-economic context for Monmouthshire, specifically considering the central parts of the Authority which form the rural core. The results of their research reinforce the point that lower growth levels as envisaged would exacerbate the already significant problems experienced in the County and its rural communities and key workers.

Demographics / Age Profile

1.12 HJA note that the age profile of the central rural part of the Authority is largely an exaggerated version of that witnessed throughout Monmouthshire. It can be summarised as aged and ageing, including:

- An older population i.e. a high proportion of residents aged 65+ years, and a high proportion aged 50+ years, with shares in these age groups having increased over the last 10 years;
- A high proportion of retired residents and low proportion of households with dependent children; and
- A decrease in resident population under 50 years since 2010.

1.13 The Growth and Spatial Options Assessment previously undertaken confirms that the level of growth sought will not address these issues compared to the previous level of growth suggests it will. A higher level of growth is required in order to make a step change in this profile.

Housing Stock

1.14 The housing stock in the rural heartlands of the County is characterised by a greater proportion of larger properties. There is relatively low diversity of stock in terms of size, typology and tenure. This provides very limited choice in the market.

1.15 The share of households that own their property or privately rent is much higher than benchmark locations, and the share of homeowners that own their property outright with no mortgage is also much higher. The tenure profile exhibits a much lower share of households in social or private rented accommodation, and a very low proportion falls within affordable tenures.

1.16 A limited growth strategy will exacerbate this trend.

Affordability

1.17 Median house prices in the central part of the County are higher than other benchmark locations. This is at least partly driven by the size profile of the dwelling stock. Lower quartile house prices across the dwelling stock have consistently remained above the Monmouthshire equivalent. Average household incomes are low compared to many parts of Monmouthshire.

1.18 Housing affordability is significantly worse in Monmouthshire than Wales overall. The higher house prices and lower incomes data would suggest the local position in the heart of the County is worse than the district wide average. The housing mix is a contributor to this problem with such a high proportion of large detached and semi-detached properties and relatively few smaller properties and affordable tenures.

1.19 Housing affordability is without doubt a significant issue in Monmouthshire that must form a central component of any strategy. Accessing housing in rural areas is a challenge that extends beyond Monmouthshire, however, the County is the least affordable of all rural areas in Wales. The Local Housing Market Assessment has identified huge affordable housing need, way beyond what is deemed 'reasonable' to deliver via the Revised Local Development Plan.

1.20 Alongside the fact that policy would be unable to tackle the full extent of the challenge, sits the delivery challenge. Levels of development of both market and affordable housing over the current LDP period have fallen below targets (for a range of reasons including viability and technical constraints). In part this contributes to current need. In order to deliver the identified housing requirement and achieve ambitions around addressing the ageing demographic profile and reducing commuting levels, there is a need for an alternative level of growth which is higher than previously assessed.

Economy

1.21 Economic activity rates are generally high and would be very high if not for a substantial proportion of early retirees in the area. However, the area has experienced relatively weak employment growth, with declines in the local area prior to the Covid 19 pandemic. This is set against rising employment across wider benchmark locations and the current cost of living crisis and economic recession in the UK.

1.22 A restricted growth scenario (that retains the overall imbalanced age profile) is not going to address the fundamental problems.

1.23 From an economic perspective there is ambition to see a thriving and diverse economy. This will need to build on both inward investment and innovative, competitive indigenous businesses. This will certainly need to include developing existing rural based strengths and key sectors including tourism and leisure, food and drink and agri-tech as well as manufacturing, technology and digital activities. Farm practices will need to be future proofed to ensure they survive and the County continues its role as an important source of local produce. It needs to ensure the agricultural base is supported with key workers based locally and trained, with agriculture being recognised as an important industry essential to the health and wellbeing of local people. This is an approach advocated by the Welsh Government in their “Food for Wales, Food From Wales” document on local food production. None of these challenges can be met absent a robust and sustainable approach to planning interventions.

Commuting

1.24 There are large commuting flows both in and out of the County and the local area. Generally, essential workers (including key workers) commute into the Authority to take on important roles with more affluent workers commuting out of the Authority to urban centres such as Bristol, Cardiff and Newport. These levels have stayed broadly constant, or possibly increased, over the last 10 years despite policy ambitions to reduce these flows. The removal of tolls on the Severn crossings increased these figures as commuting costs have reduced.

1.25 These are clearly not the characteristics of a sustainable and equal place and addressing these challenges must be a key requirement of any Plan if the Council's obligations under the Well Being of Future Generations Act are to be met. Adopting a level of growth as is being suggested by Future Wales is in clear conflict with the evidence base which can only worsen this situation.

1.26 It is fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own entirely different but equally challenging issues that need to be addressed. It isn't possible to consider the whole of SE Wales as one when focusing on deprivation in previously industrial areas will not maintain the food producing heartland of the east of the region.

MEETING NEEDS

1.27 PPW12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.28 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County.
- Artificially low growth would impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. The pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable. Difficulties in sustaining services and facilities across the County will result in rural isolation.
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation.
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients strongly object to the current approach towards Spatial Strategy which does not adequately address the key challenges faced by rural communities.

1.3 We remain surprised and disappointed that perhaps the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. As we have previously commented, such an approach provides the step change required in the County. Notwithstanding this, with regards to the other potential components we note Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

Existing Infrastructure and Constraints

1.4 Many existing settlements (in all tiers and including the Strategic Sites) are subject to numerous constraints (including land assembly, landscape and nature designations such as AONB, SSSI, SAC etc) third party constraints, transport, facilities / services, foul and surface water drainage, phosphates, air quality etc.). It will therefore be vital to ensure that an adequate ownership and infrastructure plan is prepared to ensure that existing constraints are overcome with suitable levels of investment.

Distribution

1.5 Given the significant issues facing the central and northern parts of the Authority, our clients are concerned that 44% of growth is to be directed towards the M4 corridor / Severnside settlements which accommodate around 20% of the population, rather than spreading more evenly across the County in line with the other 80% of the population. This will not enable local needs to be met fully and will not address the key challenges in terms of demographics and affordability. Indeed allocating just 14% of growth to the significant number of Tier 2 and 4 settlements reinforces the existing trend of larger properties that are unaffordable for local people and key workers.

1.6 Similarly, whilst clusters have been identified for Severnside, Chepstow and Abergavenny, the strategy does not recognise the fact that there are a large number of other communities in the northern part of the County that are based around a hierarchy of hub and clusters with service centres serving a wide rural hinterland, around which sustainable patterns of movement and growth occur.

1.7 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key

issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

Sustainable development

1.8 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.9 Indeed, Creating and Sustaining communities is one of the Key Planning Principles listed in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.10 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."***

1.11 There are of course many other examples of relevant policy and Welsh Legislation requiring a sustainable approach towards development and meeting needs which we do not repeat here in the interests of brevity. However, it is clear that not addressing problems which will achieve sustainable development by balancing needs and addressing inequalities is contrary to the overarching objectives of the planning system.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.12 We are strongly of the view that a new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority.

1.13 It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

SOURCES OF SUPPLY (TABLE 2)

1.14 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as: following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply requirements are not realistic and appropriate having considered the evidence; and

- restricting the level of housing (location, range, choice and number) available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.15 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (ie between 2018/19) and 2023/24), existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principle source of sites to contribute towards the RLDP.

1.16 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward than for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.17 Such historic under delivery will have had a significant adverse effect on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.18 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.19 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.20 Given the above, we believe that 230 is highly optimist and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.21 We welcome the approach taken towards the trajectory by the Council in general. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particularly against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.22 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth.

Caldicot

1.23 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application followed by a tender and sales process further delaying delivery.
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- As noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year , such that RM's for early phases are not in a position to be submitted until 2029 and pre-commencement conditions discharged thereafter; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.24 Given the above, we note that at least **320 dwellings** that are in the current plan period will be delivered in the next period.

Abergavenny

1.25 We note the comments in the Background Paper, however, not withstanding that we submit that:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, (absent a timeframe for submission of an application), it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would not be submitted until early 2029 and pre-commencement conditions discharged subsequently; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.26 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

FLEXIBILITY ALLOWANCE

1.27 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward, the previous LDP having under delivered by 33% and as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.28 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.29 We have already set out our concerns regarding the level of growth in representations in respect of this which consider that the approach to growth should be more positive. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.30 It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 6. Do you have any comments on the climate change and renewable energy policies?

STRATEGIC POLICY S4 – CLIMATE CHANGE

1.1 Our clients support the overarching aims of the policy however, we believe that this ought to be applied to new allocations within the Plan on a site by site basis. Our clients believe that each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.

POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

1.2 Our clients are supportive of the approach taken. It is noted that their proposals for a new settlement demonstrate what is achievable, in particular a truly zero carbon community that uses the latest technology to generate and store the energy it needs as well as turn local waste into power and centralised recycling facilities and a pyrolytic plant to turn waste products into energy, reducing the net waste produced. This is possible due to the scale of the proposal and the unconstrained and significant land ownership.

1.3 They propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity at localised energy centres to power local transport, community facilities, homes and businesses. Surplus power will be exported to the national grid.

1.4 Phosphate free fertiliser as a bi product of the anaerobic digestor will be available for local farms to protect biodiversity. On plot micro power generation, such as ground and air source, solar and photovoltaic technology will be incorporated as a standard building design element alongside fast charging points, energy storage and high-performance thermal envelope.

POLICY CC1 – SUSTAINABLE DRAINAGE SYSTEMS

1.5 Our clients are supportive of the policy. It is noted that their proposed new settlement provides a nature-based solution which will secure a net biodiversity gain. Benefits will be seen at all scales from window boxes and planters, individual gardens, community allotments and orchards, to interconnecting green corridors, site wide planting and SUDs networks.

1.6 Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, linking into 125ha of new habitat within green space. New habitats will include meadow creation, wetland, woodland, hedge planting and specimen trees incorporating native plant species.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?

STRATEGIC POLICY S5 – GREEN INFRASTRUCTURE, LANDSCAPE AND NATURE RECOVERY & POLICY GI1 – GREEN INFRASTRUCTURE

1.1 Our clients are supportive of the approach taken by S5 and GI1. Their proposals for a new settlement demonstrate how green infrastructure, landscape and nature can thrive with innovative solutions, indeed, they propose creating over 125ha of new habitat and green spaces from intensively farmed land. Their approach taken seeks to ensure that their proposed community delivers an open, accessible and engaging environment. Interlinked open spaces will bind each neighbourhood together, increasing opportunities for recreation, helping and strengthen wildlife corridors and allowing people to move freely. Parkland will create a visitor destination in its own right and an important education resource.

1.2 Their proposed landscape strategy is based on six key components:

- The connection of two central but fragmented pieces of woodland. This ecological and recreational resource will be supplemented by a significant new native woodland;
- The creation of a new green spine running north-south through the residential areas, serving as an arterial route, transporting people via public bridleways, footpaths and cycleways through a mosaic of ecologically diverse habitats and connecting two fragmented stream catchments;
- The provision of two new public parks, offering individual amenity experiences at (i) Hilltop Park, with glamping and tourism and (ii) Wetland Park, based on the existing damp grassland area to the south-west;
- Four distinct neighbourhoods, based around community facilities, including communal growing spaces and play areas. These will be connected to a walkable village centre with footpaths and greenways based around existing hedges and field boundaries;
- The creation of a dedicated sports hub; and
- The creation of a patchwork of meadow and woodland, providing amenity-rich landscape, a highly sustainable and healthy wildlife resource and a dynamic rural-to urban interface where the urban environment blends seamlessly with open countryside.

1.3 In addition, and of significance their proposal is based around providing a positive contribution towards dealing with phosphates, and a mitigation strategy that ensures phosphate neutrality for the proposals but will also free up enough “credit” in order to facilitate a minimum of an additional 1,770 dwellings elsewhere in the north of the Authority, if desired. This can be increased to up to 6,000 dwellings through various measures.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY S7 AFFORDABLE HOUSING

1.1 Our clients are supportive of the aspiration to provide 50% affordable housing on allocations. In order to meet the known demographic needs of their local area, they have demonstrated on their proposals for a new community that fifty percent (50%) of housing can be affordable, including specific provision for key workers. In addition participating development partners will deliver below market rental properties. This will be a whole life community for all focused on the needs of residents including providing high quality assisted living units and care accommodation.

1.2 We have previously submitted detailed information with regards to the innovative approach our clients are taking in working with delivery partners, Tirion, Melin and Candleston in order to lead on a model for delivery. The development partners have proven track records of delivering a wide range of quality homes catering for all sectors of society. For ease I set out a summary here which helps to support the policy and demonstrate what is achievable.

Tirion Homes

1.3 Tirion is an independent not-for-profit Community Benefit Society delivering large scale mixed-tenure housing regeneration with a focus on affordable homes. They add value through innovative finance, design excellence and collaboration. They are currently delivering a portfolio of over 1500 units on regeneration sites in Cardiff, Newport and Tonyrefail. Tirion has developed an innovative long-term finance model with M&G Investments facilitating the delivery of over 50% affordable housing on their sites without any Social Housing Grant. The Tirion Model is particularly suited to large scale collaborative projects where the delivery of affordable homes improves rather than hinders viability through highly efficient finance.

1.4 At Ely Mill Tirion has also facilitated the development of a cluster of start up businesses “The Boneyard” which includes a café with pizza oven, therapy facilities, food producers, jewellery makers and crafters, a pottery workshop, furniture upcyclers and a plant emporium.

Melin Homes

1.5 Melin Homes seeks to be a dynamic organisation that works with others to make a positive difference to the people and communities they work with. They provide quality homes and services in Blaenau Gwent, Monmouthshire, Newport, Powys and Torfaen. As a registered social landlord, they work closely with local authorities and other partners to build thriving communities. Their mission is to make a positive impact on neighbourhoods by providing high-quality social housing to those who need it and pride themselves on providing an excellent service to customers.

1.6 Melin has over 4,500 units of accommodation and is on site with a large number of new homes for residents over many different locations. These houses form part of their commitment to develop 1,000 houses over 5 years. They seek to be an independent, ethical and sustainable business that delivers growth within their operating area. Their approach to growth is consistent with the business

approach to thinking longer term and being mindful of the five ways of working set out in the Well-being of Future Generations Act and the seven well-being goals set out in the Act.

1.7 Melin also hosts Y Prentis, a shared apprenticeship scheme which is jointly owned with Monmouthshire Council which was established to meet the increasing demands of socially procured goods, services and works associated with the construction industry in south-east Wales. Since its inception in 2012, Y Prentis has made a real difference in helping to train more than 300 apprentices, supporting more than 120 partners and helping to deliver in excess of 650 qualifications, making a real life positive contribution to the region.

1.8 As an organisation they continue to look forward, to meeting the challenges faced with enthusiasm, determination and imagination, and to reporting on their continuing journey to providing the highest quality homes and services to the people and communities they serve.

Candleston Homes

1.9 Candleston Limited is a wholly owned subsidiary company of Melin Homes and operates in South East Wales. It has been established to develop a reputation as a leading house builder of high-quality sustainable homes, whilst making long-term investment into communities and generating returns for Melin to further its charitable objectives.

1.10 They have delivered a number of new homes across Monmouthshire. The team are working hard on establishing a pipeline of opportunities in strategic locations and have become an essential part of the Melin Homes Group delivering new homes and augmenting the affordable homes provision across the region in which Melin operates.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 13. Do you have any comments on the visitor economy policies?

STRATEGIC POLICY S12 – VISITOR ECONOMY

1.1 Our clients note the significant role that the visitor economy plays in Monmouthshire and in particular its importance to the tourism economy. In addition to supporting local business, there is a need to contribute to the broader needs of the local and national economy. Tourism is of significant value to Monmouthshire, with 2017 statistics showing an influx of 2.24m visitors to Monmouthshire, which provided a £219m boost to the economy with 2,989 jobs supported by the sector. (Visit Monmouthshire, www.visitmonmouthshire.com/ tourism-business-support.aspx), Tourism Performance (2017). Cycling alone is a major contributor to the Welsh tourist industry. Visit Monmouthshire explains that "According to the 2015 Great Britain Tourism Survey, cycling is worth £90 million to the Welsh economy through daily visits and stays. Around 300,000 overnight visits to Wales each year involve cycling and/or mountain biking with an annual worth between £55 and £60 million." (Ibid)

1.2 Within their proposed new community, there are opportunities to connect areas of cultural heritage, education, camping and sports facilities to provide a healthy environment for both residents and visitors alike. There is huge potential, therefore, to take advantage of this burgeoning industry, develop existing facilities and make an even greater contribution through additional connectivity. There are also proposals for an equestrian centre which will be combined with substantial investment in public bridleways to provide a well-integrated set of facilities for horsemanship and exercise.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 14. Do you have any comments on the sustainable transport policies?

STRATEGIC POLICY S13 – SUSTAINABLE TRANSPORT

1.1 Our clients are supportive of the approach taken towards sustainable transport. It is noted that the policy includes reference to enabling solutions to rural transport issues. Our clients are well aware of the problems faced by rural communities and would like to draw the Council's attention to the benefits that an unconstrained new sustainable settlement could bring.

1.2 Indeed, in their proposals active travel, health and wellbeing, and mobility for all will be the key guiding principles in developing travel plans and sustainable travel choices for their new settlement. It includes a number of innovative solutions towards rural accessibility issues. Cwm Pentref will cater for all the needs of its residents so that they do not need to make distant journeys for basic needs and services.

1.3 It will establish a sustainable transport hierarchy that prioritises public transport, riding, walking and cycling over the use of the car with most facilities within walking distance. As a consequence the following measures are proposed:

Electric shuttle bus & Transport hub

1.4 Located just off the A40 a transport hub is proposed to connect residents, businesses and tourists to the surrounding major cities, towns and villages. An electric bus service operating from the hub would circulate within the site and provide internal connections to local train stations, local centres, school etc. In connection with a number of proposed car-free zones, this service would help ensure that all parts of the development can be easily accessed without having to revert to car travel. The hub would also provide cycle parking and connections onto a site wide footpath and cycle network.

1.5 Bus services operating from the hub would circulate within the site and allow onward bus connections to be made from the hub to Abergavenny, Raglan, Monmouth and Newport. The bus service to Abergavenny would be synchronised with the rail timetable and connect to the King Henry VIII secondary school.

Self contained and sustainable internal movements

1.6 It is proposed that within the development specific areas will be car free and the surrounding neighbourhoods will be within easy walking or cycling distance along a network of cycle and walking routes which have been planned to link all areas within the scheme and local points of interest (Raglan Castle and village, garden centres and local pus and restaurants as well as the nearby gliding centre).

1.7 An interconnected network of over 18km of footpaths and cycleways will provide a safe, off road, choice of routes through the development including safe walks to schools.

1.8 High quality bike storage will be located at strategic points such as the transport hub and local centres to encourage residents to use sustainable transport methods. Routes have been linked to the existing Public Rights of Way (PRoW) crossing the site to allow wider access to the network including National Cycle Routes and an existing National Trail. Footpath and cycle connections between the site and Raglan to the south east will be assessed and improvements explored. Furthermore opportunities will be explored in consultation with Sustrans to extend the network.

1.9 All dwellings will have their own covered cycle storage and sufficient cycle storage will be located at areas of general assembly (local centres, schools etc) and at all the nondomestic buildings.

1.10 The car free areas will be supported by nearby parking generally within 50m of a dwelling. The theme will be walkable neighbourhoods with facilities within 800m. Bus services within the development will be within 300m (max 400m).

EV priority

1.11 Electric Vehicle (EV) charging points will be provided to a substantial number of car parking spaces. These charging points could be connected to PV panels, battery storage and/ or other forms of renewable energy generated across the site (such as the CHP plant in the energy centre).

1.12 For on plot parking private carports will be preferred over garages and the carport roofs can be used for PV (Flexi-solar or similar).

1.13 Over and above walking and cycling, electric car charging and public transport, it is envisaged that a Car Club would be set up with spaces provided at convenient pick up locations throughout the development. In addition, on site infrastructure would be designed to enable future use by connected autonomous vehicles (CAVs).

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 16. Do you have any comments on the community infrastructure and open space polices?

STRATEGIC POLICY S15 – COMMUNITY AND RECREATION FACILITIES

1.1 We are supportive of the approach towards community facilities and recreation,

1.2 Our clients proposal for a new community demonstrate how master planning can deliver sustainable places based around community facilities. Central to their proposal for instance, localised neighbourhood centres will provide access to a wide variety of facilities including shops, business support, schools, health and social care facilities. These centres will be car free places linked to the bus and cycle network. Outdoor market spaces, and communal open areas will encourage farm enterprise and community cohesion.

1.3 Onsite energy centres will distribute locally generated power to the neighbourhood. They will incorporate site management offices and space for the emergency services. Additionally a repair workshop and upcycling centre with tool and equipment hire will be available alongside digital hubs to manage fibre to home connectivity and conferencing infrastructure providing technology support for home working.

1.4 The proposals also seek to create a network of Community Hubs, focused on local energy centres linked by the site's electric bus route and cycle network. These hubs will provide flexible co-working spaces, community rooms for meetings, training, events and classes (such as yoga, brownies, antenatal classes), recycling centres, postal distribution and collection centres, cafes, and space for faith groups to meet. Attached to each hub, a group of almshouses for the elderly and a children's day nursery seek to ensure that different generations can integrate and support one another.

POLICY CI2 – PROVISION OF FORMAL AND INFORMAL OPEN SPACE AND ALLOTMENTS / COMMUNITY GROWING AREAS

1.5 Our clients are supportive of measures that aid the local production of food. Indeed, this is an important component of their approach to their proposed new settlement, which seeks to champion local growers and producers both on and off site. From locally reared meat and dairy, to baked goods and honey, and fruit and vegetables. Their proposals will provide the infrastructure necessary to deliver fresh goods from local farm to the table, (as well as a phosphate free fertiliser as a bi product of the energy centre).

1.6 A new community farm with market garden is proposed, supplying veg boxes to low income residents. Allotments and community gardens, orchards and a 'food forest' will be woven through the development. The neighbourhood centres will cater for regular farmers markets and pop ups.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 17. Do you have any comments on the mineral and waste policies?

STRATEGIC POLICY S17 – SUSTAINABLE WASTE MANAGEMENT

1.1 Our clients are of the view that sustainable waste management ought to be promoted and they are supportive of the requirements. However, it ought to be noted that waste is not limited to commercial and household waste, some of which is not currently suitable for standard recycling processes. Rather there is a significant amount of agricultural waste across the Authority. There should be innovative means of dealing with this, for instance our clients proposed Anaerobic Digestion plant will take farm waste from across their landholding and the wider County to generate gas. The bi product will provide a phosphate and nitrate free fertiliser that can be used on local farms and has the potential to remove a major source of pollution (phosphates) from the local eco system and river catchments.

1.2 In addition, our clients proposed waste to energy gasification plant, which will use predominantly waste plastics (that cannot be recycled) along with some biomass to convert waste into a bio-gas. Such a facility could be located within the employment area alongside and indiscernible from other small factory type units with limited impact. In the case of our clients' proposal, the gasification plants would be converted at localised energy centres into heat and power. The heat will feed into a District Heating System in the village centre to support community facilities and higher density accommodation for the elderly and vulnerable whilst surplus can be converted to electricity to feed into the grid or directly to nearby homes.

1.3 Such a sustainable, net carbon zero approach to energy needs (including in respect of charging points for cars, bikes and shuttle buses) provides a unique opportunity for the County.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		x
Fails Test 3: Will the Plan deliver (is it likely to be effective)?		x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

Question 3 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE



SEPTEMBER 2024

soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone: - 033 00 13 00 12
e-mail: - enquiry@soltysbrewster.co.uk
Web Site: - www.soltysbrewster.com

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE

DOCUMENT REF: E24124701/Doc 07 – September 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	17th Sept. 2024	[redacted]		

ECOLOGY SUMMARY NOTE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

Background

Soltys Brewster Ecology (SBE) were commissioned by Llanarth Estate to undertake an ecological walkover survey of an area of land at Raglan, Monmouthshire (central grid reference: SO404092, see Site Location Plan in Appendix I). The area, which encompasses agricultural farmland with associated hedgerow, treeline and woodland boundaries, has been proposed as a strategic candidate site for residential development as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP) review process. An initial baseline survey was completed at the site by SBE in 2019[1], with an updated Preliminary Ecological Appraisal undertaken again by SBE in 2021[2], following changes to the site's redline boundaries. The results of these surveys are now considered 'out of date' and so in order to establish if there had been any notable changes to site conditions (i.e. type and distribution of habitats), an updated walkover survey was undertaken in August 2024 to inform the current promotion.

2021 Survey Work

The 2021 survey visit (SBE) revealed limited range of habitats at the candidate site, in line with its agricultural use, with conditions largely consistent with the findings of the 2019 survey (see 2021 Extended Phase 1 Habitat Plan in Appendix II). The majority of the site consisted of arable and improved grassland fields which were considered of low ecological importance. Other habitats present included poor semi-improved grassland, plantation woodland, scattered trees and scrub, continuous bracken, hedgerows, ponds, swamp, ditches and buildings – of which hedgerows, ponds and swamp were all identified as Section 7 Priority Habitat under the Environment (Wales) Act 2016.

The habitats present at and directly adjacent to the site were considered likely to support locally foraging/commuting bat species, nesting birds (including ground-nesting birds), Badger *Meles meles* and amphibians, potentially including Great Crested Newt *Triturus cristatus*. The habitats also had limited potential to support Hazel Dormouse *Muscardinus avellanarius* and common reptiles, while the survey identified several trees and buildings at the site with potential to support roosting bats. No invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded at the site.

[1] Soltys Brewster Ecology (SBE) (2019). *Land at Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885901/DOC 02 – 30 July 2019.

[2] Soltys Brewster Ecology (SBE) (2021). *Cwm Pentref, Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885902/DOC 01 – 24 August 2021.

A desk study completed as part of the 2021 Preliminary Ecological Appraisal confirmed that the candidate site does not lie within or adjacent to any internationally or nationally designated sites for nature conservation, and neither can any such site be found within a 1.5km radius. Several locally designated Sites of Importance for Nature Conservation (SINCs) were identified in the local area, none of which would be impacted by the proposal based on their physical separation from the site (the nearest SINC was found approximately 400m to the northwest). The data search did reveal that the candidate site contains one parcel of Ancient Semi-natural Woodland (ASNW) and three parcels of Plantation of an Ancient Woodland Site (PAWS), associated with Chapel Wood and Pentwyn Wood. A copy of the 2021 desk study information received from South East Wales Biodiversity Records Centre (SEWBReC) is included within Appendix III.

2024 Walkover Survey

The updated site walkover survey was undertaken on the 15th of August 2024 by a suitably qualified ecologist[3]. Overall, conditions across the candidate site have remained broadly consistent with what was mapped/recorded in 2021, and as such the 2021 Phase 1 Habitat Map (see Appendix II) is still considered to be representative of the site. Site notes taken during the 2024 walkover survey, along with accompanying photos and an annotated map, are included within Appendix IV.

Habitats

The majority of the candidate site remains occupied by a series of arable or improved grassland (mostly Ryegrass leys grown for hay/silage with some sheep pastures in the west) field parcels which were considered to hold limited ecological value and continue to represent the most suited areas for any future development. Other habitats recorded at and immediately adjacent to the site include parcels of plantation woodland, scattered trees and scrub, hedgerows, ponds, swamp, ditches and buildings – all of which are as described in 2021. These habitats, which are mostly associated with the field boundaries/margins, were considered to represent more important ecological features (in context of the site), with hedgerows, ponds and swamp all still listed as S7 Priority Habitats in Wales. The only notable changes since the 2021 survey visit related to some minor changes in land-use practices/management within several of the agricultural fields – these changes are set out in Table 1 below.

[3] Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of habitat and protected species surveys and previous knowledge of the candidate site.

Table 1 – Changes to land use/management in field parcels

Field No.	Changes to habitat/use
F6	Previously Arable – now sown with improved grassland.
F7	Previously poor semi-improved grassland – appears to have recently been sown with improved grassland (Ryegrass ley grown for hay/silage).
F11	Previously unmanaged/dis-used land parcel covered entirely in continuous Bracken – The field is still unmanaged with the Bracken now being replaced by successional scrub comprising Bramble with young strands of Willow *Salix sp*. and Birch *Betula sp*.
F16	Previously improved grassland – now used as Arable.
F19	Previously improved grassland – now used as Arable.

The various buildings found at across the site (i.e. those associated with Wern-Y-Cwrt Farm in the west, or the barn found in the far east) also remain in similar appearance to what was recorded in 2021, with no notable changes to their current use or condition – see Target Notes 1 & 6 in Appendix IV.

No invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were found at the site during the walkover survey. However, Cherry Laurel was noted within one of the woodland parcels in the northern extent of the site (see Target Note 12). While this species is currently not listed on Schedule 9, it is considered particularly invasive and can spread rapidly in woodland environments if left unmanaged.

Protected Species

As the type and extent of habitats across the site have remained consistent with what was recorded during the 2021 survey visit, so does the site's potential to support protected or priority listed species (as discussed in paragraphs 3.37 – 3.50 of the 2021 PEA report). The parcels of woodland, hedgerows and treelines continue to represent good quality habitat for a range of tree/shrub nesting birds and foraging/commuting bats, with the open fields likely support ground-nesting bird species such as Skylark *Alauda Arvensis* – which were observed at the candidate site during the 2019 survey. Several ponds found at and adjacent to the site were also considered to have a low potential to support Great Crested Newt (with this species known to inhabit the local area), while the habitats were also considered to have low potential of supporting Hazel Dormouse and populations of common reptile.

The updated survey confirmed that all of the trees previously (2021) identified as holding potential to support roosting bats are still present and remain in similar condition. This included 2no. trees with high

potential and 14no. trees with moderate potential. Under the current best practice guidelines[4], any trees assessed to hold moderate/high potential (PRF-M) would require further survey work if these were to be felled, as outlined in section 5.4 of the 2021 PEA report. A disused barn within Field 5 was assessed to have a low potential to support roosting bats and so would also require further survey work (for roosting bats) if this was to be demolished or converted/refurbished as part of the development (as outlined in section 5.4 of the 2021 PEA report).

[redacted]

[4] Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition). Bat Conservation Trust, London

[5] Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*: Developing Best Practice in Survey and Reporting. IEEM, Winchester.

Table 3 – Disturbance risks and protection zones for Barn Owl, adapted from Shawyer (2011).

Activity Type	Example	Disturbance risk (displacement from nest)	Min protection zone	Disturbance risk (displacement from nest)	Min protection zone
		Continuous activity		*Occasional activity*	
Pedestrian Movement	Construction workers walking near nest	Low/Medium	20 m	Low	10 m
Artificial lighting	Arc lights illuminating works but (not directed toward the nest)	Low/Medium	30 m	Low	20 m
Vehicular movement	Vehicles or heavy plant moving past the nest	Medium	40 m	Low	30 m
General building and landscape works	Laying of concrete, bricks, roofing using mechanised plant	Medium/High	60 m	Medium	40 m
Heavy construction works	Ground levelling, piledriving, concrete crushing etc. using heavy plant	High	175 m	High	150 m

Conclusions & Recommendations

As conditions at the site have remained largely unchanged, many of the conclusions and recommendations set out in the 2021 Preliminary Ecological Appraisal also continue to remain appropriate for any future development at the candidate site. In order to inform a planning submission, further survey work may be required for bats, Great Crested Newt and Hazel Dormice (dependant on any future site layout plans). There are also several precautionary measures that would also be appropriate during the clearance/construction/operational phases of any future development in order to safeguard wildlife and other features of ecological value at the site. As previously mentioned, hedgerows, ponds and swamp are all listed as S7 priority habitats, and so any loss of these habitats would therefore require some compensation measures, which could entail new habitat provision or the positive management of retained areas of vegetation.

[redacted]

[redacted]ield parcels 3 and 4, as well as the northern extent of field parcel 2, in the eastern extent of the site could be excluded from any future development, with these areas left as open grassland as part of the site's POS or Green Infrastructure (GI) network. These fields could be left as a 'mitigation zone/biodiversity protection area' and enhanced with the arable crops replaced with a species-rich wildflower meadow mix in order to provide habitat resources for a wide range of wildlife. Doing so would also contribute to the scheme achieving a net gain in biodiversity units.

Therefore in accordance with the current LDP and Planning Policy Wales (PPW 12), any development at the candidate site will need to adhere to the avoidance, mitigation and compensation hierarchy. Appropriate avoidance, mitigation and enhancements measures for the site (as set out in the 2021 PEA) are summarised below:

Avoidance

- Any future vegetation clearance at the candidate site i.e. tree/scrub removal to be undertaken outside of the nesting bird season (clearance possible between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.
- Retention of the site's boundary features and field margins as part of the site's Green Infrastructure (GI) network.
- Retention and protection of all Ancient Semi-natural Woodland (ASNW) and Plantation of Ancient Woodland Sites (PAWS) with appropriate buffers separating these from development.
- Retention of any S7 priority listed habitats (i.e. ponds, swamp and boundary hedgerows) as far as practical.
- Retention of any trees considered suitable of supporting roosting bats.
- [redacted]

Mitigation

- Any loss of S7 priority listed habitats to be compensated for through a combination of compensatory measures which could include new species-rich grassland/hedgerow/scrub

planting, new pond creation and retaining parcels of grassland around the site with these managed as wildflower meadows to maintain resources for pollinators/invertebrates.

- Appropriate mitigation for the loss of ground-nesting bird habitat at the site – e.g. retention of field parcels at or adjacent to the site as arable/open grassland, with 'Skylark plots' provided in these fields. [redacted]
- Design of site lighting to minimise artificial light spill onto boundary features and woodland parcels to limit impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 0.5 lux.
- Covering of any excavations overnight or means of escape provided during the construction phase to minimise risks to any wildlife that may become trapped.
- Dependant on likely impacts of any future development layout (e.g. requirement for hedgerow or woodland breaches/loss), further survey work to be completed for bats (transects and automated surveys), Hazel Dormice and Great Crested Newt to inform specific licensing and mitigation requirements with regards to the proposed development layout.
- Precautionary approach to any clearance of fringe vegetation/hedgerows at the candidate site to safeguard reptiles and common amphibians.
- Creation of 130mm x 130mm gaps at the bottom of any garden/boundary fencing to allow continued connectivity through the candidate site for Hedgehog and other small mammals[6].

Enhancement

- Eradication of Cherry Laurel from the woodland parcels.
- Strengthening of any defunct hedgerow boundaries and/or damaged hedgerow sections with new native scrub/tree planting.
- Provision of bat/bird/insect boxes on retained trees and new buildings.
- Provision of rock/log piles along retained boundary hedgerows and woodland edges for use by common herpetofauna.
- Provision of hedgehog houses/homes within retained woodland parcels.
- Design of any SuDS features to benefit biodiversity.
- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity.

[6] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

- Implement management plan for retained and newly created habitats to maintain and enhance their value to local biodiversity.

APPENDIX I SITE LOCATION PLAN

LAND PROMOTION AGREEMENT MAY 2021

North

SCALE 1:6000 @ A3

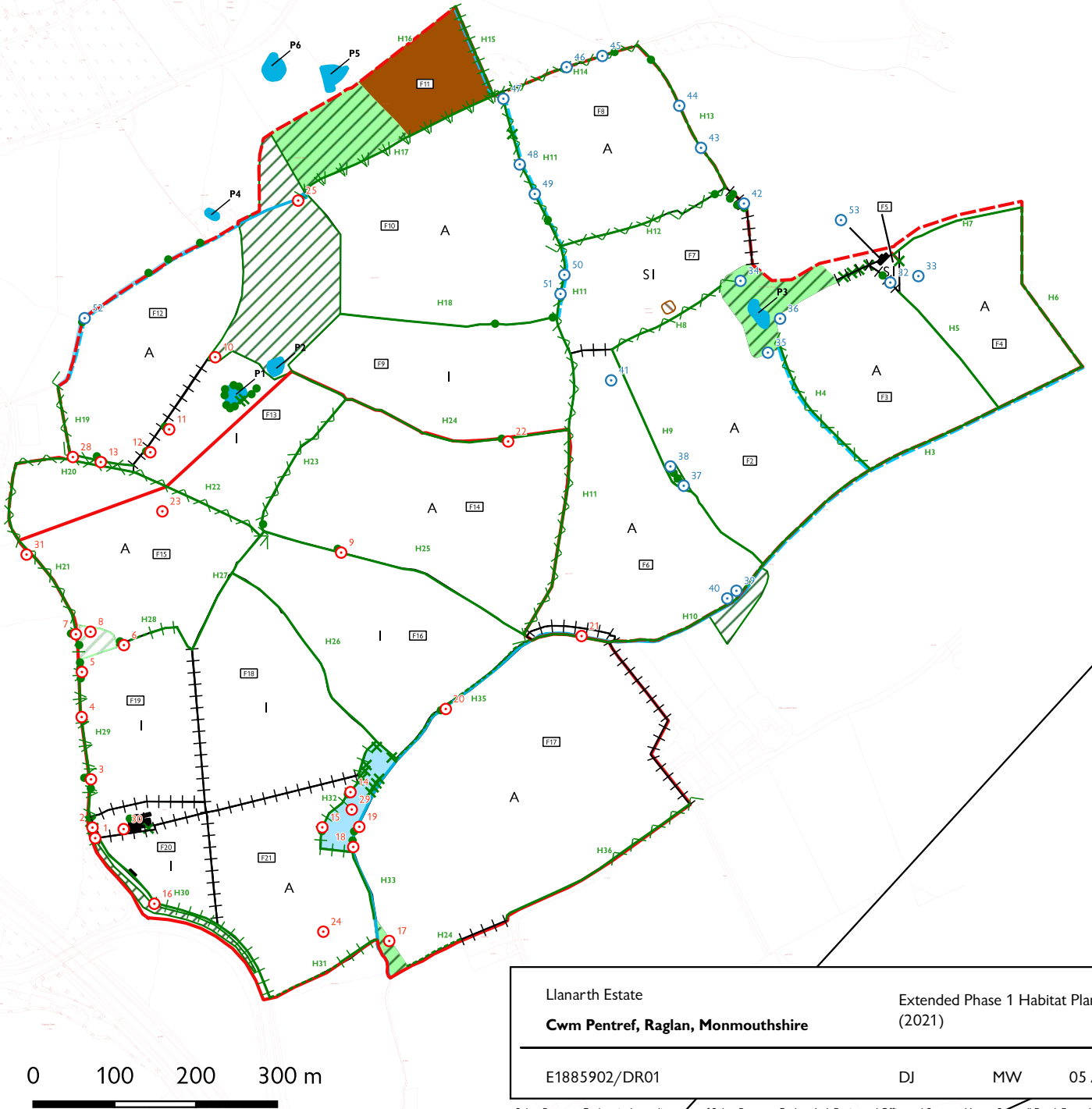
100 m 0 600 m
1: 6,000

PROMOTERS LAND

FIRST OWNERS LAND

SECOND OWNERS LAND

APPENDIX II 2021 EXTENDED PHASE 1 HABITAT PLAN



Key

- Site Boundary/ Survey Area 2019
- Site Boundary/ Survey Area 2021
- A1.1.2 Broad-leaved Plantation Woodland
- A1.2.2 Coniferous Plantation Woodland
- A1.3.2 Mixed Plantation Woodland
- A2.1 Dense/Continuous Scrub
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- B4 Improved Grassland
- B6 Poor Semi-improved Grassland
- C1.1 Continuous Bracken
- C3.1 Tall Ruderal
- F1 Swamp
- F2.1 Marginal Vegetation
- G1 Standing Water
- G2 Running Water
- J1.1 Arable
- J2.1.1 Intact Species-rich Hedgerow
- J2.2.1 Defunct Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- J2.4 Fence
- J2.5 Wall
- J2.6 Dry-ditch
- J3.6 Buildings
- Target Notes 2019
- Target Notes 2021

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Llanarth Estate

Cwm Pentref, Raglan, Monmouthshire

Extended Phase 1 Habitat Plan (2021)

E1885902/DR01 DJ MW 05 August 2021

soltysbrewster ECOLOGY

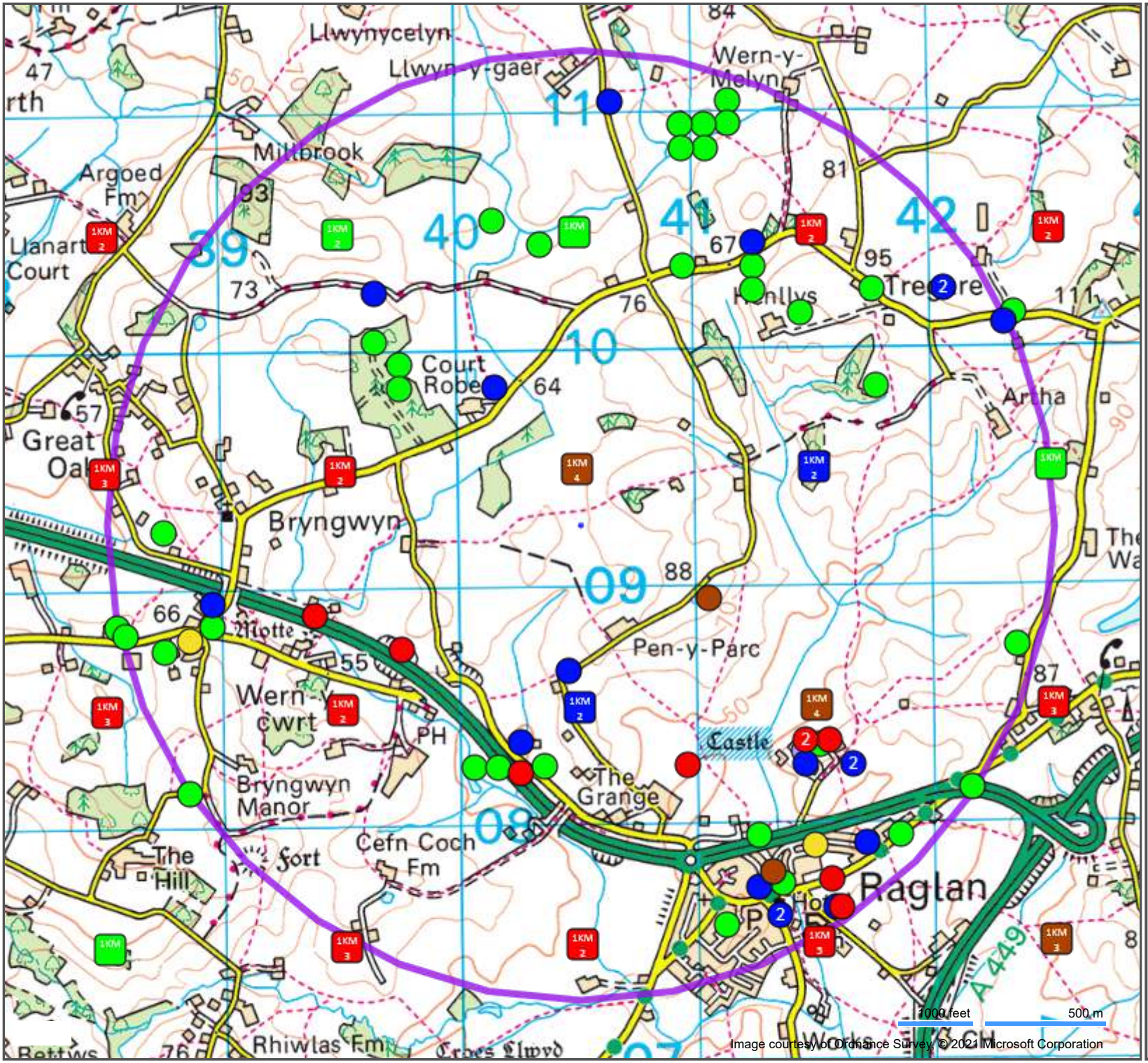
4 Stangate House
Stanwell Road
Penarth
Vale of Glamorgan
CF64 2AA

Tel: 033 00 13 00 12

Email: enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX III DESK STUDY INFORMATION RECEIVED FROM SEWBREC (2021)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CofnodionAmgylcheddol Lleol CYMRU

eMapper for LERC Wales Aderyn Commercial

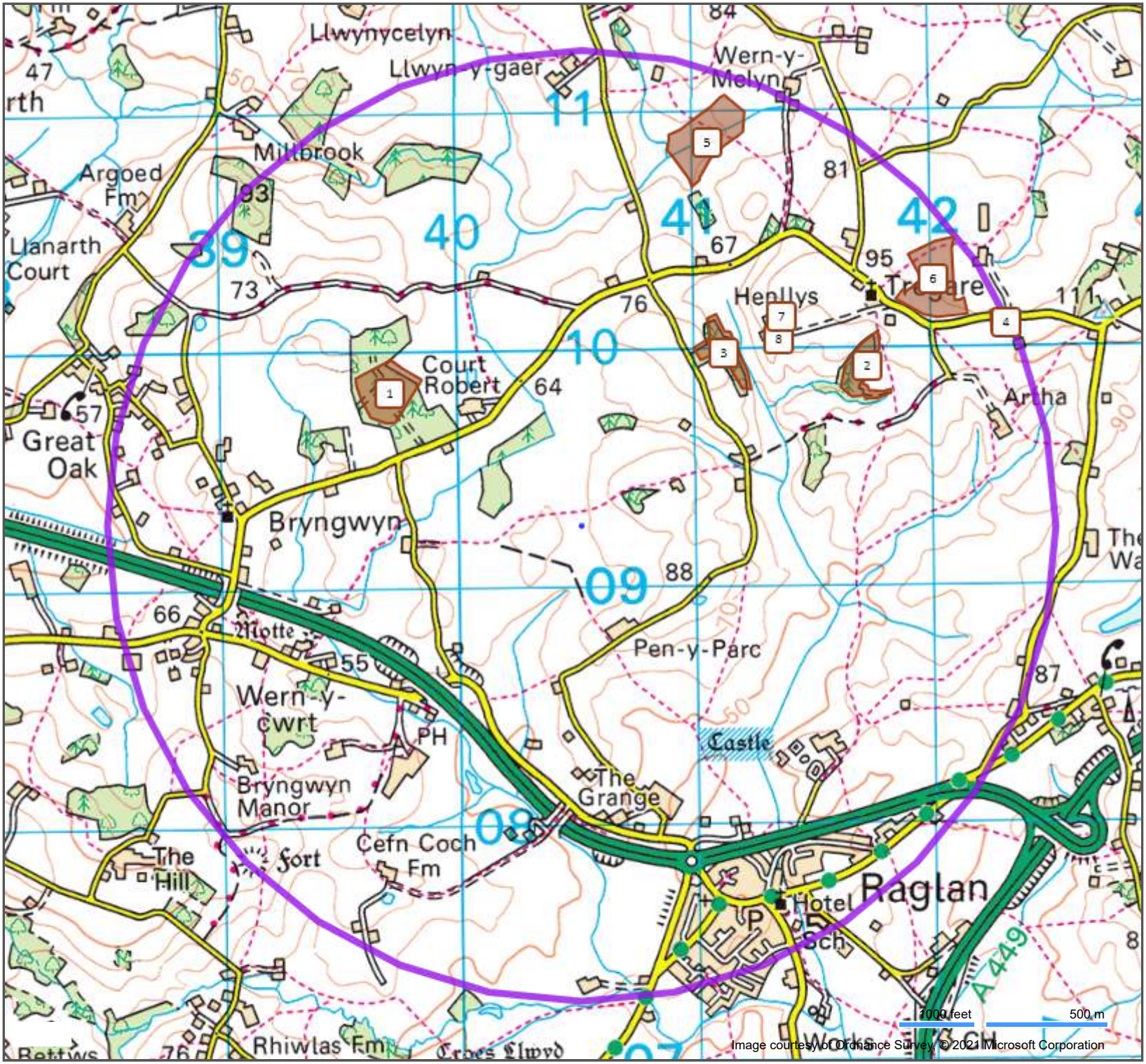
ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf Species Map (Public)

Key

- Search Location
- Search Buffer (2000m)

- **Bees, Wasps, Ants and Sawflies**
- **Birds**
- **Butterflies and Moths**
- **Mammals**
- **Other Invertebrates**
- **Plants**
- **Reptiles and Amphibians**



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDONIAMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

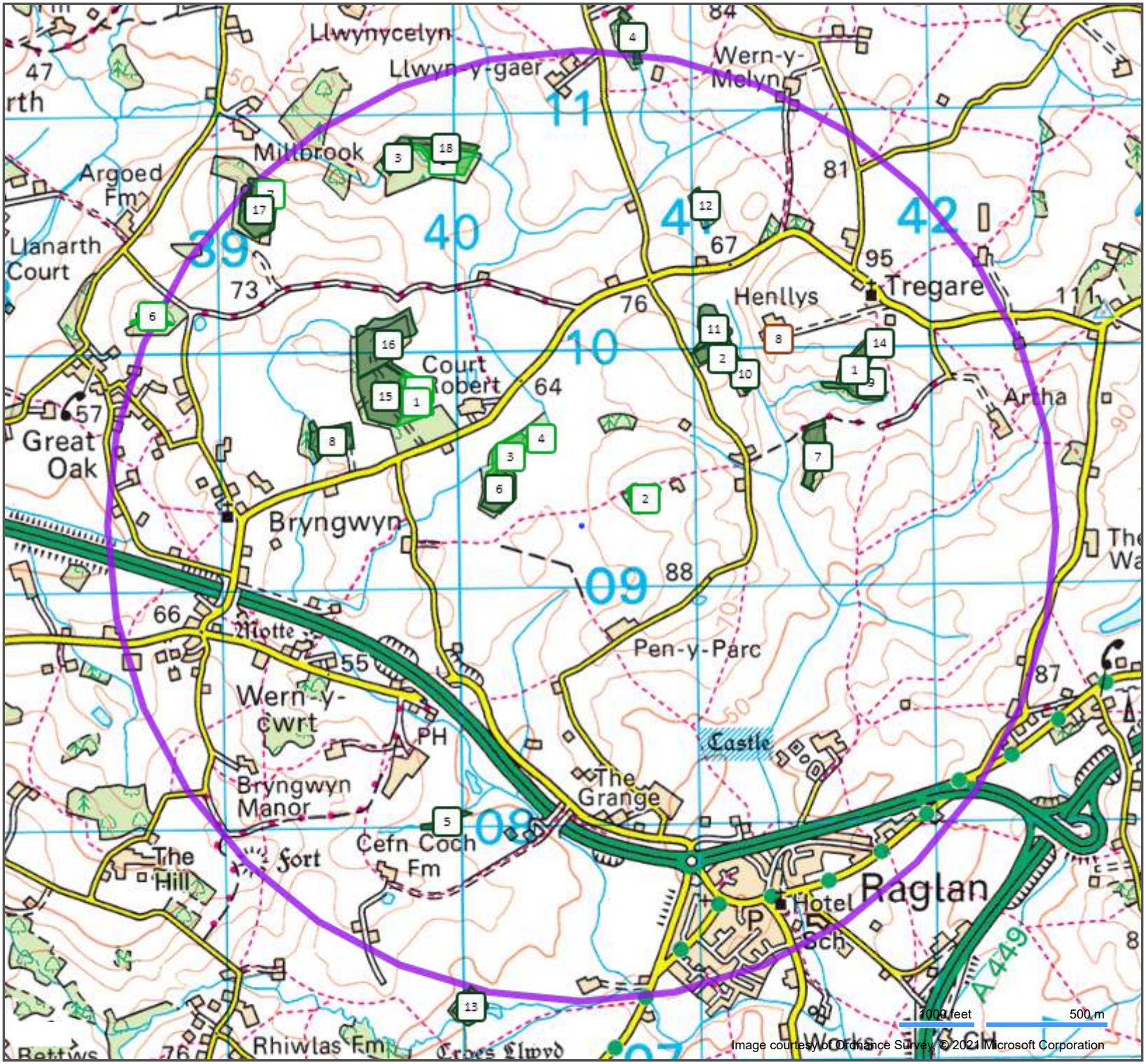
Cwm Pentraf Sites Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Adopted SINC

1. **1**: Coed Robert
2. **2**: Fforest Coed
3. **3**: Henllys Wood
4. **4**: Pen-Y-Walk Meadow
5. **5**: Wern Mellin
6. **6**: Parc-Y-Dert
7. **7**: Henllys Farm (Garden Orchard)
8. **8**: Henllys Farm (Main Orchard)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDIDIN AMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf ASNW Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Ancient Semi-natural Woodland

- **1**: Ancient Semi Natural Woodland
- **2**: Ancient Semi Natural Woodland
- **3**: Ancient Semi Natural Woodland
- **4**: Ancient Semi Natural Woodland
- **5**: Ancient Semi Natural Woodland
- **6**: Ancient Semi Natural Woodland
- **7**: Ancient Semi Natural Woodland
- **8**: Ancient Semi Natural Woodland
- **9**: Ancient Semi Natural Woodland
- **10**: Ancient Semi Natural Woodland
- **11**: Ancient Semi Natural Woodland
- **12**: Ancient Semi Natural Woodland
- **13**: Ancient Semi Natural Woodland
- **14**: Ancient Semi Natural Woodland
- **15**: Restored Ancient Woodland Site
- **16**: Restored Ancient Woodland Site
- **17**: Restored Ancient Woodland Site
- **18**: Restored Ancient Woodland Site

Plantation on Ancient Woodland Site

- **1**: Plantation on Ancient Woodland Site
- **2**: Plantation on Ancient Woodland Site
- **3**: Plantation on Ancient Woodland Site
- **4**: Plantation on Ancient Woodland Site
- **5**: Plantation on Ancient Woodland Site
- **6**: Plantation on Ancient Woodland Site
- **7**: Plantation on Ancient Woodland Site
- **8**: Plantation on Ancient Woodland Site

Adopted SINC

- **8**: Henllys Farm (Main Orchard)

APPENDIX IV 2024 SITE NOTES & ANNOTATED PLAN

Target Note	Description/Comment
***Birds seen/ heard**: House Sparrow Passer domesticus, Buzzard Buteo buteo, Barn Owl Tyto alba, Tawny Owl Strix Aluco, Great Tit Parus major, Pheasant Phasianus Colchicus, Red Kite Milvus milvus, Swallow Hirundo rustica, Herring Gull Larus Argentatus, Wood Pigeon Columba Palumbus, Carrion Crow Corvus Corone, Collared Dove Streptopelia decaocto and Wren Troglodytes troglodytes.* ***Other:** Roe Deer Capreolus capreolus and Speckled Wood Pararge aegeria & Large White Pieris brassicae butterflies.*	
Habitats	
1	Renevated bungalow at Wern-Y-Cwrt Farm. Building is in good condition with new roof and render – negligible roosting potental (previous TN30 in 2021 PEA report). Adjacent barn also considered unsuitable for roosting bats (no obvious features and very open/exposed inside), although Swallow are nesting within this structure. 
2	Area previously mapped as a swamp, surrounded by lines of broadleaved trees, hedgerows and dense scrub (previous TN29 in 2021 PEA report). This was found to be dry at the time of the current survey and contained ruderal species such as Hemlock Water-dropwort *Oenanthe crocata*, Common Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium* and Cow Parsnip *Anthriscus sylvestris*. Hedge Bindweed *Calystegia sepium* is also widespread. Several of the mature trees bordering this swamp have potential to support roosting bats.

	
3	Tree with roosting bat potential (see Target Note 20 in 2021 PEA). This tree was previously considered to hold moderate potential although its condition has since deteriated and now contains more potential roosting features. Now considered to hold high roosting potential (PRF-M). 
4	Tree with roosting bat potential (moderate potential/PRF-M – see Target Note 21 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above and landing within this tree during the current survey.

	
5	Tree with roosting bat potential (low potential/PRF-I – see Target Note 37 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above above and landing within this tree during the current survey. 
6	Dis-used barn found in Field Parcel 5 in eastern extent of the site (previous TN53 in 2021 PEA). The barn contains a Barn Owl box, which at the time of the 2021 survey visit, was occupied by Little Owl *Athene Noctua*. [redacted]  



7

[redacted]









8	Large pond found within parcel of plantation woodland ([redacted]. Pond is approx. 500m² in size and is heavily shaded by adjacent and overhanging trees including Willow, Elder *Sambucus nigra*, Oak *Quercus sp.*, Wych Elm *Ulmus glabra*, Sweet Chestnut *Castanea sativa,* Hawthorn *Crataegus monogyna* and unidentified pines. The banks of the pond are shallow and muddy, with sections densely vegetated by Bramble *Rubus fruticosus* scrub. No emergent vegetation noted, with the surface of the pond covered entirely by Duckweed *Lemna minor.* 
9	Pond found in parcel of plantation woodland immediately north of the candidate site (see Pond 5 in 2021 PEA). This pond was previously noted as being large in size (approx. 500-700m²) although was almost dry at the time of the current survey, with approx. 25m² of open water left. The pond is entirely shaded by the adjacent woodland and is choked by leaf litter and woody debris. Remaining water appears turbid. No aquatic or emergent vegetation noted. Banks are shallow and muddy and support mostly young Willow. 
10	Pond found in agricultural field parcel immediately north of the candidate site (see Pond 6 in 2021 PEA). This pond was completely dry at the time of the survey, with its basin entirely covered by ruderal vegetation. Species present indicate that the pond is still likely to hold water for at least part of the year and include Redshank *Persicaria maculosa*, Common Nettle, Fig-leaved Goosefoot *Chenopodium ficifolium*, Pale Persicaria *Persicaria lapathifolia*, Bittersweet *Solanum dulcamara* and American Willowherb *Epilobium ciliatum*. This pond was almost dried-out during the 2021 survey visit.

	
11	Pond found within small woodland parcel immediately north of candidate site boundary (see Pond 4 in 2021 PEA). This was found to be dry during the current survey although in 2021 was noted to be approx. 200-225m2 in size, with turbid water and large amounts of leaf litter. Yellow Iris *Iris pseudacorus* is still present around the pond's location, indicating it still holds water for at least part of the year. The pond is entirely shaded from the surrounding woodland, with shallow muddy banks that support dense Bramble scrub. 
12	Several well-worn mammal pathways and foraging signs were found throughout parcel of plantation woodland in northern extent of the site – these were indicative of Badger, with no evidence found to indicate they were instead made by other small mammals such as Rabbit *Oryctolagus cuniculus*. No setts were found in this woodland during the current survey. Cherry Laurel spreading in this wood.
13	Pond found on edge of plantation woodland in northern extent of the site (see Pond 2 in 2021 PEA). This pond has reduced in size since the 2021 survey visit, and now covers an area of approx. 100m^2. The pond is heavily shaded by surrounding Oaks and subsequently contains large amounts of leaf litter. No aquatic or emergent vegetation noted during current survey, although Yellow Iris and Water-Starwort *Callitriche sp*. were noted here in 2021. Water appears to be poor quality/turbid.

	
14	Pond in centre of field parcel 13 (see Pond 1 in 2021 PEA). This was completely dry at the time of the survey although in 2021 was noted as being approx. 400m² in size. The pond is partially shaded by Willow and Poplar *Populus sp*. scrub. Limited aquatic/emergent vegetation present, with bankside marginal vegetation comprising of Hemlock Water-dropwort, Soft Rush *Juncus effusus*, Common Spike-rush *Eleocharis palustris* and Trifid Bur-marigold *Bidens tripartite*. 2021 survey visit noted evidence to suggest major waterfowl impact. 
15	Tree with high roosting potential (PRF-M – see TN11 in 2021 PEA). Tree contains a bird of prey nest box. No evidence of use found during current survey e.g. feathers, droppings, pellets.

	
16	Tree with high roosting potential (PRF-M – see TN12 in 2021 PEA). A Tawny Owl emerged from this tree during the 2021 survey visit. Tawny Owl may still be nesting within this tree, with feathers found at the base of the tree and splashing/droppings noted along one of the main branches.  
17	Rabbit warren in small woodland copse.


Satellite Imagery © Google 2024

2952

Candleston Homes

[redacted]

From: [redacted]
Sent: 16 December 2024 08:32
To: MCC - PlanningPolicy
Subject: Deposit Plan Representations
Attachments: Representation Form with sheets.pdf; E24124701 - Cwm Pentref Raglan - 2024 Ecology Note_compressed.pdf

Importance: High

Dear Policy Team,

On behalf of Llanarth Estate, adjoining landowners, Tirion Homes, Candleston Homes, Melin Homes and Sero Homes (together with Sero Energy and perspective commercial partners) we are please to attach our representations.

Our clients have varying interests in ensuring a robust approach to land use planning is taken. It is of utmost importance to ensure that the evidence base underlies appropriate planning interventions in order to address the problems that exist within the County and to create more sustainable and equitable communities that positively respond to the challenges that are faced.

Our clients have previously submitted proposals for a new settlement, Cwm Pentref, at the heart of the county. They have submitted significant background work demonstrating how it could be delivered and the benefits that it could bring. Our clients note the position of the Authority with regards to the level of growth proposed and that LDP's cannot allocate new settlements. Notwithstanding that, given the issues involved, they are keen to ensure that it is clear that their proposal is still a viable and deliverable option albeit for allocation in the SDP.

Our clients include land owners and farming businesses within the central areas of the County that are now more concerned than ever for the future of the rural way of life in the heartlands of Monmouthshire. They are experiencing first hand many of the challenges identified within the various evidence base documents that have been prepared for LDP review over recent years highlighting the factors impacting upon rural communities across the County. These issues include a lack of local workforce and reliance upon workers commuting in due to the unaffordability of local housing, reliance on supply chains outside of the local area, the lack of community and support services, breakdowns and inadequacies in the provision of infrastructure, the increasing cost of land management, time and expense of compliance with increased legislation, the low market prices for produce compared with cheap imports, and the need for direct sales and traceability of food (farm to table). These are all worsening as the LDP review process becomes more prolonged due to inter alia the ongoing impacts of Brexit and the combined effects of the Cost of Living Crisis, inflationary pressures and energy crisis. A continued lack of robust strategy for dealing with these matters will only worsen the sustainability of rural communities. Indeed, this would be disastrous for the County in leading towards even higher house prices, continued lack of range and choice and more restricted demographics where local people have no choice but to leave, particularly the young.

Our clients' previous representations indicate that they believe a step change is required if the County's needs are to be met and if the key challenges facing the Authority are to be addressed. In order to meet these needs and challenges, their proposals for a sustainable new settlement of the County based on zero carbon, 50% affordable housing and best practice where possible

demonstrate that there remains a positive planning intervention that can be made. There is no change in the evidence base that would suggest anything other than such an approach being required. The implications of the Deposit Plan maintaining the status quo and continuing previous trends (lack of affordability, ageing population, out commuting etc) mean that the current situation will be exacerbated and the subsequent review of the Plan will prove even more challenging.

Our clients believe that with regards to the distribution of future growth, just adding incrementally to existing settlements alone will not address the key issues faced, the lack of supply, infrastructure constraints or delivery; nor will it provide a genuine opportunity to plan for the future needs and aspirations of the County on a long term basis including new work/life practices and a shift towards healthier more active lifestyles. Similarly, a large commuter extension at Caldicott will reinforce existing patterns of growth and outmigration.

Rather, our clients remain supportive of an appropriate level of growth led by the provision of a new settlement with complimentary growth across the remainder of the Authority and still believe that it is unsound and inappropriate to remove a positive planning intervention that has the potential to deliver significant benefits. Indeed, such an approach can positively address the Well Being of Future Generations Act and create a vibrant and active community with a wide range of land uses and activities – supporting the surrounding rural area as well as stimulating and encouraging growth. Our view is only strengthened by the impacts of Covid 19 and the move towards sustainable living in local communities and working from home.

As we have stated previously, our clients do not believe that the Authority should simply accept growth at any cost. Indeed, our clients believe that a new settlement in the right location would provide an appropriate long term opportunity to move away from existing problems, constraints and issues. It could provide a step change in the approach to the future well being of the County over the current, and future, plan period. It can also provide a Europe leading approach to best practice in the delivery of communities and places. A new settlement planned with sustainability at its heart provides an opportunity to respond to the unique circumstances in Monmouthshire to set an agenda for a new, modern and sustainable way of living appropriate to its location whilst benefitting surrounding settlements. As demonstrated in our clients' supporting evidence, this sets out the aspiration to provide 50% affordable housing, allowing new residents to fill local jobs in the agricultural, care, catering and tourism industries and a major leap towards net carbon zero – it can provide the step change that the County requires which would lead the development industry nationally.

We note that adopting a lower growth scenario favoured by the Welsh Government means that the key issues can't be addressed and it will be inevitable that a new settlement (or equivalent step change) will need to be considered in a future Strategic Development Plan (SDP) in order to address the problems identified and exacerbated. Indeed, we believe that it should be eminently feasible for an LDP to "dovetail" with an SDP, and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process.

We recognise that the Local Authority is constrained with regard to the ability to allocate a new sustainable community, however, our clients would like to emphasise the fact that their proposal remains a viable option for the SDP in due course. I note that more recent ecological work has been undertaken on the site and I also attach this for your records.

Our answers to the questions posed in the consultation are set out within the attached and our response is based on a provision of options that will respond to the updated LDP objectives, the Welsh Government's placemaking objectives and Well Being goals.

Our clients are more than happy to meet with the team as in due course if you would like to discuss any aspects of the proposal.

Kind regards

[redacted]



[redacted]

REGISTERED ADDRESS: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ
DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	[redacted]	[redacted]
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not carried through to the deposit version of the Plan and are not available for the Authority to make.

1.2 Our clients consider that the overarching aims of the Plan are unobjectionable and in line with the evidence and Planning Policy Wales. Our clients' fundamental concerns however, relate to the level of disconnect between the evidence base, the issues faced and the artificially constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the tests of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 A failure to provide sufficient housing to meet the current and future needs in terms of scale and affordability will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. Monmouthshire is already one of the most unaffordable places for people to live and it has a higher proportion of outright owned larger family homes than in surrounding authority areas. Levels of need for elderly care and support are increasing and there is a lack of locally available care provision available to meet increasing need. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.4 We also raise concerns over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan alternatively the period for this plan should be extended to 2038 with additional allocations identified.

KEY ISSUES AND CHALLENGES

1.5 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP depending upon lead in times for development and viability.

1.6 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) supported a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.7 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenarios upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.8 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. For instance, the evidence base for Future Wales recognises that the broad housing figures that are suggested therein are based on past building rates which themselves are constrained due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.9 We also note that there are significant challenges facing rural businesses and communities including in respect of agriculture, forestry, tourism and care. These sectors have been particularly hard hit by trends that are impacting upon the supply of workers. Indeed, our clients are strongly of the view that greater consideration must be given to the rural economy and workforce generally and specifically the lack of affordable accommodation for those workers and a range and choice of housing for residents wishing to downsize within or close to their local communities, so they do not need to be displaced from the support structure they require. For instance, there is significant concern that many farms and/or agricultural units are becoming unviable and there is little being actively done to discourage them from diversifying or being lost;

1.10 Without a positive approach towards the future of the Authority it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts at the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of further comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";

- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted;
- our clients are of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.
- our clients believe that the Vision should include reference to the agricultural core of the County. Given uncertainties surrounding the future of farming and other rural activities (eg quarrying, forestry), lack of affordability and availability of a local workforce, there is a very realistic prospect that agriculture could be substantively gone in the Authority by 2033. Our clients own over 30 farm holdings and over 1500 ha of agricultural land in the centre of the County, each year it is more difficult to sustain such holdings when there is a lack of affordable homes for rural workers at the heart of the Authority. Commuter estates at Caldicot will not provide sustainable local housing to support businesses and residents in the rural heartland where they need it; much of rural Monmouthshire's landscape and character relies heavily on the stewardship of agricultural holdings, and the maintenance of this is time consuming and expensive with the need to pass on skills to future generations together with a wider understanding of the processes and farming methods involved in long term stewardship, protection, and enhancement of some of the County's most attractive attributes. Partnering with a not for profit society will bring forward housing to rent at below market rents ensuring key workers can access suitable accommodation locally; and
- Our clients welcome the inclusion of reference to a zero carbon County in line with Monmouthshire's declaration of a climate emergency and commitment to do all it can to help address the emergency.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives and comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasicity of supply in the housing market means that affordability

	demography and socially and economically sustainable communities.	will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places.
13	**Rural Communities** To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	Our clients are strongly of the view that a distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Indeed, it is often the smaller more remote settlements where property supply is limited and prices are highest and our clients consider that proportional growth is therefore appropriate in these locations provided appropriate infrastructure and community facilities exist to ensure the settlement is truly sustainable. However, this should not be at the expense of proposals that seek to address the much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural "way of life" ought to be the objective, as opposed to provision of large estates along the M4 corridor. Furthermore the particular difficulties faced as a result of Brexit and the lack of trade deals means that being self-sufficient and able to produce our own food is of primary importance. This is also of global importance by reducing the number of food miles some goods travel to reach market.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our clients are significantly concerned by the approach taken towards restricting growth in the Local Authority which itself has fallen by up to 30% since the 2021 Preferred Strategy Consultation and does not reflect the evidence.

1.2 Our clients are concerned that the approach taken has been entirely shaped by the Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Indeed, since we submitted previous representations on the higher growth strategy sought, the wider socio-economic circumstances have changed considerably with inflation, increases in the cost of living, energy prices etc. Adding these to the impacts of Brexit and Covid 19, our clients remain of the view that there must be a duty on every LDP to promote, encourage and foster the highest possible ambitions for achieving sustainable growth. In this regard we still believe that the approach taken to rule out a new settlement does not reflect long term planning aspirations or the specific circumstances of the County.

1.3 We are concerned that there is a significant conflict with Future Wales in the case of Monmouthshire, where the Welsh Government's position blocks a Plan-led intervention that can positively address the issues identified and hinder sustainable placemaking. The challenges facing Monmouthshire are very well acknowledged across existing policy, strategy and research documentation including the research that has shaped the previous iterations of the replacement LDP and the consideration of growth options. Indeed, it is well known that the housing market reinforces these issues and without positive interventions (i.e increasing the supply of new homes of appropriate size and tenure), there will be further worsening of matters such as the sustainability of services, the ageing population, high levels of in- and out- commuting (general lack of sustainability) and affordability. These issues have both economic and housing market implications as well as in respect of society and inequalities putting pressure on social care particularly for the isolated elderly.

1.4 Indeed, it is stated at para 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.5 These requirements shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.6 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4.

1.7 For Option 3 (4770 homes over the plan period plus a 15% flexibility allowance so 5485 in total), the evidence base indicated that this level of growth would result in inter alia:

- ***"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.8 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts would still exist:

- ***'Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.***
- ***Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."***

1.9 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- "***This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.***
- ***Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.10 It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- ***"Growth Option 1 is identified as best performing against ISA (integrated Sustainability Assessment) themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."***

SOCIO ECONOMIC CONTEXT

1.11 Hardisty Jones Associates (HJA) are widely experienced economists specialising in development needs and impacts. They were commissioned by our clients to consider the socio-economic context for Monmouthshire, specifically considering the central parts of the Authority which form the rural core. The results of their research reinforce the point that lower growth levels as envisaged would exacerbate the already significant problems experienced in the County and its rural communities and key workers.

Demographics / Age Profile

1.12 HJA note that the age profile of the central rural part of the Authority is largely an exaggerated version of that witnessed throughout Monmouthshire. It can be summarised as aged and ageing, including:

- An older population i.e. a high proportion of residents aged 65+ years, and a high proportion aged 50+ years, with shares in these age groups having increased over the last 10 years;
- A high proportion of retired residents and low proportion of households with dependent children; and
- A decrease in resident population under 50 years since 2010.

1.13 The Growth and Spatial Options Assessment previously undertaken confirms that the level of growth sought will not address these issues compared to the previous level of growth suggests it will. A higher level of growth is required in order to make a step change in this profile.

Housing Stock

1.14 The housing stock in the rural heartlands of the County is characterised by a greater proportion of larger properties. There is relatively low diversity of stock in terms of size, typology and tenure. This provides very limited choice in the market.

1.15 The share of households that own their property or privately rent is much higher than benchmark locations, and the share of homeowners that own their property outright with no mortgage is also much higher. The tenure profile exhibits a much lower share of households in social or private rented accommodation, and a very low proportion falls within affordable tenures.

1.16 A limited growth strategy will exacerbate this trend.

Affordability

1.17 Median house prices in the central part of the County are higher than other benchmark locations. This is at least partly driven by the size profile of the dwelling stock. Lower quartile house prices across the dwelling stock have consistently remained above the Monmouthshire equivalent. Average household incomes are low compared to many parts of Monmouthshire.

1.18 Housing affordability is significantly worse in Monmouthshire than Wales overall. The higher house prices and lower incomes data would suggest the local position in the heart of the County is worse than the district wide average. The housing mix is a contributor to this problem with such a high proportion of large detached and semi-detached properties and relatively few smaller properties and affordable tenures.

1.19 Housing affordability is without doubt a significant issue in Monmouthshire that must form a central component of any strategy. Accessing housing in rural areas is a challenge that extends beyond Monmouthshire, however, the County is the least affordable of all rural areas in Wales. The Local Housing Market Assessment has identified huge affordable housing need, way beyond what is deemed 'reasonable' to deliver via the Revised Local Development Plan.

1.20 Alongside the fact that policy would be unable to tackle the full extent of the challenge, sits the delivery challenge. Levels of development of both market and affordable housing over the current LDP period have fallen below targets (for a range of reasons including viability and technical constraints). In part this contributes to current need. In order to deliver the identified housing requirement and achieve ambitions around addressing the ageing demographic profile and reducing commuting levels, there is a need for an alternative level of growth which is higher than previously assessed.

Economy

1.21 Economic activity rates are generally high and would be very high if not for a substantial proportion of early retirees in the area. However, the area has experienced relatively weak employment growth, with declines in the local area prior to the Covid 19 pandemic. This is set against rising employment across wider benchmark locations and the current cost of living crisis and economic recession in the UK.

1.22 A restricted growth scenario (that retains the overall imbalanced age profile) is not going to address the fundamental problems.

1.23 From an economic perspective there is ambition to see a thriving and diverse economy. This will need to build on both inward investment and innovative, competitive indigenous businesses. This will certainly need to include developing existing rural based strengths and key sectors including tourism and leisure, food and drink and agri-tech as well as manufacturing, technology and digital activities. Farm practices will need to be future proofed to ensure they survive and the County continues its role as an important source of local produce. It needs to ensure the agricultural base is supported with key workers based locally and trained, with agriculture being recognised as an important industry essential to the health and wellbeing of local people. This is an approach advocated by the Welsh Government in their “Food for Wales, Food From Wales” document on local food production. None of these challenges can be met absent a robust and sustainable approach to planning interventions.

Commuting

1.24 There are large commuting flows both in and out of the County and the local area. Generally, essential workers (including key workers) commute into the Authority to take on important roles with more affluent workers commuting out of the Authority to urban centres such as Bristol, Cardiff and Newport. These levels have stayed broadly constant, or possibly increased, over the last 10 years despite policy ambitions to reduce these flows. The removal of tolls on the Severn crossings increased these figures as commuting costs have reduced.

1.25 These are clearly not the characteristics of a sustainable and equal place and addressing these challenges must be a key requirement of any Plan if the Council's obligations under the Well Being of Future Generations Act are to be met. Adopting a level of growth as is being suggested by Future Wales is in clear conflict with the evidence base which can only worsen this situation.

1.26 It is fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own entirely different but equally challenging issues that need to be addressed. It isn't possible to consider the whole of SE Wales as one when focusing on deprivation in previously industrial areas will not maintain the food producing heartland of the east of the region.

MEETING NEEDS

1.27 PPW12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.28 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County.
- Artificially low growth would impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. The pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable. Difficulties in sustaining services and facilities across the County will result in rural isolation.
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation.
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients strongly object to the current approach towards Spatial Strategy which does not adequately address the key challenges faced by rural communities.

1.3 We remain surprised and disappointed that perhaps the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. As we have previously commented, such an approach provides the step change required in the County. Notwithstanding this, with regards to the other potential components we note Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

Existing Infrastructure and Constraints

1.4 Many existing settlements (in all tiers and including the Strategic Sites) are subject to numerous constraints (including land assembly, landscape and nature designations such as AONB, SSSI, SAC etc) third party constraints, transport, facilities / services, foul and surface water drainage, phosphates, air quality etc.). It will therefore be vital to ensure that an adequate ownership and infrastructure plan is prepared to ensure that existing constraints are overcome with suitable levels of investment.

Distribution

1.5 Given the significant issues facing the central and northern parts of the Authority, our clients are concerned that 44% of growth is to be directed towards the M4 corridor / Severnside settlements which accommodate around 20% of the population, rather than spreading more evenly across the County in line with the other 80% of the population. This will not enable local needs to be met fully and will not address the key challenges in terms of demographics and affordability. Indeed allocating just 14% of growth to the significant number of Tier 2 and 4 settlements reinforces the existing trend of larger properties that are unaffordable for local people and key workers.

1.6 Similarly, whilst clusters have been identified for Severnside, Chepstow and Abergavenny, the strategy does not recognise the fact that there are a large number of other communities in the northern part of the County that are based around a hierarchy of hub and clusters with service centres serving a wide rural hinterland, around which sustainable patterns of movement and growth occur.

1.7 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key

issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

Sustainable development

1.8 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.9 Indeed, Creating and Sustaining communities is one of the Key Planning Principles listed in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.10 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."***

1.11 There are of course many other examples of relevant policy and Welsh Legislation requiring a sustainable approach towards development and meeting needs which we do not repeat here in the interests of brevity. However, it is clear that not addressing problems which will achieve sustainable development by balancing needs and addressing inequalities is contrary to the overarching objectives of the planning system.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.12 We are strongly of the view that a new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority.

1.13 It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

SOURCES OF SUPPLY (TABLE 2)

1.14 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as: following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply requirements are not realistic and appropriate having considered the evidence; and

- restricting the level of housing (location, range, choice and number) available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.15 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (ie between 2018/19) and 2023/24), existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principle source of sites to contribute towards the RLDP.

1.16 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward than for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.17 Such historic under delivery will have had a significant adverse effect on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.18 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.19 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.20 Given the above, we believe that 230 is highly optimist and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.21 We welcome the approach taken towards the trajectory by the Council in general. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particularly against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.22 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth.

Caldicot

1.23 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application followed by a tender and sales process further delaying delivery.
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- As noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year , such that RM's for early phases are not in a position to be submitted until 2029 and pre-commencement conditions discharged thereafter; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.24 Given the above, we note that at least **320 dwellings** that are in the current plan period will be delivered in the next period.

Abergavenny

1.25 We note the comments in the Background Paper, however, not withstanding that we submit that:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, (absent a timeframe for submission of an application), it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would not be submitted until early 2029 and pre-commencement conditions discharged subsequently; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.26 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

FLEXIBILITY ALLOWANCE

1.27 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward, the previous LDP having under delivered by 33% and as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.28 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.29 We have already set out our concerns regarding the level of growth in representations in respect of this which consider that the approach to growth should be more positive. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.30 It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 6. Do you have any comments on the climate change and renewable energy policies?

STRATEGIC POLICY S4 – CLIMATE CHANGE

1.1 Our clients support the overarching aims of the policy however, we believe that this ought to be applied to new allocations within the Plan on a site by site basis. Our clients believe that each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.

POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

1.2 Our clients are supportive of the approach taken. It is noted that their proposals for a new settlement demonstrate what is achievable, in particular a truly zero carbon community that uses the latest technology to generate and store the energy it needs as well as turn local waste into power and centralised recycling facilities and a pyrolytic plant to turn waste products into energy, reducing the net waste produced. This is possible due to the scale of the proposal and the unconstrained and significant land ownership.

1.3 They propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity at localised energy centres to power local transport, community facilities, homes and businesses. Surplus power will be exported to the national grid.

1.4 Phosphate free fertiliser as a bi product of the anaerobic digestor will be available for local farms to protect biodiversity. On plot micro power generation, such as ground and air source, solar and photovoltaic technology will be incorporated as a standard building design element alongside fast charging points, energy storage and high-performance thermal envelope.

POLICY CC1 – SUSTAINABLE DRAINAGE SYSTEMS

1.5 Our clients are supportive of the policy. It is noted that their proposed new settlement provides a nature-based solution which will secure a net biodiversity gain. Benefits will be seen at all scales from window boxes and planters, individual gardens, community allotments and orchards, to interconnecting green corridors, site wide planting and SUDs networks.

1.6 Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, linking into 125ha of new habitat within green space. New habitats will include meadow creation, wetland, woodland, hedge planting and specimen trees incorporating native plant species.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?

STRATEGIC POLICY S5 – GREEN INFRASTRUCTURE, LANDSCAPE AND NATURE RECOVERY & POLICY GI1 – GREEN INFRASTRUCTURE

1.1 Our clients are supportive of the approach taken by S5 and GI1. Their proposals for a new settlement demonstrate how green infrastructure, landscape and nature can thrive with innovative solutions, indeed, they propose creating over 125ha of new habitat and green spaces from intensively farmed land. Their approach taken seeks to ensure that their proposed community delivers an open, accessible and engaging environment. Interlinked open spaces will bind each neighbourhood together, increasing opportunities for recreation, helping and strengthen wildlife corridors and allowing people to move freely. Parkland will create a visitor destination in its own right and an important education resource.

1.2 Their proposed landscape strategy is based on six key components:

- The connection of two central but fragmented pieces of woodland. This ecological and recreational resource will be supplemented by a significant new native woodland;
- The creation of a new green spine running north-south through the residential areas, serving as an arterial route, transporting people via public bridleways, footpaths and cycleways through a mosaic of ecologically diverse habitats and connecting two fragmented stream catchments;
- The provision of two new public parks, offering individual amenity experiences at (i) Hilltop Park, with glamping and tourism and (ii) Wetland Park, based on the existing damp grassland area to the south-west;
- Four distinct neighbourhoods, based around community facilities, including communal growing spaces and play areas. These will be connected to a walkable village centre with footpaths and greenways based around existing hedges and field boundaries;
- The creation of a dedicated sports hub; and
- The creation of a patchwork of meadow and woodland, providing amenity-rich landscape, a highly sustainable and healthy wildlife resource and a dynamic rural-to urban interface where the urban environment blends seamlessly with open countryside.

1.3 In addition, and of significance their proposal is based around providing a positive contribution towards dealing with phosphates, and a mitigation strategy that ensures phosphate neutrality for the proposals but will also free up enough “credit” in order to facilitate a minimum of an additional 1,770 dwellings elsewhere in the north of the Authority, if desired. This can be increased to up to 6,000 dwellings through various measures.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY S7 AFFORDABLE HOUSING

1.1 Our clients are supportive of the aspiration to provide 50% affordable housing on allocations. In order to meet the known demographic needs of their local area, they have demonstrated on their proposals for a new community that fifty percent (50%) of housing can be affordable, including specific provision for key workers. In addition participating development partners will deliver below market rental properties. This will be a whole life community for all focused on the needs of residents including providing high quality assisted living units and care accommodation.

1.2 We have previously submitted detailed information with regards to the innovative approach our clients are taking in working with delivery partners, Tirion, Melin and Candleston in order to lead on a model for delivery. The development partners have proven track records of delivering a wide range of quality homes catering for all sectors of society. For ease I set out a summary here which helps to support the policy and demonstrate what is achievable.

Tirion Homes

1.3 Tirion is an independent not-for-profit Community Benefit Society delivering large scale mixed-tenure housing regeneration with a focus on affordable homes. They add value through innovative finance, design excellence and collaboration. They are currently delivering a portfolio of over 1500 units on regeneration sites in Cardiff, Newport and Tonyrefail. Tirion has developed an innovative long-term finance model with M&G Investments facilitating the delivery of over 50% affordable housing on their sites without any Social Housing Grant. The Tirion Model is particularly suited to large scale collaborative projects where the delivery of affordable homes improves rather than hinders viability through highly efficient finance.

1.4 At Ely Mill Tirion has also facilitated the development of a cluster of start up businesses “The Boneyard” which includes a café with pizza oven, therapy facilities, food producers, jewellery makers and crafters, a pottery workshop, furniture upcyclers and a plant emporium.

Melin Homes

1.5 Melin Homes seeks to be a dynamic organisation that works with others to make a positive difference to the people and communities they work with. They provide quality homes and services in Blaenau Gwent, Monmouthshire, Newport, Powys and Torfaen. As a registered social landlord, they work closely with local authorities and other partners to build thriving communities. Their mission is to make a positive impact on neighbourhoods by providing high-quality social housing to those who need it and pride themselves on providing an excellent service to customers.

1.6 Melin has over 4,500 units of accommodation and is on site with a large number of new homes for residents over many different locations. These houses form part of their commitment to develop 1,000 houses over 5 years. They seek to be an independent, ethical and sustainable business that delivers growth within their operating area. Their approach to growth is consistent with the business

approach to thinking longer term and being mindful of the five ways of working set out in the Well-being of Future Generations Act and the seven well-being goals set out in the Act.

1.7 Melin also hosts Y Prentis, a shared apprenticeship scheme which is jointly owned with Monmouthshire Council which was established to meet the increasing demands of socially procured goods, services and works associated with the construction industry in south-east Wales. Since its inception in 2012, Y Prentis has made a real difference in helping to train more than 300 apprentices, supporting more than 120 partners and helping to deliver in excess of 650 qualifications, making a real life positive contribution to the region.

1.8 As an organisation they continue to look forward, to meeting the challenges faced with enthusiasm, determination and imagination, and to reporting on their continuing journey to providing the highest quality homes and services to the people and communities they serve.

Candleston Homes

1.9 Candleston Limited is a wholly owned subsidiary company of Melin Homes and operates in South East Wales. It has been established to develop a reputation as a leading house builder of high-quality sustainable homes, whilst making long-term investment into communities and generating returns for Melin to further its charitable objectives.

1.10 They have delivered a number of new homes across Monmouthshire. The team are working hard on establishing a pipeline of opportunities in strategic locations and have become an essential part of the Melin Homes Group delivering new homes and augmenting the affordable homes provision across the region in which Melin operates.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 13. Do you have any comments on the visitor economy policies?

STRATEGIC POLICY S12 – VISITOR ECONOMY

1.1 Our clients note the significant role that the visitor economy plays in Monmouthshire and in particular its importance to the tourism economy. In addition to supporting local business, there is a need to contribute to the broader needs of the local and national economy. Tourism is of significant value to Monmouthshire, with 2017 statistics showing an influx of 2.24m visitors to Monmouthshire, which provided a £219m boost to the economy with 2,989 jobs supported by the sector. (Visit Monmouthshire, www.visitmonmouthshire.com/ tourism-business-support.aspx), Tourism Performance (2017). Cycling alone is a major contributor to the Welsh tourist industry. Visit Monmouthshire explains that "According to the 2015 Great Britain Tourism Survey, cycling is worth £90 million to the Welsh economy through daily visits and stays. Around 300,000 overnight visits to Wales each year involve cycling and/or mountain biking with an annual worth between £55 and £60 million." (Ibid)

1.2 Within their proposed new community, there are opportunities to connect areas of cultural heritage, education, camping and sports facilities to provide a healthy environment for both residents and visitors alike. There is huge potential, therefore, to take advantage of this burgeoning industry, develop existing facilities and make an even greater contribution through additional connectivity. There are also proposals for an equestrian centre which will be combined with substantial investment in public bridleways to provide a well-integrated set of facilities for horsemanship and exercise.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 14. Do you have any comments on the sustainable transport policies?

STRATEGIC POLICY S13 – SUSTAINABLE TRANSPORT

1.1 Our clients are supportive of the approach taken towards sustainable transport. It is noted that the policy includes reference to enabling solutions to rural transport issues. Our clients are well aware of the problems faced by rural communities and would like to draw the Council's attention to the benefits that an unconstrained new sustainable settlement could bring.

1.2 Indeed, in their proposals active travel, health and wellbeing, and mobility for all will be the key guiding principles in developing travel plans and sustainable travel choices for their new settlement. It includes a number of innovative solutions towards rural accessibility issues. Cwm Pentref will cater for all the needs of its residents so that they do not need to make distant journeys for basic needs and services.

1.3 It will establish a sustainable transport hierarchy that prioritises public transport, riding, walking and cycling over the use of the car with most facilities within walking distance. As a consequence the following measures are proposed:

Electric shuttle bus & Transport hub

1.4 Located just off the A40 a transport hub is proposed to connect residents, businesses and tourists to the surrounding major cities, towns and villages. An electric bus service operating from the hub would circulate within the site and provide internal connections to local train stations, local centres, school etc. In connection with a number of proposed car-free zones, this service would help ensure that all parts of the development can be easily accessed without having to revert to car travel. The hub would also provide cycle parking and connections onto a site wide footpath and cycle network.

1.5 Bus services operating from the hub would circulate within the site and allow onward bus connections to be made from the hub to Abergavenny, Raglan, Monmouth and Newport. The bus service to Abergavenny would be synchronised with the rail timetable and connect to the King Henry VIII secondary school.

Self contained and sustainable internal movements

1.6 It is proposed that within the development specific areas will be car free and the surrounding neighbourhoods will be within easy walking or cycling distance along a network of cycle and walking routes which have been planned to link all areas within the scheme and local points of interest (Raglan Castle and village, garden centres and local pus and restaurants as well as the nearby gliding centre).

1.7 An interconnected network of over 18km of footpaths and cycleways will provide a safe, off road, choice of routes through the development including safe walks to schools.

1.8 High quality bike storage will be located at strategic points such as the transport hub and local centres to encourage residents to use sustainable transport methods. Routes have been linked to the existing Public Rights of Way (PRoW) crossing the site to allow wider access to the network including National Cycle Routes and an existing National Trail. Footpath and cycle connections between the site and Raglan to the south east will be assessed and improvements explored. Furthermore opportunities will be explored in consultation with Sustrans to extend the network.

1.9 All dwellings will have their own covered cycle storage and sufficient cycle storage will be located at areas of general assembly (local centres, schools etc) and at all the nondomestic buildings.

1.10 The car free areas will be supported by nearby parking generally within 50m of a dwelling. The theme will be walkable neighbourhoods with facilities within 800m. Bus services within the development will be within 300m (max 400m).

EV priority

1.11 Electric Vehicle (EV) charging points will be provided to a substantial number of car parking spaces. These charging points could be connected to PV panels, battery storage and/ or other forms of renewable energy generated across the site (such as the CHP plant in the energy centre).

1.12 For on plot parking private carports will be preferred over garages and the carport roofs can be used for PV (Flexi-solar or similar).

1.13 Over and above walking and cycling, electric car charging and public transport, it is envisaged that a Car Club would be set up with spaces provided at convenient pick up locations throughout the development. In addition, on site infrastructure would be designed to enable future use by connected autonomous vehicles (CAVs).

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 16. Do you have any comments on the community infrastructure and open space polices?

STRATEGIC POLICY S15 – COMMUNITY AND RECREATION FACILITIES

1.1 We are supportive of the approach towards community facilities and recreation,

1.2 Our clients proposal for a new community demonstrate how master planning can deliver sustainable places based around community facilities. Central to their proposal for instance, localised neighbourhood centres will provide access to a wide variety of facilities including shops, business support, schools, health and social care facilities. These centres will be car free places linked to the bus and cycle network. Outdoor market spaces, and communal open areas will encourage farm enterprise and community cohesion.

1.3 Onsite energy centres will distribute locally generated power to the neighbourhood. They will incorporate site management offices and space for the emergency services. Additionally a repair workshop and upcycling centre with tool and equipment hire will be available alongside digital hubs to manage fibre to home connectivity and conferencing infrastructure providing technology support for home working.

1.4 The proposals also seek to create a network of Community Hubs, focused on local energy centres linked by the site's electric bus route and cycle network. These hubs will provide flexible co-working spaces, community rooms for meetings, training, events and classes (such as yoga, brownies, antenatal classes), recycling centres, postal distribution and collection centres, cafes, and space for faith groups to meet. Attached to each hub, a group of almshouses for the elderly and a children's day nursery seek to ensure that different generations can integrate and support one another.

POLICY CI2 – PROVISION OF FORMAL AND INFORMAL OPEN SPACE AND ALLOTMENTS / COMMUNITY GROWING AREAS

1.5 Our clients are supportive of measures that aid the local production of food. Indeed, this is an important component of their approach to their proposed new settlement, which seeks to champion local growers and producers both on and off site. From locally reared meat and dairy, to baked goods and honey, and fruit and vegetables. Their proposals will provide the infrastructure necessary to deliver fresh goods from local farm to the table, (as well as a phosphate free fertiliser as a bi product of the energy centre).

1.6 A new community farm with market garden is proposed, supplying veg boxes to low income residents. Allotments and community gardens, orchards and a 'food forest' will be woven through the development. The neighbourhood centres will cater for regular farmers markets and pop ups.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 17. Do you have any comments on the mineral and waste policies?

STRATEGIC POLICY S17 – SUSTAINABLE WASTE MANAGEMENT

1.1 Our clients are of the view that sustainable waste management ought to be promoted and they are supportive of the requirements. However, it ought to be noted that waste is not limited to commercial and household waste, some of which is not currently suitable for standard recycling processes. Rather there is a significant amount of agricultural waste across the Authority. There should be innovative means of dealing with this, for instance our clients proposed Anaerobic Digestion plant will take farm waste from across their landholding and the wider County to generate gas. The bi product will provide a phosphate and nitrate free fertiliser that can be used on local farms and has the potential to remove a major source of pollution (phosphates) from the local eco system and river catchments.

1.2 In addition, our clients proposed waste to energy gasification plant, which will use predominantly waste plastics (that cannot be recycled) along with some biomass to convert waste into a bio-gas. Such a facility could be located within the employment area alongside and indiscernible from other small factory type units with limited impact. In the case of our clients' proposal, the gasification plants would be converted at localised energy centres into heat and power. The heat will feed into a District Heating System in the village centre to support community facilities and higher density accommodation for the elderly and vulnerable whilst surplus can be converted to electricity to feed into the grid or directly to nearby homes.

1.3 Such a sustainable, net carbon zero approach to energy needs (including in respect of charging points for cars, bikes and shuttle buses) provides a unique opportunity for the County.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		x
Fails Test 3: Will the Plan deliver (is it likely to be effective)?		x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

Question 3 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE



SEPTEMBER 2024

soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone: - 033 00 13 00 12
e-mail: - enquiry@soltysbrewster.co.uk
Web Site: - www.soltysbrewster.com

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE

DOCUMENT REF: E24124701/Doc 07 – September 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	17th Sept. 2024	Ben Satherley (Senior Ecologist)	Dr. M Watts (Director)	M. WATTS

ECOLOGY SUMMARY NOTE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

Background

Soltys Brewster Ecology (SBE) were commissioned by Llanarth Estate to undertake an ecological walkover survey of an area of land at Raglan, Monmouthshire (central grid reference: SO404092, see Site Location Plan in Appendix I). The area, which encompasses agricultural farmland with associated hedgerow, treeline and woodland boundaries, has been proposed as a strategic candidate site for residential development as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP) review process. An initial baseline survey was completed at the site by SBE in 2019[1], with an updated Preliminary Ecological Appraisal undertaken again by SBE in 2021[2], following changes to the site's redline boundaries. The results of these surveys are now considered 'out of date' and so in order to establish if there had been any notable changes to site conditions (i.e. type and distribution of habitats), an updated walkover survey was undertaken in August 2024 to inform the current promotion.

2021 Survey Work

The 2021 survey visit (SBE) revealed limited range of habitats at the candidate site, in line with its agricultural use, with conditions largely consistent with the findings of the 2019 survey (see 2021 Extended Phase 1 Habitat Plan in Appendix II). The majority of the site consisted of arable and improved grassland fields which were considered of low ecological importance. Other habitats present included poor semi-improved grassland, plantation woodland, scattered trees and scrub, continuous bracken, hedgerows, ponds, swamp, ditches and buildings – of which hedgerows, ponds and swamp were all identified as Section 7 Priority Habitat under the Environment (Wales) Act 2016.

The habitats present at and directly adjacent to the site were considered likely to support locally foraging/commuting bat species, nesting birds (including ground-nesting birds), Badger *Meles meles* and amphibians, potentially including Great Crested Newt *Triturus cristatus*. The habitats also had limited potential to support Hazel Dormouse *Muscardinus avellanarius* and common reptiles, while the survey identified several trees and buildings at the site with potential to support roosting bats. No invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded at the site.

[1] Soltys Brewster Ecology (SBE) (2019). *Land at Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885901/DOC 02 – 30 July 2019.

[2] Soltys Brewster Ecology (SBE) (2021). *Cwm Pentref, Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885902/DOC 01 – 24 August 2021.

A desk study completed as part of the 2021 Preliminary Ecological Appraisal confirmed that the candidate site does not lie within or adjacent to any internationally or nationally designated sites for nature conservation, and neither can any such site be found within a 1.5km radius. Several locally designated Sites of Importance for Nature Conservation (SINCs) were identified in the local area, none of which would be impacted by the proposal based on their physical separation from the site (the nearest SINC was found approximately 400m to the northwest). The data search did reveal that the candidate site contains one parcel of Ancient Semi-natural Woodland (ASNW) and three parcels of Plantation of an Ancient Woodland Site (PAWS), associated with Chapel Wood and Pentwyn Wood. A copy of the 2021 desk study information received from South East Wales Biodiversity Records Centre (SEWBReC) is included within Appendix III.

2024 Walkover Survey

The updated site walkover survey was undertaken on the 15th of August 2024 by a suitably qualified ecologist[3]. Overall, conditions across the candidate site have remained broadly consistent with what was mapped/recorded in 2021, and as such the 2021 Phase 1 Habitat Map (see Appendix II) is still considered to be representative of the site. Site notes taken during the 2024 walkover survey, along with accompanying photos and an annotated map, are included within Appendix IV.

Habitats

The majority of the candidate site remains occupied by a series of arable or improved grassland (mostly Ryegrass leys grown for hay/silage with some sheep pastures in the west) field parcels which were considered to hold limited ecological value and continue to represent the most suited areas for any future development. Other habitats recorded at and immediately adjacent to the site include parcels of plantation woodland, scattered trees and scrub, hedgerows, ponds, swamp, ditches and buildings – all of which are as described in 2021. These habitats, which are mostly associated with the field boundaries/margins, were considered to represent more important ecological features (in context of the site), with hedgerows, ponds and swamp all still listed as S7 Priority Habitats in Wales. The only notable changes since the 2021 survey visit related to some minor changes in land-use practices/management within several of the agricultural fields – these changes are set out in Table 1 below.

[3] Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of habitat and protected species surveys and previous knowledge of the candidate site.

Table 1 – Changes to land use/management in field parcels

Field No.	Changes to habitat/use
F6	Previously Arable – now sown with improved grassland.
F7	Previously poor semi-improved grassland – appears to have recently been sown with improved grassland (Ryegrass ley grown for hay/silage).
F11	Previously unmanaged/dis-used land parcel covered entirely in continuous Bracken – The field is still unmanaged with the Bracken now being replaced by successional scrub comprising Bramble with young strands of Willow *Salix sp*. and Birch *Betula sp*.
F16	Previously improved grassland – now used as Arable.
F19	Previously improved grassland – now used as Arable.

The various buildings found at across the site (i.e. those associated with Wern-Y-Cwrt Farm in the west, or the barn found in the far east) also remain in similar appearance to what was recorded in 2021, with no notable changes to their current use or condition – see Target Notes 1 & 6 in Appendix IV.

No invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were found at the site during the walkover survey. However, Cherry Laurel was noted within one of the woodland parcels in the northern extent of the site (see Target Note 12). While this species is currently not listed on Schedule 9, it is considered particularly invasive and can spread rapidly in woodland environments if left unmanaged.

Protected Species

As the type and extent of habitats across the site have remained consistent with what was recorded during the 2021 survey visit, so does the site's potential to support protected or priority listed species (as discussed in paragraphs 3.37 – 3.50 of the 2021 PEA report). The parcels of woodland, hedgerows and treelines continue to represent good quality habitat for a range of tree/shrub nesting birds and foraging/commuting bats, with the open fields likely support ground-nesting bird species such as Skylark *Alauda Arvensis* – which were observed at the candidate site during the 2019 survey. Several ponds found at and adjacent to the site were also considered to have a low potential to support Great Crested Newt (with this species known to inhabit the local area), while the habitats were also considered to have low potential of supporting Hazel Dormouse and populations of common reptile.

The updated survey confirmed that all of the trees previously (2021) identified as holding potential to support roosting bats are still present and remain in similar condition. This included 2no. trees with high

potential and 14no. trees with moderate potential. Under the current best practice guidelines[4], any trees assessed to hold moderate/high potential (PRF-M) would require further survey work if these were to be felled, as outlined in section 5.4 of the 2021 PEA report. A disused barn within Field 5 was assessed to have a low potential to support roosting bats and so would also require further survey work (for roosting bats) if this was to be demolished or converted/refurbished as part of the development (as outlined in section 5.4 of the 2021 PEA report).

[redacted]

[4] Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition). Bat Conservation Trust, London

[5] Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*: Developing Best Practice in Survey and Reporting. IEEM, Winchester.

Table 3 – Disturbance risks and protection zones for Barn Owl, adapted from Shawyer (2011).

Activity Type	Example	Disturbance risk (displacement from nest)	Min protection zone	Disturbance risk (displacement from nest)	Min protection zone
		Continuous activity		*Occasional activity*	
Pedestrian Movement	Construction workers walking near nest	Low/Medium	20 m	Low	10 m
Artificial lighting	Arc lights illuminating works but (not directed toward the nest)	Low/Medium	30 m	Low	20 m
Vehicular movement	Vehicles or heavy plant moving past the nest	Medium	40 m	Low	30 m
General building and landscape works	Laying of concrete, bricks, roofing using mechanised plant	Medium/High	60 m	Medium	40 m
Heavy construction works	Ground levelling, piledriving, concrete crushing etc. using heavy plant	High	175 m	High	150 m

Conclusions & Recommendations

As conditions at the site have remained largely unchanged, many of the conclusions and recommendations set out in the 2021 Preliminary Ecological Appraisal also continue to remain appropriate for any future development at the candidate site. In order to inform a planning submission, further survey work may be required for bats, Great Crested Newt and Hazel Dormice (dependant on any future site layout plans). There are also several precautionary measures that would also be appropriate during the clearance/construction/operational phases of any future development in order to safeguard wildlife and other features of ecological value at the site. As previously mentioned, hedgerows, ponds and swamp are all listed as S7 priority habitats, and so any loss of these habitats would therefore require some compensation measures, which could entail new habitat provision or the positive management of retained areas of vegetation.

[redacted]

[redacted]ield parcels 3 and 4, as well as the northern extent of field parcel 2, in the eastern extent of the site could be excluded from any future development, with these areas left as open grassland as part of the site's POS or Green Infrastructure (GI) network. These fields could be left as a 'mitigation zone/biodiversity protection area' and enhanced with the arable crops replaced with a species-rich wildflower meadow mix in order to provide habitat resources for a wide range of wildlife. Doing so would also contribute to the scheme achieving a net gain in biodiversity units.

Therefore in accordance with the current LDP and Planning Policy Wales (PPW 12), any development at the candidate site will need to adhere to the avoidance, mitigation and compensation hierarchy. Appropriate avoidance, mitigation and enhancements measures for the site (as set out in the 2021 PEA) are summarised below:

Avoidance

- Any future vegetation clearance at the candidate site i.e. tree/scrub removal to be undertaken outside of the nesting bird season (clearance possible between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.
- Retention of the site's boundary features and field margins as part of the site's Green Infrastructure (GI) network.
- Retention and protection of all Ancient Semi-natural Woodland (ASNW) and Plantation of Ancient Woodland Sites (PAWS) with appropriate buffers separating these from development.
- Retention of any S7 priority listed habitats (i.e. ponds, swamp and boundary hedgerows) as far as practical.
- Retention of any trees considered suitable of supporting roosting bats.
- [redacted]

Mitigation

- Any loss of S7 priority listed habitats to be compensated for through a combination of compensatory measures which could include new species-rich grassland/hedgerow/scrub

planting, new pond creation and retaining parcels of grassland around the site with these managed as wildflower meadows to maintain resources for pollinators/invertebrates.

- Appropriate mitigation for the loss of ground-nesting bird habitat at the site – e.g. retention of field parcels at or adjacent to the site as arable/open grassland, with 'Skylark plots' provided in these fields. [redacted]
- Design of site lighting to minimise artificial light spill onto boundary features and woodland parcels to limit impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 0.5 lux.
- Covering of any excavations overnight or means of escape provided during the construction phase to minimise risks to any wildlife that may become trapped.
- Dependant on likely impacts of any future development layout (e.g. requirement for hedgerow or woodland breaches/loss), further survey work to be completed for bats (transects and automated surveys), Hazel Dormice and Great Crested Newt to inform specific licensing and mitigation requirements with regards to the proposed development layout.
- Precautionary approach to any clearance of fringe vegetation/hedgerows at the candidate site to safeguard reptiles and common amphibians.
- Creation of 130mm x 130mm gaps at the bottom of any garden/boundary fencing to allow continued connectivity through the candidate site for Hedgehog and other small mammals[6].

Enhancement

- Eradication of Cherry Laurel from the woodland parcels.
- Strengthening of any defunct hedgerow boundaries and/or damaged hedgerow sections with new native scrub/tree planting.
- Provision of bat/bird/insect boxes on retained trees and new buildings.
- Provision of rock/log piles along retained boundary hedgerows and woodland edges for use by common herpetofauna.
- Provision of hedgehog houses/homes within retained woodland parcels.
- Design of any SuDS features to benefit biodiversity.
- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity.

[6] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

- Implement management plan for retained and newly created habitats to maintain and enhance their value to local biodiversity.

APPENDIX I SITE LOCATION PLAN

LAND PROMOTION AGREEMENT MAY 2021

North

SCALE 1:6000 @ A3

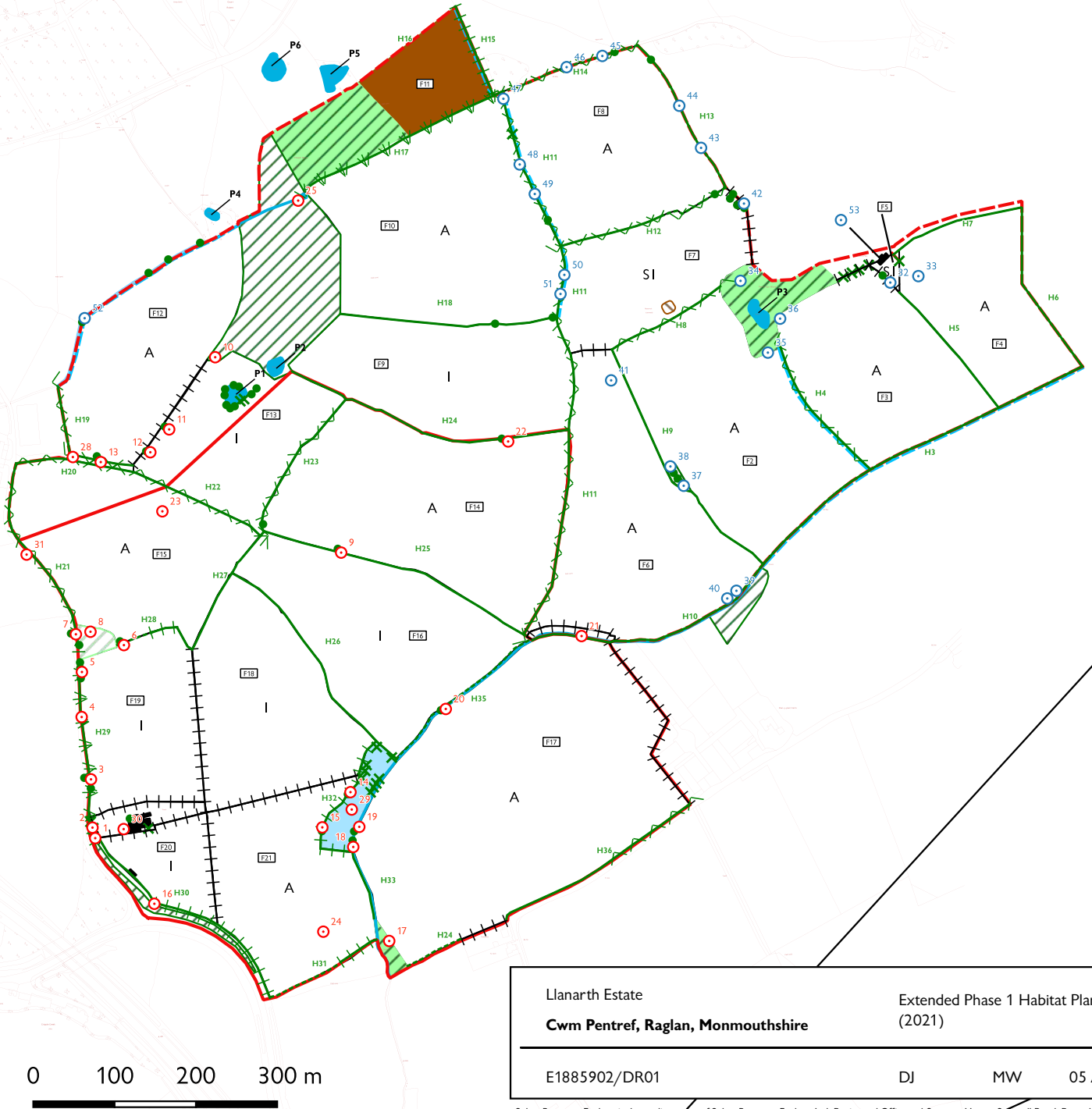
100 m 0 600 m
1: 6,000

PROMOTERS LAND

FIRST OWNERS LAND

SECOND OWNERS LAND

APPENDIX II 2021 EXTENDED PHASE 1 HABITAT PLAN



Key

- Site Boundary/ Survey Area 2019
- Site Boundary/ Survey Area 2021
- A1.1.2 Broad-leaved Plantation Woodland
- A1.2.2 Coniferous Plantation Woodland
- A1.3.2 Mixed Plantation Woodland
- A2.1 Dense/Continuous Scrub
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- B4 Improved Grassland
- B6 Poor Semi-improved Grassland
- C1.1 Continuous Bracken
- C3.1 Tall Ruderal
- F1 Swamp
- F2.1 Marginal Vegetation
- G1 Standing Water
- G2 Running Water
- J1.1 Arable
- J2.1.1 Intact Species-rich Hedgerow
- J2.2.1 Defunct Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- J2.4 Fence
- J2.5 Wall
- J2.6 Dry-ditch
- J3.6 Buildings
- Target Notes 2019
- Target Notes 2021

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Llanarth Estate

Cwm Pentref, Raglan, Monmouthshire

Extended Phase 1 Habitat Plan (2021)

E1885902/DR01 DJ MW 05 August 2021

soltysbrewster ECOLOGY

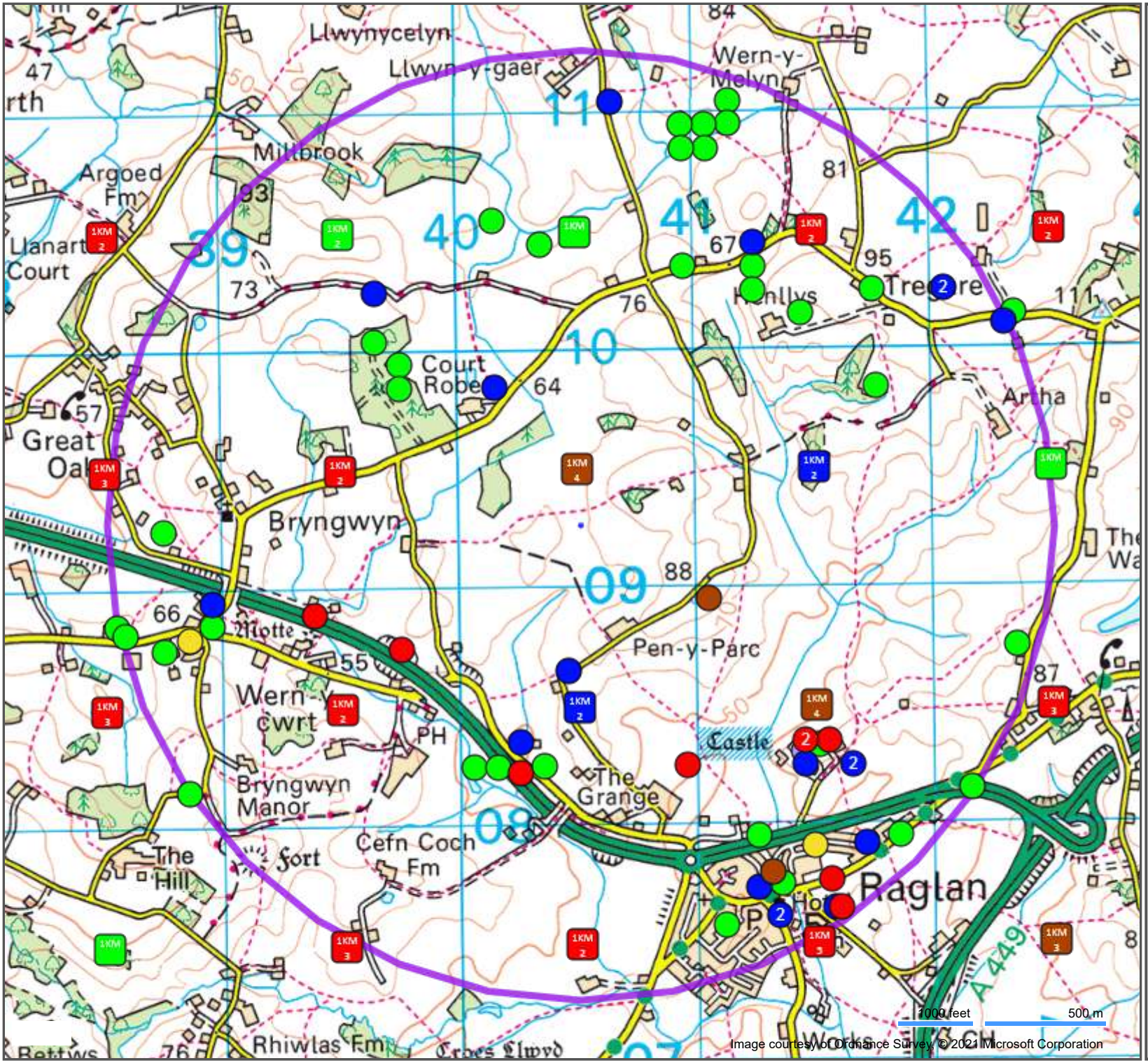
4 Stangate House
Stanwell Road
Penarth
Vale of Glamorgan
CF64 2AA

Tel: 033 00 13 00 12

Email: enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX III DESK STUDY INFORMATION RECEIVED FROM SEWBREC (2021)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CofnodionAmgylcheddol Lleol CYMRU

eMapper for LERC Wales Aderyn Commercial

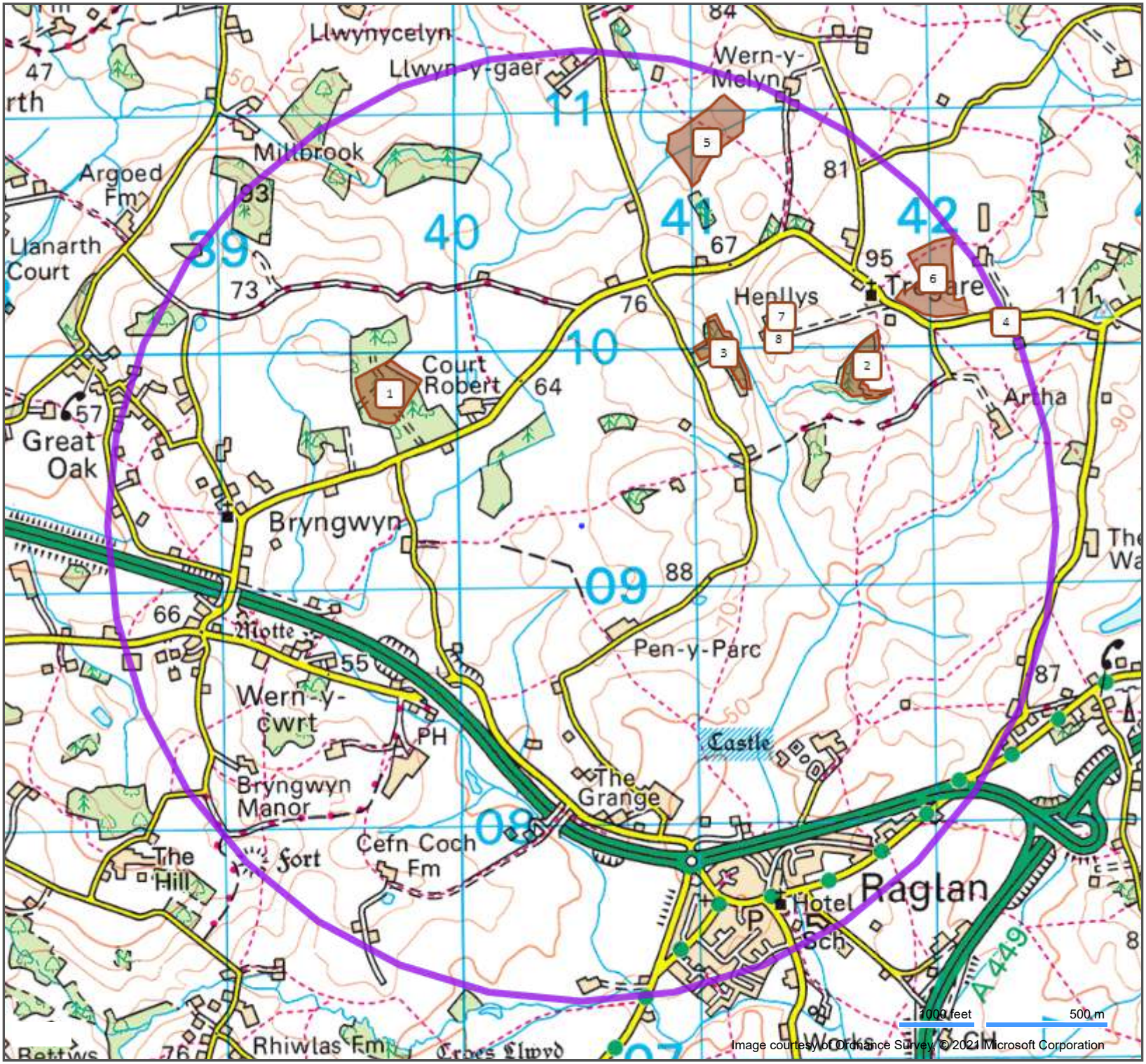
ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf Species Map (Public)

Key

- Search Location
- Search Buffer (2000m)

- **Bees, Wasps, Ants and Sawflies**
- **Birds**
- **Butterflies and Moths**
- **Mammals**
- **Other Invertebrates**
- **Plants**
- **Reptiles and Amphibians**



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDONIAMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

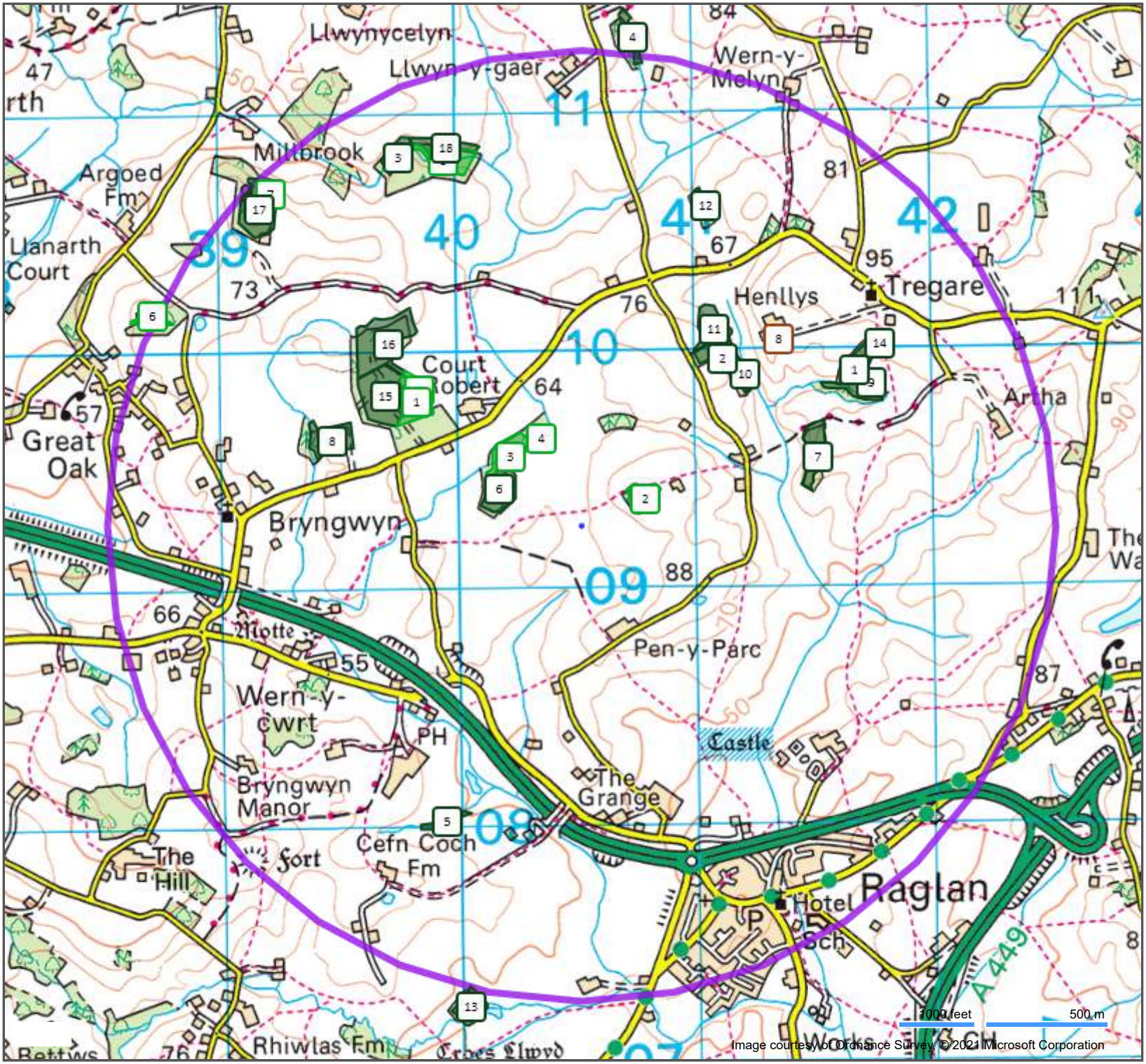
Cwm Pentraf Sites Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Adopted SINC

1. **1**: Coed Robert
2. **2**: Fforest Coed
3. **3**: Henllys Wood
4. **4**: Pen-Y-Walk Meadow
5. **5**: Wern Mellin
6. **6**: Parc-Y-Dert
7. **7**: Henllys Farm (Garden Orchard)
8. **8**: Henllys Farm (Main Orchard)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDIDIN AMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf ASNW Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Ancient Semi-natural Woodland

- **1**: Ancient Semi Natural Woodland
- **2**: Ancient Semi Natural Woodland
- **3**: Ancient Semi Natural Woodland
- **4**: Ancient Semi Natural Woodland
- **5**: Ancient Semi Natural Woodland
- **6**: Ancient Semi Natural Woodland
- **7**: Ancient Semi Natural Woodland
- **8**: Ancient Semi Natural Woodland
- **9**: Ancient Semi Natural Woodland
- **10**: Ancient Semi Natural Woodland
- **11**: Ancient Semi Natural Woodland
- **12**: Ancient Semi Natural Woodland
- **13**: Ancient Semi Natural Woodland
- **14**: Ancient Semi Natural Woodland
- **15**: Restored Ancient Woodland Site
- **16**: Restored Ancient Woodland Site
- **17**: Restored Ancient Woodland Site
- **18**: Restored Ancient Woodland Site

Plantation on Ancient Woodland Site

- **1**: Plantation on Ancient Woodland Site
- **2**: Plantation on Ancient Woodland Site
- **3**: Plantation on Ancient Woodland Site
- **4**: Plantation on Ancient Woodland Site
- **5**: Plantation on Ancient Woodland Site
- **6**: Plantation on Ancient Woodland Site
- **7**: Plantation on Ancient Woodland Site
- **8**: Plantation on Ancient Woodland Site

Adopted SINC

- **8**: Henllys Farm (Main Orchard)

APPENDIX IV 2024 SITE NOTES & ANNOTATED PLAN

Target Note	Description/Comment
***Birds seen/ heard**: House Sparrow Passer domesticus, Buzzard Buteo buteo, Barn Owl Tyto alba, Tawny Owl Strix Aluco, Great Tit Parus major, Pheasant Phasianus Colchicus, Red Kite Milvus milvus, Swallow Hirundo rustica, Herring Gull Larus Argentatus, Wood Pigeon Columba Palumbus, Carrion Crow Corvus Corone, Collared Dove Streptopelia decaocto and Wren Troglodytes troglodytes.* ***Other:** Roe Deer Capreolus capreolus and Speckled Wood Pararge aegeria & Large White Pieris brassicae butterflies.*	
Habitats	
1	Renevated bungalow at Wern-Y-Cwrt Farm. Building is in good condition with new roof and render – negligible roosting potental (previous TN30 in 2021 PEA report). Adjacent barn also considered unsuitable for roosting bats (no obvious features and very open/exposed inside), although Swallow are nesting within this structure. 
2	Area previously mapped as a swamp, surrounded by lines of broadleaved trees, hedgerows and dense scrub (previous TN29 in 2021 PEA report). This was found to be dry at the time of the current survey and contained ruderal species such as Hemlock Water-dropwort *Oenanthe crocata*, Common Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium* and Cow Parsnip *Anthriscus sylvestris*. Hedge Bindweed *Calystegia sepium* is also widespread. Several of the mature trees bordering this swamp have potential to support roosting bats.

	
3	Tree with roosting bat potential (see Target Note 20 in 2021 PEA). This tree was previously considered to hold moderate potential although its condition has since deteriated and now contains more potential roosting features. Now considered to hold high roosting potential (PRF-M). 
4	Tree with roosting bat potential (moderate potential/PRF-M – see Target Note 21 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above and landing within this tree during the current survey.

	
5	Tree with roosting bat potential (low potential/PRF-I – see Target Note 37 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above above and landing within this tree during the current survey. 
6	Dis-used barn found in Field Parcel 5 in eastern extent of the site (previous TN53 in 2021 PEA). The barn contains a Barn Owl box, which at the time of the 2021 survey visit, was occupied by Little Owl *Athene Noctua*. [redacted]  



7

[redacted]









8	Large pond found within parcel of plantation woodland ([redacted]. Pond is approx. 500m² in size and is heavily shaded by adjacent and overhanging trees including Willow, Elder *Sambucus nigra*, Oak *Quercus sp.*, Wych Elm *Ulmus glabra*, Sweet Chestnut *Castanea sativa,* Hawthorn *Crataegus monogyna* and unidentified pines. The banks of the pond are shallow and muddy, with sections densely vegetated by Bramble *Rubus fruticosus* scrub. No emergent vegetation noted, with the surface of the pond covered entirely by Duckweed *Lemna minor.* 
9	Pond found in parcel of plantation woodland immediately north of the candidate site (see Pond 5 in 2021 PEA). This pond was previously noted as being large in size (approx. 500-700m²) although was almost dry at the time of the current survey, with approx. 25m² of open water left. The pond is entirely shaded by the adjacent woodland and is choked by leaf litter and woody debris. Remaining water appears turbid. No aquatic or emergent vegetation noted. Banks are shallow and muddy and support mostly young Willow. 
10	Pond found in agricultural field parcel immediately north of the candidate site (see Pond 6 in 2021 PEA). This pond was completely dry at the time of the survey, with its basin entirely covered by ruderal vegetation. Species present indicate that the pond is still likely to hold water for at least part of the year and include Redshank *Persicaria maculosa*, Common Nettle, Fig-leaved Goosefoot *Chenopodium ficifolium*, Pale Persicaria *Persicaria lapathifolia*, Bittersweet *Solanum dulcamara* and American Willowherb *Epilobium ciliatum*. This pond was almost dried-out during the 2021 survey visit.

	
11	Pond found within small woodland parcel immediately north of candidate site boundary (see Pond 4 in 2021 PEA). This was found to be dry during the current survey although in 2021 was noted to be approx. 200-225m2 in size, with turbid water and large amounts of leaf litter. Yellow Iris *Iris pseudacorus* is still present around the pond's location, indicating it still holds water for at least part of the year. The pond is entirely shaded from the surrounding woodland, with shallow muddy banks that support dense Bramble scrub. 
12	Several well-worn mammal pathways and foraging signs were found throughout parcel of plantation woodland in northern extent of the site – these were indicative of Badger, with no evidence found to indicate they were instead made by other small mammals such as Rabbit *Oryctolagus cuniculus*. No setts were found in this woodland during the current survey. Cherry Laurel spreading in this wood.
13	Pond found on edge of plantation woodland in northern extent of the site (see Pond 2 in 2021 PEA). This pond has reduced in size since the 2021 survey visit, and now covers an area of approx. 100m^2. The pond is heavily shaded by surrounding Oaks and subsequently contains large amounts of leaf litter. No aquatic or emergent vegetation noted during current survey, although Yellow Iris and Water-Starwort *Callitriche sp*. were noted here in 2021. Water appears to be poor quality/turbid.

	
14	Pond in centre of field parcel 13 (see Pond 1 in 2021 PEA). This was completely dry at the time of the survey although in 2021 was noted as being approx. 400m² in size. The pond is partially shaded by Willow and Poplar *Populus sp*. scrub. Limited aquatic/emergent vegetation present, with bankside marginal vegetation comprising of Hemlock Water-dropwort, Soft Rush *Juncus effusus*, Common Spike-rush *Eleocharis palustris* and Trifid Bur-marigold *Bidens tripartite*. 2021 survey visit noted evidence to suggest major waterfowl impact. 
15	Tree with high roosting potential (PRF-M – see TN11 in 2021 PEA). Tree contains a bird of prey nest box. No evidence of use found during current survey e.g. feathers, droppings, pellets.

	
16	Tree with high roosting potential (PRF-M – see TN12 in 2021 PEA). A Tawny Owl emerged from this tree during the 2021 survey visit. Tawny Owl may still be nesting within this tree, with feathers found at the base of the tree and splashing/droppings noted along one of the main branches.  
17	Rabbit warren in small woodland copse.


Satellite Imagery © Google 2024

2954

Sero

Archived: 14 March 2025 16:20:04
From: [redacted]
Sent: Mon, 16 Dec 2024 08:32:13
To: MCC - PlanningPolicy
Subject: Deposit Plan Representations
Importance: High
Sensitivity: None
Attachments:
Representation Form with sheets.pdf; E24124701 - Cwm Pentref Raglan - 2024 Ecology Note_compressed.pdf;

Dear Policy Team,

On behalf of Llanarth Estate, adjoining landowners, Tirion Homes, Candleston Homes, Melin Homes and Sero Homes (together with Sero Energy and perspective commercial partners) we are please to attach our representations.

Our clients have varying interests in ensuring a robust approach to land use planning is taken. It is of utmost importance to ensure that the evidence base underlies appropriate planning interventions in order to address the problems that exist within the County and to create more sustainable and equitable communities that positively respond to the challenges that are faced.

Our clients have previously submitted proposals for a new settlement, Cwm Pentref, at the heart of the county. They have submitted significant background work demonstrating how it could be delivered and the benefits that it could bring. Our clients note the position of the Authority with regards to the level of growth proposed and that LDP's cannot allocate new settlements. Notwithstanding that, given the issues involved, they are keen to ensure that it is clear that their proposal is still a viable and deliverable option albeit for allocation in the SDP.

Our clients include land owners and farming businesses within the central areas of the County that are now more concerned than ever for the future of the rural way of life in the heartlands of Monmouthshire. They are experiencing first hand many of the challenges identified within the various evidence base documents that have been prepared for LDP review over recent years highlighting the factors impacting upon rural communities across the County. These issues include a lack of local workforce and reliance upon workers commuting in due to the unaffordability of local housing, reliance on supply chains outside of the local area, the lack of community and support services, breakdowns and inadequacies in the provision of infrastructure, the increasing cost of land management, time and expense of compliance with increased legislation, the low market prices for produce compared with cheap imports, and the need for direct sales and traceability of food (farm to table). These are all worsening as the LDP review process becomes more prolonged due to inter alia the ongoing impacts of Brexit and the combined effects of the Cost of Living Crisis, inflationary pressures and energy crisis. A continued lack of robust strategy for dealing with these matters will only worsen the sustainability of rural communities. Indeed, this would be disastrous for the County in leading towards even higher house prices, continued lack of range and choice and more restricted demographics where local people have no choice but to leave, particularly the young.

Our clients' previous representations indicate that they believe a step change is required if the County's needs are to be met and if the key challenges facing the Authority are to be addressed. In order to meet these needs and challenges, their proposals for a sustainable new settlement of the County based on zero carbon, 50% affordable housing and best practice where possible demonstrate that there remains a positive planning intervention that can be made. There is no change in the evidence base that would suggest anything other than

such an approach being required. The implications of the Deposit Plan maintaining the status quo and continuing previous trends (lack of affordability, ageing population, out commuting etc) mean that the current situation will be exacerbated and the subsequent review of the Plan will prove even more challenging.

Our clients believe that with regards to the distribution of future growth, just adding incrementally to existing settlements alone will not address the key issues faced, the lack of supply, infrastructure constraints or delivery; nor will it provide a genuine opportunity to plan for the future needs and aspirations of the County on a long term basis including new work/life practices and a shift towards healthier more active lifestyles. Similarly, a large commuter extension at Caldicott will reinforce existing patterns of growth and outmigration.

Rather, our clients remain supportive of an appropriate level of growth led by the provision of a new settlement with complimentary growth across the remainder of the Authority and still believe that it is unsound and inappropriate to remove a positive planning intervention that has the potential to deliver significant benefits. Indeed, such an approach can positively address the Well Being of Future Generations Act and create a vibrant and active community with a wide range of land uses and activities – supporting the surrounding rural area as well as stimulating and encouraging growth. Our view is only strengthened by the impacts of Covid 19 and the move towards sustainable living in local communities and working from home.

As we have stated previously, our clients do not believe that the Authority should simply accept growth at any cost. Indeed, our clients believe that a new settlement in the right location would provide an appropriate long term opportunity to move away from existing problems, constraints and issues. It could provide a step change in the approach to the future well being of the County over the current, and future, plan period. It can also provide a Europe leading approach to best practice in the delivery of communities and places. A new settlement planned with sustainability at its heart provides an opportunity to respond to the unique circumstances in Monmouthshire to set an agenda for a new, modern and sustainable way of living appropriate to its location whilst benefitting surrounding settlements. As demonstrated in our clients' supporting evidence, this sets out the aspiration to provide 50% affordable housing, allowing new residents to fill local jobs in the agricultural, care, catering and tourism industries and a major leap towards net carbon zero – it can provide the step change that the County requires which would lead the development industry nationally.

We note that adopting a lower growth scenario favoured by the Welsh Government means that the key issues can't be addressed and it will be inevitable that a new settlement (or equivalent step change) will need to be considered in a future Strategic Development Plan (SDP) in order to address the problems identified and exacerbated. Indeed, we believe that it should be eminently feasible for an LDP to "dovetail" with an SDP, and such an approach can provide the most sustainable way forward and ought to be achievable in a multi-tiered development plan process.

We recognise that the Local Authority is constrained with regard to the ability to allocate a new sustainable community, however, our clients would like to emphasise the fact that their proposal remains a viable option for the SDP in due course. I note that more recent ecological work has been undertaken on the site and I also attach this for your records.

Our answers to the questions posed in the consultation are set out within the attached and our response is based on a provision of options that will respond to the updated LDP objectives, the Welsh Government's placemaking objectives and Well Being goals.

Our clients are more than happy to meet with the team as in due course if you would like to discuss any aspects of the proposal.

Kind regards

[redacted]



[redacted]

[redacted]

www.lrmplanning.com

22 Cathedral Road, Cardiff, CF11 9LJ

REGISTERED ADDRESS: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ
DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:		[redacted]
Name:		[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	Llanarth Estates, Melin Homes, Tirion Homes, Candleston and Sero	LRM Planning
Address:		[redacted]
Telephone No:		[redacted]

Email:		[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 1: Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 In overall terms our clients welcome the generally positive approach that the Council has sought to take since the beginning of the RLDP process back in 2018, it is however, disappointing that the necessary policy interventions have not carried through to the deposit version of the Plan and are not available for the Authority to make.

1.2 Our clients consider that the overarching aims of the Plan are unobjectionable and in line with the evidence and Planning Policy Wales. Our clients' fundamental concerns however, relate to the level of disconnect between the evidence base, the issues faced and the artificially constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives. This is a fundamental concern as it fails the tests of soundness as it cannot be considered appropriate as the evidence does not support the approach taken.

1.3 A failure to provide sufficient housing to meet the current and future needs in terms of scale and affordability will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. Monmouthshire is already one of the most unaffordable places for people to live and it has a higher proportion of outright owned larger family homes than in surrounding authority areas. Levels of need for elderly care and support are increasing and there is a lack of locally available care provision available to meet increasing need. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

1.4 We also raise concerns over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan alternatively the period for this plan should be extended to 2038 with additional allocations identified.

KEY ISSUES AND CHALLENGES

1.5 There is no question that Monmouthshire faces a number of significant challenges over the course of the RLDP review period and beyond. Particular areas of concern being affordability and the demographic trend towards an ageing population. These problems (amongst others) are firmly established within the various pieces of evidence that the Council and other bodies have produced over the period since 2018. In terms of Affordability the latest Local Housing Market Assessment Refresh (2022 to 2037) indicates that during the period 2022 to 2033 there is in fact a need for 3,035 affordable homes alone yet only a fraction of this number can be achieved through the approach taken in the RDLP depending upon lead in times for development and viability.

1.6 There can be little doubt that these problems have been caused and worsened by under-delivery of new homes in previous development plan periods and will require a step change in policy approach if they are to be addressed now. Indeed, the original Preferred Strategy (2021) supported a level of growth that genuinely sought to reflect the evidence base and provided strong policy intervention to seek to rebalance the demographic profile of the County and address affordability.

1.7 It is deeply disappointing that this was subject to objection by the Welsh Government and we believe that this ought to be noted as a key challenge faced by the Authority as any policy limitations in respect of addressing need in the County will have major implications on residents. Indeed, Future Wales was not subject to the scrutiny of an independent examination, it does not set growth levels and did not analyse the impacts of policy scenarios upon each Authority in the same way that had been diligently done by the Council at the onset of the RLDP process.

1.8 We would question whether the assumptions behind Future Wales are now out of date and in need of review themselves. For instance, the evidence base for Future Wales recognises that the broad housing figures that are suggested therein are based on past building rates which themselves are constrained due to the previous under delivery of housing. Notwithstanding this, it is extremely concerning that the evidence for Future Wales suggests that in the 5 year period 2019/20 to 2023/24 there was a requirement across South East Wales for 21,790 new dwellings. However, based on Welsh Government monitoring statistics there have been just 14,956 completions (StatsWales "New Dwellings completed by period and tenure") across the region. A total deficit of over 6,834 new homes. This is a significant concern given the wide ranging social and economic problems that this will inevitably cause from constraining household formation, increasing house prices, repressing economic growth and activity.

1.9 We also note that there are significant challenges facing rural businesses and communities including in respect of agriculture, forestry, tourism and care. These sectors have been particularly hard hit by trends that are impacting upon the supply of workers. Indeed, our clients are strongly of the view that greater consideration must be given to the rural economy and workforce generally and specifically the lack of affordable accommodation for those workers and a range and choice of housing for residents wishing to downsize within or close to their local communities, so they do not need to be displaced from the support structure they require. For instance, there is significant concern that many farms and/or agricultural units are becoming unviable and there is little being actively done to discourage them from diversifying or being lost;

1.10 Without a positive approach towards the future of the Authority it is inevitable that a number of those problems will be exacerbated further locally. Indeed, we welcome the previous attempts at the Council to achieve such a step change but we are fundamentally concerned that the lower rates of growth now sought will further exacerbate these problems, these are of course scenarios that the Council considered in early evidence base documents and we will consider those in our submissions.

RLDP VISION

1.11 We are broadly supportive of the Vision which we note has been scaled back since the previous version of the Plan. However, it is unlikely that it will be realised in just 7 years (assuming adoption in 2026) given the constrained approach being taken which as noted is itself set against a wider backdrop of under-delivery of housing across the South East Wales region.

1.12 We have a number of further comments:

- we would note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are "affordable housing-led";

- we would question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off's) however, this is being restricted;
- our clients are of the view that communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.
- our clients believe that the Vision should include reference to the agricultural core of the County. Given uncertainties surrounding the future of farming and other rural activities (eg quarrying, forestry), lack of affordability and availability of a local workforce, there is a very realistic prospect that agriculture could be substantively gone in the Authority by 2033. Our clients own over 30 farm holdings and over 1500 ha of agricultural land in the centre of the County, each year it is more difficult to sustain such holdings when there is a lack of affordable homes for rural workers at the heart of the Authority. Commuter estates at Caldicot will not provide sustainable local housing to support businesses and residents in the rural heartland where they need it; much of rural Monmouthshire's landscape and character relies heavily on the stewardship of agricultural holdings, and the maintenance of this is time consuming and expensive with the need to pass on skills to future generations together with a wider understanding of the processes and farming methods involved in long term stewardship, protection, and enhancement of some of the County's most attractive attributes. Partnering with a not for profit society will bring forward housing to rent at below market rents ensuring key workers can access suitable accommodation locally; and
- Our clients welcome the inclusion of reference to a zero carbon County in line with Monmouthshire's declaration of a climate emergency and commitment to do all it can to help address the emergency.

RLDP OBJECTIVES

1.13 With regards to the RLDP objectives and comments are set out within the following table.

	OBJECTIVE	COMMENT
1	**Economic Growth / Employment** To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses, including through the provision of start-ups and grow on spaces.	We are supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.
2	**Town and Local Centres** To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor Monmouth and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	In order to support Town centres it is important that a commensurate level of growth is sought.
9	**Demography** To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced	We are concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasicity of supply in the housing market means that affordability

	demography and socially and economically sustainable communities.	will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.
10	**Housing** To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	We support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.
11	**Placemaking** To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	We are supportive of the creation of sustainable places.
13	**Rural Communities** To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	Our clients are strongly of the view that a distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Indeed, it is often the smaller more remote settlements where property supply is limited and prices are highest and our clients consider that proportional growth is therefore appropriate in these locations provided appropriate infrastructure and community facilities exist to ensure the settlement is truly sustainable. However, this should not be at the expense of proposals that seek to address the much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural "way of life" ought to be the objective, as opposed to provision of large estates along the M4 corridor. Furthermore the particular difficulties faced as a result of Brexit and the lack of trade deals means that being self-sufficient and able to produce our own food is of primary importance. This is also of global importance by reducing the number of food miles some goods travel to reach market.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.14 It is noted that given our concerns relating to the evidence base and the strategy of the plan being progressed, the changes that we believe are required relate to more detailed strategy policies for instance, adopting a higher growth strategy that reflects the evidence base and allows the potential for some of the challenges to be addressed.

2.	Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)	
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 2: Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our clients are significantly concerned by the approach taken towards restricting growth in the Local Authority which itself has fallen by up to 30% since the 2021 Preferred Strategy Consultation and does not reflect the evidence.

1.2 Our clients are concerned that the approach taken has been entirely shaped by the Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. Indeed, since we submitted previous representations on the higher growth strategy sought, the wider socio-economic circumstances have changed considerably with inflation, increases in the cost of living, energy prices etc. Adding these to the impacts of Brexit and Covid 19, our clients remain of the view that there must be a duty on every LDP to promote, encourage and foster the highest possible ambitions for achieving sustainable growth. In this regard we still believe that the approach taken to rule out a new settlement does not reflect long term planning aspirations or the specific circumstances of the County.

1.3 We are concerned that there is a significant conflict with Future Wales in the case of Monmouthshire, where the Welsh Government's position blocks a Plan-led intervention that can positively address the issues identified and hinder sustainable placemaking. The challenges facing Monmouthshire are very well acknowledged across existing policy, strategy and research documentation including the research that has shaped the previous iterations of the replacement LDP and the consideration of growth options. Indeed, it is well known that the housing market reinforces these issues and without positive interventions (i.e increasing the supply of new homes of appropriate size and tenure), there will be further worsening of matters such as the sustainability of services, the ageing population, high levels of in- and out- commuting (general lack of sustainability) and affordability. These issues have both economic and housing market implications as well as in respect of society and inequalities putting pressure on social care particularly for the isolated elderly.

1.4 Indeed, it is stated at para 6.1.2 of the Deposit Plan that the:

"RLDP Growth and Spatial Strategy seeks to deliver sustainable and resilient communities by addressing our core issues of:

- ***Housing Affordability - delivering essential affordable homes at pace and scale to meet local needs.***
- ***Rebalancing our Demography- ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.***
- ***Economic Prosperity – supporting and enabling sustainable economic growth."***

1.5 These requirements shape the overall vision and objectives of the plan. However the Plan's own evidence base suggests that these cannot be achieved by a continuation of current low levels of growth and under-delivery of homes. Rather they will be exacerbated.

Monmouthshire RLDP GROWTH AND SPATIAL OPTIONS PAPER December 2020,

1.6 In the Growth and Spatial Options Paper December 2020, a number of growth levels were considered. Whilst, there is no identical level to the current Deposit plan, it does lie in between Options 3 and 4.

1.7 For Option 3 (4770 homes over the plan period plus a 15% flexibility allowance so 5485 in total), the evidence base indicated that this level of growth would result in inter alia:

- ***"An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***An overall decline in the working age population in the County, although there is some growth in the 35-44 age groups, which could fuel some employment growth. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce people will still need to leave the County to access employment, this will not promote sustainable travel to work patterns. Provides limited opportunity to create a thriving, well connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure affordable housing but at this lower level would not address this key issue. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.8 Option 4 considered a higher level of growth than proposed in the Plan currently and it was concluded that at 6030 homes during the plan period (plus an additional 15% flexibility allowance (so 6,935 in total), the following impacts would still exist:

- ***'Despite a small uplift in the younger age groups, results in an increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.***
- ***Growth in established households around the 35-44 age group, which could fuel some employment growth. However, the overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that people will still need to leave the County to access employment. This would not significantly reduce levels of out-commuting or promote sustainable travel to work patterns.***
- ***Whilst this option projects growth in jobs over the Plan period, it is unlikely that this level of job growth located within the County will be needed given the increased propensity to work from home / remotely. It is expected that the trend for increased home and remote working will continue over the longer term which will act to reduce this job growth figure over the Plan period."***

1.9 The findings of the assessment in respect of restricted levels of growth with limited policy intervention clearly sign posted the Authority towards higher levels of growth that can seek to deal with the issues identified in the Plan. Indeed, the Council's favoured option (at that time) would have resulted in:

- "***This option shows significant progress in achieving a more balanced demographic, although the increase in the number of older and elderly people living in the County would still impact upon the type of housing required and service providers across public and private sectors. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.***
- ***Growth in the number of working aged people living in Monmouthshire, with a notable increase in established households around the 30-44 age group, fuelling growth in employment provision. A reduction in out-commuting likely to lead to more sustainable travel patterns. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic.***
- ***Opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire."***

1.10 It is informative to note that in the 2022 update of the Growth and Spatial Options Paper, this option is still considered the best fit, it is stated that:

- ***"Growth Option 1 is identified as best performing against ISA (integrated Sustainability Assessment) themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County."***

SOCIO ECONOMIC CONTEXT

1.11 Hardisty Jones Associates (HJA) are widely experienced economists specialising in development needs and impacts. They were commissioned by our clients to consider the socio-economic context for Monmouthshire, specifically considering the central parts of the Authority which form the rural core. The results of their research reinforce the point that lower growth levels as envisaged would exacerbate the already significant problems experienced in the County and its rural communities and key workers.

Demographics / Age Profile

1.12 HJA note that the age profile of the central rural part of the Authority is largely an exaggerated version of that witnessed throughout Monmouthshire. It can be summarised as aged and ageing, including:

- An older population i.e. a high proportion of residents aged 65+ years, and a high proportion aged 50+ years, with shares in these age groups having increased over the last 10 years;
- A high proportion of retired residents and low proportion of households with dependent children; and
- A decrease in resident population under 50 years since 2010.

1.13 The Growth and Spatial Options Assessment previously undertaken confirms that the level of growth sought will not address these issues compared to the previous level of growth suggests it will. A higher level of growth is required in order to make a step change in this profile.

Housing Stock

1.14 The housing stock in the rural heartlands of the County is characterised by a greater proportion of larger properties. There is relatively low diversity of stock in terms of size, typology and tenure. This provides very limited choice in the market.

1.15 The share of households that own their property or privately rent is much higher than benchmark locations, and the share of homeowners that own their property outright with no mortgage is also much higher. The tenure profile exhibits a much lower share of households in social or private rented accommodation, and a very low proportion falls within affordable tenures.

1.16 A limited growth strategy will exacerbate this trend.

Affordability

1.17 Median house prices in the central part of the County are higher than other benchmark locations. This is at least partly driven by the size profile of the dwelling stock. Lower quartile house prices across the dwelling stock have consistently remained above the Monmouthshire equivalent. Average household incomes are low compared to many parts of Monmouthshire.

1.18 Housing affordability is significantly worse in Monmouthshire than Wales overall. The higher house prices and lower incomes data would suggest the local position in the heart of the County is worse than the district wide average. The housing mix is a contributor to this problem with such a high proportion of large detached and semi-detached properties and relatively few smaller properties and affordable tenures.

1.19 Housing affordability is without doubt a significant issue in Monmouthshire that must form a central component of any strategy. Accessing housing in rural areas is a challenge that extends beyond Monmouthshire, however, the County is the least affordable of all rural areas in Wales. The Local Housing Market Assessment has identified huge affordable housing need, way beyond what is deemed 'reasonable' to deliver via the Revised Local Development Plan.

1.20 Alongside the fact that policy would be unable to tackle the full extent of the challenge, sits the delivery challenge. Levels of development of both market and affordable housing over the current LDP period have fallen below targets (for a range of reasons including viability and technical constraints). In part this contributes to current need. In order to deliver the identified housing requirement and achieve ambitions around addressing the ageing demographic profile and reducing commuting levels, there is a need for an alternative level of growth which is higher than previously assessed.

Economy

1.21 Economic activity rates are generally high and would be very high if not for a substantial proportion of early retirees in the area. However, the area has experienced relatively weak employment growth, with declines in the local area prior to the Covid 19 pandemic. This is set against rising employment across wider benchmark locations and the current cost of living crisis and economic recession in the UK.

1.22 A restricted growth scenario (that retains the overall imbalanced age profile) is not going to address the fundamental problems.

1.23 From an economic perspective there is ambition to see a thriving and diverse economy. This will need to build on both inward investment and innovative, competitive indigenous businesses. This will certainly need to include developing existing rural based strengths and key sectors including tourism and leisure, food and drink and agri-tech as well as manufacturing, technology and digital activities. Farm practices will need to be future proofed to ensure they survive and the County continues its role as an important source of local produce. It needs to ensure the agricultural base is supported with key workers based locally and trained, with agriculture being recognised as an important industry essential to the health and wellbeing of local people. This is an approach advocated by the Welsh Government in their “Food for Wales, Food From Wales” document on local food production. None of these challenges can be met absent a robust and sustainable approach to planning interventions.

Commuting

1.24 There are large commuting flows both in and out of the County and the local area. Generally, essential workers (including key workers) commute into the Authority to take on important roles with more affluent workers commuting out of the Authority to urban centres such as Bristol, Cardiff and Newport. These levels have stayed broadly constant, or possibly increased, over the last 10 years despite policy ambitions to reduce these flows. The removal of tolls on the Severn crossings increased these figures as commuting costs have reduced.

1.25 These are clearly not the characteristics of a sustainable and equal place and addressing these challenges must be a key requirement of any Plan if the Council's obligations under the Well Being of Future Generations Act are to be met. Adopting a level of growth as is being suggested by Future Wales is in clear conflict with the evidence base which can only worsen this situation.

1.26 It is fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own entirely different but equally challenging issues that need to be addressed. It isn't possible to consider the whole of SE Wales as one when focusing on deprivation in previously industrial areas will not maintain the food producing heartland of the east of the region.

MEETING NEEDS

1.27 PPW12 is very clear in respect of the process that an Authority must undertake in order to arrive at its housing requirement. Indeed, paragraph 4.2.5 states that housing requirements ***"must be based on evidence"*** and para 4.2.6 indicates that evidence includes ***"issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities***." Para 4.2.7 goes on to indicate that ***"Planning authorities need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, to identify alternative options."***

1.28 The implications of not adopting a strategy that addresses problems in Monmouthshire includes:

- An increase in the proportion of the older and elderly people living in the County, impacting upon the type of housing required and service providers across public and private sectors with very limited opportunities for the younger population to live and work in the County. The pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. An approach based on Future Wales would not address the demographic imbalance in the County.
- Artificially low growth would impact negatively on rural communities by providing limited opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. The pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable. Difficulties in sustaining services and facilities across the County will result in rural isolation.
- Artificially low growth would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services and facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation.
- An overall decline in the working age population in the County. The overall number of jobs is projected to be at a lower level than in the previous 15 years, indicating that whilst the commuting levels will reduce, people will still need to leave the County to access employment. This will not promote sustainable travel to work patterns, and provides limited opportunity to

3. Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 3: Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

1.1 Our response to question 3 is set out in two parts, firstly in respect of the spatial strategy and secondly in respect of the components of the land supply.

SPATIAL STRATEGY

1.2 Our clients strongly object to the current approach towards Spatial Strategy which does not adequately address the key challenges faced by rural communities.

1.3 We remain surprised and disappointed that perhaps the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. As we have previously commented, such an approach provides the step change required in the County. Notwithstanding this, with regards to the other potential components we note Indeed, it is important that the primary settlements are treated with parity in respect of the distribution of development yet it is noted that:

Existing Infrastructure and Constraints

1.4 Many existing settlements (in all tiers and including the Strategic Sites) are subject to numerous constraints (including land assembly, landscape and nature designations such as AONB, SSSI, SAC etc) third party constraints, transport, facilities / services, foul and surface water drainage, phosphates, air quality etc.). It will therefore be vital to ensure that an adequate ownership and infrastructure plan is prepared to ensure that existing constraints are overcome with suitable levels of investment.

Distribution

1.5 Given the significant issues facing the central and northern parts of the Authority, our clients are concerned that 44% of growth is to be directed towards the M4 corridor / Severnside settlements which accommodate around 20% of the population, rather than spreading more evenly across the County in line with the other 80% of the population. This will not enable local needs to be met fully and will not address the key challenges in terms of demographics and affordability. Indeed allocating just 14% of growth to the significant number of Tier 2 and 4 settlements reinforces the existing trend of larger properties that are unaffordable for local people and key workers.

1.6 Similarly, whilst clusters have been identified for Severnside, Chepstow and Abergavenny, the strategy does not recognise the fact that there are a large number of other communities in the northern part of the County that are based around a hierarchy of hub and clusters with service centres serving a wide rural hinterland, around which sustainable patterns of movement and growth occur.

1.7 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key

issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

Sustainable development

1.8 National planning policy is predicated upon the creation of fair, sustainable and equitable communities, with a range of duties, generalised planning principles, and placemaking aims placed on Authorities by the Well Being of Future Generations Act. It is strongly our clients view that ignoring such needs would be contrary to these requirements and rather than addressing the key issues identified in the evidence base, it would have an extremely harmful and damaging impact upon the communities of the area.

1.9 Indeed, Creating and Sustaining communities is one of the Key Planning Principles listed in Figure 4 of PPW, it states that ***"The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives."***

1.10 It is further noted in PPW (para 2.8) that "***Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales….This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle."***

1.11 There are of course many other examples of relevant policy and Welsh Legislation requiring a sustainable approach towards development and meeting needs which we do not repeat here in the interests of brevity. However, it is clear that not addressing problems which will achieve sustainable development by balancing needs and addressing inequalities is contrary to the overarching objectives of the planning system.

CHANGES REQUIRED IN ORDER TO MAKE THE PLAN SOUND

1.12 We are strongly of the view that a new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority.

1.13 It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

SOURCES OF SUPPLY (TABLE 2)

1.14 We have a number of concerns in respect of the components of the land supply as set out in deposit RLDP. These are set out below. Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the approach towards housing land supply is not sound insofar as: following tests of soundness:

- the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- the proposed housing provision strategy does not flow logically from the proposed strategy of the plan nor achieve the objectives and vision of the Plan;
- the housing supply requirements are not realistic and appropriate having considered the evidence; and

- restricting the level of housing (location, range, choice and number) available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faced.

Historic under delivery and reliance upon old sites

1.15 In the first instance we note that the primary source of sites are completions (2,220) associated with the first 6 years of the plan period (ie between 2018/19) and 2023/24), existing commitments provide a further 798 dwellings, these two sources forming nearly half of the land bank (3,018). We have significant concerns over reliance upon historic completions of sites that were intended to contribute towards the previous LDP requirements but didn't. Instead they now form the principle source of sites to contribute towards the RLDP.

1.16 Whilst we acknowledge that the supply calculations will have taken account of the undersupply, unfortunately this will be in terms of reflecting a lower build rate projected forward than for looking to address those shortcomings positively or consider their consequences. Indeed, during the previous plan period between 2011 and 2021 there was a shortfall of 1,500 homes (or 33% of the requirement).

1.17 Such historic under delivery will have had a significant adverse effect on a range of social and economic factors which in turn will further compound the issues that have been identified as challenges faced.

Windfalls

1.18 We would question the appropriateness of including an allowance for the last 4.75 years of the plan. Indeed, by the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward. Indeed, given the timeframes for such a large number of windfall sites, we would expect pre-application enquiries to have been made on such sites by now.

1.19 Notwithstanding that, it is understood that there are very few brownfield site opportunities within the County area. This is emphasised by the fact that only 230 are identified in the Urban Capacity Study and of those most appear to be constrained, of note:

- 21 were refused due to loss of employment land;
- 18 were refused due to phosphates;
- 16 were withdrawn but may be resubmitted; and
- A number of others have alternative uses.

1.20 Given the above, we believe that 230 is highly optimist and suggest that this number is halved such that the total number of large windfall sites would be 115 dwellings.

Trajectory

1.21 We welcome the approach taken towards the trajectory by the Council in general. However, it is noted that if the plan is adopted in 2026 then there will only be around 7 years of the period remaining, this gives a very tight timeframe for delivery of new allocations particularly against the backdrop of the delays with the previous plan whereby a large number of allocations therein are only just being completed.

1.22 It is therefore important to ensure that the trajectories are accurate, otherwise there will be further delay and non delivery and further exacerbation of affordability problems, lack of growth.

Caldicot

1.23 We note the comments of Richborough Estates in the Background Paper, however, not withstanding that we note:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, absent a timeframe for submission of an application, then it is unlikely to be submitted until later in 2026. Importantly, Richborough are not developers so it would most likely need to be an Outline Planning Application followed by a tender and sales process further delaying delivery.
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- As noted, there will then need to be a disposal process to a developer. We anticipate that this could add up to a year , such that RM's for early phases are not in a position to be submitted until 2029 and pre-commencement conditions discharged thereafter; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year.

1.24 Given the above, we note that at least **320 dwellings** that are in the current plan period will be delivered in the next period.

Abergavenny

1.25 We note the comments in the Background Paper, however, not withstanding that we submit that:

- An application will be subject to an Environmental Impact Assessment, this is likely to take up to 6 months to prepare alongside the pre-application process. There would then need to be a PAC undertaken. We consider that given seasonal issues and requirements, (absent a timeframe for submission of an application), it is unlikely to be submitted until later in 2026. Importantly, given the scale of development it would most likely be an Outline Planning Application;
- We consider that based on previous experience, it will take around 12 months to determine an Outline Planning Application. Then there could be a further say 6 months to sign the s106 agreement. This could be towards mid 2028;
- We would then expect that RM's for early phases would not be submitted until early 2029 and pre-commencement conditions discharged subsequently; and
- Given the scale of the site, it is likely that there will be some significant upfront infrastructure requirements and accordingly, we believe that most optimistically first completions would be during the 2030 / 2031 monitoring year. From comments made at the session it would appear that 80 units would be a realistic maximum per annum.

1.26 Given the above, we note that at least **190 dwellings** that are currently in the plan period will be delivered in the next period.

FLEXIBILITY ALLOWANCE

1.27 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified of 20%. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward, the previous LDP having under delivered by 33% and as such it is prudent to plan for a higher buffer. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). The Council note:

"The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered."

1.28 Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.

CONSEQUENCES OF FAILING TO PROVIDE AN ADEQUATE HOUSING SUPPLY

1.29 We have already set out our concerns regarding the level of growth in representations in respect of this which consider that the approach to growth should be more positive. Notwithstanding that, failure to provide a robust land supply to meet that need would exacerbate the existing problems that are already known including

- Undermining economic growth;
- Increasing levels of unaffordability; and
- Reinforcing an ageing population as new households are unable to form.

REQUIRED CHANGE TO MAKE THE PLAN SOUND

1.30 It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 6. Do you have any comments on the climate change and renewable energy policies?

STRATEGIC POLICY S4 – CLIMATE CHANGE

1.1 Our clients support the overarching aims of the policy however, we believe that this ought to be applied to new allocations within the Plan on a site by site basis. Our clients believe that each allocation ought to set out the ways in which it will address the climate emergency with site specific criteria.

POLICY NZ1 – MONMOUTHSHIRE NET ZERO CARBON HOMES

1.2 Our clients are supportive of the approach taken. It is noted that their proposals for a new settlement demonstrate what is achievable, in particular a truly zero carbon community that uses the latest technology to generate and store the energy it needs as well as turn local waste into power and centralised recycling facilities and a pyrolytic plant to turn waste products into energy, reducing the net waste produced. This is possible due to the scale of the proposal and the unconstrained and significant land ownership.

1.3 They propose that bio-gas will be generated from an offsite waste energy plant and anaerobic digester using household and farm waste. The bio-gas will be converted into electricity at localised energy centres to power local transport, community facilities, homes and businesses. Surplus power will be exported to the national grid.

1.4 Phosphate free fertiliser as a bi product of the anaerobic digestor will be available for local farms to protect biodiversity. On plot micro power generation, such as ground and air source, solar and photovoltaic technology will be incorporated as a standard building design element alongside fast charging points, energy storage and high-performance thermal envelope.

POLICY CC1 – SUSTAINABLE DRAINAGE SYSTEMS

1.5 Our clients are supportive of the policy. It is noted that their proposed new settlement provides a nature-based solution which will secure a net biodiversity gain. Benefits will be seen at all scales from window boxes and planters, individual gardens, community allotments and orchards, to interconnecting green corridors, site wide planting and SUDs networks.

1.6 Existing ecological habitats, including woodland and hedgerows, will be retained and enhanced, linking into 125ha of new habitat within green space. New habitats will include meadow creation, wetland, woodland, hedge planting and specimen trees incorporating native plant species.

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 7. Do you have any comments on the green infrastructure, landscape and nature recovery policies?

STRATEGIC POLICY S5 – GREEN INFRASTRUCTURE, LANDSCAPE AND NATURE RECOVERY & POLICY GI1 – GREEN INFRASTRUCTURE

1.1 Our clients are supportive of the approach taken by S5 and GI1. Their proposals for a new settlement demonstrate how green infrastructure, landscape and nature can thrive with innovative solutions, indeed, they propose creating over 125ha of new habitat and green spaces from intensively farmed land. Their approach taken seeks to ensure that their proposed community delivers an open, accessible and engaging environment. Interlinked open spaces will bind each neighbourhood together, increasing opportunities for recreation, helping and strengthen wildlife corridors and allowing people to move freely. Parkland will create a visitor destination in its own right and an important education resource.

1.2 Their proposed landscape strategy is based on six key components:

- The connection of two central but fragmented pieces of woodland. This ecological and recreational resource will be supplemented by a significant new native woodland;
- The creation of a new green spine running north-south through the residential areas, serving as an arterial route, transporting people via public bridleways, footpaths and cycleways through a mosaic of ecologically diverse habitats and connecting two fragmented stream catchments;
- The provision of two new public parks, offering individual amenity experiences at (i) Hilltop Park, with glamping and tourism and (ii) Wetland Park, based on the existing damp grassland area to the south-west;
- Four distinct neighbourhoods, based around community facilities, including communal growing spaces and play areas. These will be connected to a walkable village centre with footpaths and greenways based around existing hedges and field boundaries;
- The creation of a dedicated sports hub; and
- The creation of a patchwork of meadow and woodland, providing amenity-rich landscape, a highly sustainable and healthy wildlife resource and a dynamic rural-to urban interface where the urban environment blends seamlessly with open countryside.

1.3 In addition, and of significance their proposal is based around providing a positive contribution towards dealing with phosphates, and a mitigation strategy that ensures phosphate neutrality for the proposals but will also free up enough “credit” in order to facilitate a minimum of an additional 1,770 dwellings elsewhere in the north of the Authority, if desired. This can be increased to up to 6,000 dwellings through various measures.

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)		
Is your representation in support or objection?	Support:	
	Objection:	x

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 9: Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT10

Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

POLICY S7 AFFORDABLE HOUSING

1.1 Our clients are supportive of the aspiration to provide 50% affordable housing on allocations. In order to meet the known demographic needs of their local area, they have demonstrated on their proposals for a new community that fifty percent (50%) of housing can be affordable, including specific provision for key workers. In addition participating development partners will deliver below market rental properties. This will be a whole life community for all focused on the needs of residents including providing high quality assisted living units and care accommodation.

1.2 We have previously submitted detailed information with regards to the innovative approach our clients are taking in working with delivery partners, Tirion, Melin and Candleston in order to lead on a model for delivery. The development partners have proven track records of delivering a wide range of quality homes catering for all sectors of society. For ease I set out a summary here which helps to support the policy and demonstrate what is achievable.

Tirion Homes

1.3 Tirion is an independent not-for-profit Community Benefit Society delivering large scale mixed-tenure housing regeneration with a focus on affordable homes. They add value through innovative finance, design excellence and collaboration. They are currently delivering a portfolio of over 1500 units on regeneration sites in Cardiff, Newport and Tonyrefail. Tirion has developed an innovative long-term finance model with M&G Investments facilitating the delivery of over 50% affordable housing on their sites without any Social Housing Grant. The Tirion Model is particularly suited to large scale collaborative projects where the delivery of affordable homes improves rather than hinders viability through highly efficient finance.

1.4 At Ely Mill Tirion has also facilitated the development of a cluster of start up businesses “The Boneyard” which includes a café with pizza oven, therapy facilities, food producers, jewellery makers and crafters, a pottery workshop, furniture upcyclers and a plant emporium.

Melin Homes

1.5 Melin Homes seeks to be a dynamic organisation that works with others to make a positive difference to the people and communities they work with. They provide quality homes and services in Blaenau Gwent, Monmouthshire, Newport, Powys and Torfaen. As a registered social landlord, they work closely with local authorities and other partners to build thriving communities. Their mission is to make a positive impact on neighbourhoods by providing high-quality social housing to those who need it and pride themselves on providing an excellent service to customers.

1.6 Melin has over 4,500 units of accommodation and is on site with a large number of new homes for residents over many different locations. These houses form part of their commitment to develop 1,000 houses over 5 years. They seek to be an independent, ethical and sustainable business that delivers growth within their operating area. Their approach to growth is consistent with the business

approach to thinking longer term and being mindful of the five ways of working set out in the Well-being of Future Generations Act and the seven well-being goals set out in the Act.

1.7 Melin also hosts Y Prentis, a shared apprenticeship scheme which is jointly owned with Monmouthshire Council which was established to meet the increasing demands of socially procured goods, services and works associated with the construction industry in south-east Wales. Since its inception in 2012, Y Prentis has made a real difference in helping to train more than 300 apprentices, supporting more than 120 partners and helping to deliver in excess of 650 qualifications, making a real life positive contribution to the region.

1.8 As an organisation they continue to look forward, to meeting the challenges faced with enthusiasm, determination and imagination, and to reporting on their continuing journey to providing the highest quality homes and services to the people and communities they serve.

Candleston Homes

1.9 Candleston Limited is a wholly owned subsidiary company of Melin Homes and operates in South East Wales. It has been established to develop a reputation as a leading house builder of high-quality sustainable homes, whilst making long-term investment into communities and generating returns for Melin to further its charitable objectives.

1.10 They have delivered a number of new homes across Monmouthshire. The team are working hard on establishing a pipeline of opportunities in strategic locations and have become an essential part of the Melin Homes Group delivering new homes and augmenting the affordable homes provision across the region in which Melin operates.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 13. Do you have any comments on the visitor economy policies?

STRATEGIC POLICY S12 – VISITOR ECONOMY

1.1 Our clients note the significant role that the visitor economy plays in Monmouthshire and in particular its importance to the tourism economy. In addition to supporting local business, there is a need to contribute to the broader needs of the local and national economy. Tourism is of significant value to Monmouthshire, with 2017 statistics showing an influx of 2.24m visitors to Monmouthshire, which provided a £219m boost to the economy with 2,989 jobs supported by the sector. (Visit Monmouthshire, www.visitmonmouthshire.com/ tourism-business-support.aspx), Tourism Performance (2017). Cycling alone is a major contributor to the Welsh tourist industry. Visit Monmouthshire explains that "According to the 2015 Great Britain Tourism Survey, cycling is worth £90 million to the Welsh economy through daily visits and stays. Around 300,000 overnight visits to Wales each year involve cycling and/or mountain biking with an annual worth between £55 and £60 million." (Ibid)

1.2 Within their proposed new community, there are opportunities to connect areas of cultural heritage, education, camping and sports facilities to provide a healthy environment for both residents and visitors alike. There is huge potential, therefore, to take advantage of this burgeoning industry, develop existing facilities and make an even greater contribution through additional connectivity. There are also proposals for an equestrian centre which will be combined with substantial investment in public bridleways to provide a well-integrated set of facilities for horsemanship and exercise.

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 14. Do you have any comments on the sustainable transport policies?

STRATEGIC POLICY S13 – SUSTAINABLE TRANSPORT

1.1 Our clients are supportive of the approach taken towards sustainable transport. It is noted that the policy includes reference to enabling solutions to rural transport issues. Our clients are well aware of the problems faced by rural communities and would like to draw the Council's attention to the benefits that an unconstrained new sustainable settlement could bring.

1.2 Indeed, in their proposals active travel, health and wellbeing, and mobility for all will be the key guiding principles in developing travel plans and sustainable travel choices for their new settlement. It includes a number of innovative solutions towards rural accessibility issues. Cwm Pentref will cater for all the needs of its residents so that they do not need to make distant journeys for basic needs and services.

1.3 It will establish a sustainable transport hierarchy that prioritises public transport, riding, walking and cycling over the use of the car with most facilities within walking distance. As a consequence the following measures are proposed:

Electric shuttle bus & Transport hub

1.4 Located just off the A40 a transport hub is proposed to connect residents, businesses and tourists to the surrounding major cities, towns and villages. An electric bus service operating from the hub would circulate within the site and provide internal connections to local train stations, local centres, school etc. In connection with a number of proposed car-free zones, this service would help ensure that all parts of the development can be easily accessed without having to revert to car travel. The hub would also provide cycle parking and connections onto a site wide footpath and cycle network.

1.5 Bus services operating from the hub would circulate within the site and allow onward bus connections to be made from the hub to Abergavenny, Raglan, Monmouth and Newport. The bus service to Abergavenny would be synchronised with the rail timetable and connect to the King Henry VIII secondary school.

Self contained and sustainable internal movements

1.6 It is proposed that within the development specific areas will be car free and the surrounding neighbourhoods will be within easy walking or cycling distance along a network of cycle and walking routes which have been planned to link all areas within the scheme and local points of interest (Raglan Castle and village, garden centres and local pus and restaurants as well as the nearby gliding centre).

1.7 An interconnected network of over 18km of footpaths and cycleways will provide a safe, off road, choice of routes through the development including safe walks to schools.

1.8 High quality bike storage will be located at strategic points such as the transport hub and local centres to encourage residents to use sustainable transport methods. Routes have been linked to the existing Public Rights of Way (PRoW) crossing the site to allow wider access to the network including National Cycle Routes and an existing National Trail. Footpath and cycle connections between the site and Raglan to the south east will be assessed and improvements explored. Furthermore opportunities will be explored in consultation with Sustrans to extend the network.

1.9 All dwellings will have their own covered cycle storage and sufficient cycle storage will be located at areas of general assembly (local centres, schools etc) and at all the nondomestic buildings.

1.10 The car free areas will be supported by nearby parking generally within 50m of a dwelling. The theme will be walkable neighbourhoods with facilities within 800m. Bus services within the development will be within 300m (max 400m).

EV priority

1.11 Electric Vehicle (EV) charging points will be provided to a substantial number of car parking spaces. These charging points could be connected to PV panels, battery storage and/ or other forms of renewable energy generated across the site (such as the CHP plant in the energy centre).

1.12 For on plot parking private carports will be preferred over garages and the carport roofs can be used for PV (Flexi-solar or similar).

1.13 Over and above walking and cycling, electric car charging and public transport, it is envisaged that a Car Club would be set up with spaces provided at convenient pick up locations throughout the development. In addition, on site infrastructure would be designed to enable future use by connected autonomous vehicles (CAVs).

16. Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 16. Do you have any comments on the community infrastructure and open space polices?

STRATEGIC POLICY S15 – COMMUNITY AND RECREATION FACILITIES

1.1 We are supportive of the approach towards community facilities and recreation,

1.2 Our clients proposal for a new community demonstrate how master planning can deliver sustainable places based around community facilities. Central to their proposal for instance, localised neighbourhood centres will provide access to a wide variety of facilities including shops, business support, schools, health and social care facilities. These centres will be car free places linked to the bus and cycle network. Outdoor market spaces, and communal open areas will encourage farm enterprise and community cohesion.

1.3 Onsite energy centres will distribute locally generated power to the neighbourhood. They will incorporate site management offices and space for the emergency services. Additionally a repair workshop and upcycling centre with tool and equipment hire will be available alongside digital hubs to manage fibre to home connectivity and conferencing infrastructure providing technology support for home working.

1.4 The proposals also seek to create a network of Community Hubs, focused on local energy centres linked by the site's electric bus route and cycle network. These hubs will provide flexible co-working spaces, community rooms for meetings, training, events and classes (such as yoga, brownies, antenatal classes), recycling centres, postal distribution and collection centres, cafes, and space for faith groups to meet. Attached to each hub, a group of almshouses for the elderly and a children's day nursery seek to ensure that different generations can integrate and support one another.

POLICY CI2 – PROVISION OF FORMAL AND INFORMAL OPEN SPACE AND ALLOTMENTS / COMMUNITY GROWING AREAS

1.5 Our clients are supportive of measures that aid the local production of food. Indeed, this is an important component of their approach to their proposed new settlement, which seeks to champion local growers and producers both on and off site. From locally reared meat and dairy, to baked goods and honey, and fruit and vegetables. Their proposals will provide the infrastructure necessary to deliver fresh goods from local farm to the table, (as well as a phosphate free fertiliser as a bi product of the energy centre).

1.6 A new community farm with market garden is proposed, supplying veg boxes to low income residents. Allotments and community gardens, orchards and a 'food forest' will be woven through the development. The neighbourhood centres will cater for regular farmers markets and pop ups.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	x
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Please refer to the representations on the following page.

Question 17. Do you have any comments on the mineral and waste policies?

STRATEGIC POLICY S17 – SUSTAINABLE WASTE MANAGEMENT

1.1 Our clients are of the view that sustainable waste management ought to be promoted and they are supportive of the requirements. However, it ought to be noted that waste is not limited to commercial and household waste, some of which is not currently suitable for standard recycling processes. Rather there is a significant amount of agricultural waste across the Authority. There should be innovative means of dealing with this, for instance our clients proposed Anaerobic Digestion plant will take farm waste from across their landholding and the wider County to generate gas. The bi product will provide a phosphate and nitrate free fertiliser that can be used on local farms and has the potential to remove a major source of pollution (phosphates) from the local eco system and river catchments.

1.2 In addition, our clients proposed waste to energy gasification plant, which will use predominantly waste plastics (that cannot be recycled) along with some biomass to convert waste into a bio-gas. Such a facility could be located within the employment area alongside and indiscernible from other small factory type units with limited impact. In the case of our clients' proposal, the gasification plants would be converted at localised energy centres into heat and power. The heat will feed into a District Heating System in the village centre to support community facilities and higher density accommodation for the elderly and vulnerable whilst surplus can be converted to electricity to feed into the grid or directly to nearby homes.

1.3 Such a sustainable, net carbon zero approach to energy needs (including in respect of charging points for cars, bikes and shuttle buses) provides a unique opportunity for the County.

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	x
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		
Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?		
Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?		x
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?		x
Fails Test 3: Will the Plan deliver (is it likely to be effective)?		x

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The reasons that the plan is not sound and the measures required are set out within our individual responses to the questions raised. In particular in respect of:

Question 2: We are strongly of the view that in order to make the plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy and Option 1 of the Growth Options Paper 2022. In particular that provision should be made for a total of 9,126 homes to deliver a housing requirement of 7,605 homes (this provision is based on a 20% flexibility allowance which we believe will be required in order to ensure that there is no significant under-delivery).

It is noted that any shortfall in housing supply could be addressed through the Strategic Development Plan.

Question 3 & 10: It is considered that in order to make the plan sound additional land will be required to be identified for housing. Given that New Settlements cannot be identified in LDP's, this will need to be addressed through the SDP.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	x
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	x

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE



SEPTEMBER 2024

soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone: - 033 00 13 00 12
e-mail: - enquiry@soltysbrewster.co.uk
Web Site: - www.soltysbrewster.com

LLANARTH ESTATE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

ECOLOGY SUMMARY NOTE

DOCUMENT REF: E24124701/Doc 07 – September 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	17th Sept. 2024	[redacted]		

ECOLOGY SUMMARY NOTE

CWM PENTREF, RAGLAN, MONMOUTHSHIRE

Background

Soltys Brewster Ecology (SBE) were commissioned by Llanarth Estate to undertake an ecological walkover survey of an area of land at Raglan, Monmouthshire (central grid reference: SO404092, see Site Location Plan in Appendix I). The area, which encompasses agricultural farmland with associated hedgerow, treeline and woodland boundaries, has been proposed as a strategic candidate site for residential development as part of Monmouthshire County Council's Replacement Local Development Plan (RLDP) review process. An initial baseline survey was completed at the site by SBE in 2019[1], with an updated Preliminary Ecological Appraisal undertaken again by SBE in 2021[2], following changes to the site's redline boundaries. The results of these surveys are now considered 'out of date' and so in order to establish if there had been any notable changes to site conditions (i.e. type and distribution of habitats), an updated walkover survey was undertaken in August 2024 to inform the current promotion.

2021 Survey Work

The 2021 survey visit (SBE) revealed limited range of habitats at the candidate site, in line with its agricultural use, with conditions largely consistent with the findings of the 2019 survey (see 2021 Extended Phase 1 Habitat Plan in Appendix II). The majority of the site consisted of arable and improved grassland fields which were considered of low ecological importance. Other habitats present included poor semi-improved grassland, plantation woodland, scattered trees and scrub, continuous bracken, hedgerows, ponds, swamp, ditches and buildings – of which hedgerows, ponds and swamp were all identified as Section 7 Priority Habitat under the Environment (Wales) Act 2016.

The habitats present at and directly adjacent to the site were considered likely to support locally foraging/commuting bat species, nesting birds (including ground-nesting birds), Badger *Meles meles* and amphibians, potentially including Great Crested Newt *Triturus cristatus*. The habitats also had limited potential to support Hazel Dormouse *Muscardinus avellanarius* and common reptiles, while the survey identified several trees and buildings at the site with potential to support roosting bats. No invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded at the site.

[1] Soltys Brewster Ecology (SBE) (2019). *Land at Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885901/DOC 02 – 30 July 2019.

[2] Soltys Brewster Ecology (SBE) (2021). *Cwm Pentref, Raglan, Monmouthshire. Preliminary Ecological Appraisal*. Report Reference: E1885902/DOC 01 – 24 August 2021.

A desk study completed as part of the 2021 Preliminary Ecological Appraisal confirmed that the candidate site does not lie within or adjacent to any internationally or nationally designated sites for nature conservation, and neither can any such site be found within a 1.5km radius. Several locally designated Sites of Importance for Nature Conservation (SINCs) were identified in the local area, none of which would be impacted by the proposal based on their physical separation from the site (the nearest SINC was found approximately 400m to the northwest). The data search did reveal that the candidate site contains one parcel of Ancient Semi-natural Woodland (ASNW) and three parcels of Plantation of an Ancient Woodland Site (PAWS), associated with Chapel Wood and Pentwyn Wood. A copy of the 2021 desk study information received from South East Wales Biodiversity Records Centre (SEWBReC) is included within Appendix III.

2024 Walkover Survey

The updated site walkover survey was undertaken on the 15th of August 2024 by a suitably qualified ecologist[3]. Overall, conditions across the candidate site have remained broadly consistent with what was mapped/recorded in 2021, and as such the 2021 Phase 1 Habitat Map (see Appendix II) is still considered to be representative of the site. Site notes taken during the 2024 walkover survey, along with accompanying photos and an annotated map, are included within Appendix IV.

Habitats

The majority of the candidate site remains occupied by a series of arable or improved grassland (mostly Ryegrass leys grown for hay/silage with some sheep pastures in the west) field parcels which were considered to hold limited ecological value and continue to represent the most suited areas for any future development. Other habitats recorded at and immediately adjacent to the site include parcels of plantation woodland, scattered trees and scrub, hedgerows, ponds, swamp, ditches and buildings – all of which are as described in 2021. These habitats, which are mostly associated with the field boundaries/margins, were considered to represent more important ecological features (in context of the site), with hedgerows, ponds and swamp all still listed as S7 Priority Habitats in Wales. The only notable changes since the 2021 survey visit related to some minor changes in land-use practices/management within several of the agricultural fields – these changes are set out in Table 1 below.

[3] Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of habitat and protected species surveys and previous knowledge of the candidate site.

Table 1 – Changes to land use/management in field parcels

Field No.	Changes to habitat/use
F6	Previously Arable – now sown with improved grassland.
F7	Previously poor semi-improved grassland – appears to have recently been sown with improved grassland (Ryegrass ley grown for hay/silage).
F11	Previously unmanaged/dis-used land parcel covered entirely in continuous Bracken – The field is still unmanaged with the Bracken now being replaced by successional scrub comprising Bramble with young strands of Willow *Salix sp*. and Birch *Betula sp*.
F16	Previously improved grassland – now used as Arable.
F19	Previously improved grassland – now used as Arable.

The various buildings found at across the site (i.e. those associated with Wern-Y-Cwrt Farm in the west, or the barn found in the far east) also remain in similar appearance to what was recorded in 2021, with no notable changes to their current use or condition – see Target Notes 1 & 6 in Appendix IV.

No invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were found at the site during the walkover survey. However, Cherry Laurel was noted within one of the woodland parcels in the northern extent of the site (see Target Note 12). While this species is currently not listed on Schedule 9, it is considered particularly invasive and can spread rapidly in woodland environments if left unmanaged.

Protected Species

As the type and extent of habitats across the site have remained consistent with what was recorded during the 2021 survey visit, so does the site's potential to support protected or priority listed species (as discussed in paragraphs 3.37 – 3.50 of the 2021 PEA report). The parcels of woodland, hedgerows and treelines continue to represent good quality habitat for a range of tree/shrub nesting birds and foraging/commuting bats, with the open fields likely support ground-nesting bird species such as Skylark *Alauda Arvensis* – which were observed at the candidate site during the 2019 survey. Several ponds found at and adjacent to the site were also considered to have a low potential to support Great Crested Newt (with this species known to inhabit the local area), while the habitats were also considered to have low potential of supporting Hazel Dormouse and populations of common reptile.

The updated survey confirmed that all of the trees previously (2021) identified as holding potential to support roosting bats are still present and remain in similar condition. This included 2no. trees with high

potential and 14no. trees with moderate potential. Under the current best practice guidelines[4], any trees assessed to hold moderate/high potential (PRF-M) would require further survey work if these were to be felled, as outlined in section 5.4 of the 2021 PEA report. A disused barn within Field 5 was assessed to have a low potential to support roosting bats and so would also require further survey work (for roosting bats) if this was to be demolished or converted/refurbished as part of the development (as outlined in section 5.4 of the 2021 PEA report).

[redacted]

[4] Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition). Bat Conservation Trust, London

[5] Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*: Developing Best Practice in Survey and Reporting. IEEM, Winchester.

Table 3 – Disturbance risks and protection zones for Barn Owl, adapted from Shawyer (2011).

Activity Type	Example	Disturbance risk (displacement from nest)	Min protection zone	Disturbance risk (displacement from nest)	Min protection zone
		Continuous activity		*Occasional activity*	
Pedestrian Movement	Construction workers walking near nest	Low/Medium	20 m	Low	10 m
Artificial lighting	Arc lights illuminating works but (not directed toward the nest)	Low/Medium	30 m	Low	20 m
Vehicular movement	Vehicles or heavy plant moving past the nest	Medium	40 m	Low	30 m
General building and landscape works	Laying of concrete, bricks, roofing using mechanised plant	Medium/High	60 m	Medium	40 m
Heavy construction works	Ground levelling, piledriving, concrete crushing etc. using heavy plant	High	175 m	High	150 m

Conclusions & Recommendations

As conditions at the site have remained largely unchanged, many of the conclusions and recommendations set out in the 2021 Preliminary Ecological Appraisal also continue to remain appropriate for any future development at the candidate site. In order to inform a planning submission, further survey work may be required for bats, Great Crested Newt and Hazel Dormice (dependant on any future site layout plans). There are also several precautionary measures that would also be appropriate during the clearance/construction/operational phases of any future development in order to safeguard wildlife and other features of ecological value at the site. As previously mentioned, hedgerows, ponds and swamp are all listed as S7 priority habitats, and so any loss of these habitats would therefore require some compensation measures, which could entail new habitat provision or the positive management of retained areas of vegetation.

[redacted]

[redacted]ield parcels 3 and 4, as well as the northern extent of field parcel 2, in the eastern extent of the site could be excluded from any future development, with these areas left as open grassland as part of the site's POS or Green Infrastructure (GI) network. These fields could be left as a 'mitigation zone/biodiversity protection area' and enhanced with the arable crops replaced with a species-rich wildflower meadow mix in order to provide habitat resources for a wide range of wildlife. Doing so would also contribute to the scheme achieving a net gain in biodiversity units.

Therefore in accordance with the current LDP and Planning Policy Wales (PPW 12), any development at the candidate site will need to adhere to the avoidance, mitigation and compensation hierarchy. Appropriate avoidance, mitigation and enhancements measures for the site (as set out in the 2021 PEA) are summarised below:

Avoidance

- Any future vegetation clearance at the candidate site i.e. tree/scrub removal to be undertaken outside of the nesting bird season (clearance possible between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.
- Retention of the site's boundary features and field margins as part of the site's Green Infrastructure (GI) network.
- Retention and protection of all Ancient Semi-natural Woodland (ASNW) and Plantation of Ancient Woodland Sites (PAWS) with appropriate buffers separating these from development.
- Retention of any S7 priority listed habitats (i.e. ponds, swamp and boundary hedgerows) as far as practical.
- Retention of any trees considered suitable of supporting roosting bats.
- [redacted]

Mitigation

- Any loss of S7 priority listed habitats to be compensated for through a combination of compensatory measures which could include new species-rich grassland/hedgerow/scrub

planting, new pond creation and retaining parcels of grassland around the site with these managed as wildflower meadows to maintain resources for pollinators/invertebrates.

- Appropriate mitigation for the loss of ground-nesting bird habitat at the site – e.g. retention of field parcels at or adjacent to the site as arable/open grassland, with 'Skylark plots' provided in these fields. [redacted]
- Design of site lighting to minimise artificial light spill onto boundary features and woodland parcels to limit impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 0.5 lux.
- Covering of any excavations overnight or means of escape provided during the construction phase to minimise risks to any wildlife that may become trapped.
- Dependant on likely impacts of any future development layout (e.g. requirement for hedgerow or woodland breaches/loss), further survey work to be completed for bats (transects and automated surveys), Hazel Dormice and Great Crested Newt to inform specific licensing and mitigation requirements with regards to the proposed development layout.
- Precautionary approach to any clearance of fringe vegetation/hedgerows at the candidate site to safeguard reptiles and common amphibians.
- Creation of 130mm x 130mm gaps at the bottom of any garden/boundary fencing to allow continued connectivity through the candidate site for Hedgehog and other small mammals[6].

Enhancement

- Eradication of Cherry Laurel from the woodland parcels.
- Strengthening of any defunct hedgerow boundaries and/or damaged hedgerow sections with new native scrub/tree planting.
- Provision of bat/bird/insect boxes on retained trees and new buildings.
- Provision of rock/log piles along retained boundary hedgerows and woodland edges for use by common herpetofauna.
- Provision of hedgehog houses/homes within retained woodland parcels.
- Design of any SuDS features to benefit biodiversity.
- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity.

[6] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

- Implement management plan for retained and newly created habitats to maintain and enhance their value to local biodiversity.

APPENDIX I SITE LOCATION PLAN

LAND PROMOTION AGREEMENT MAY 2021

North

SCALE 1:6000 @ A3

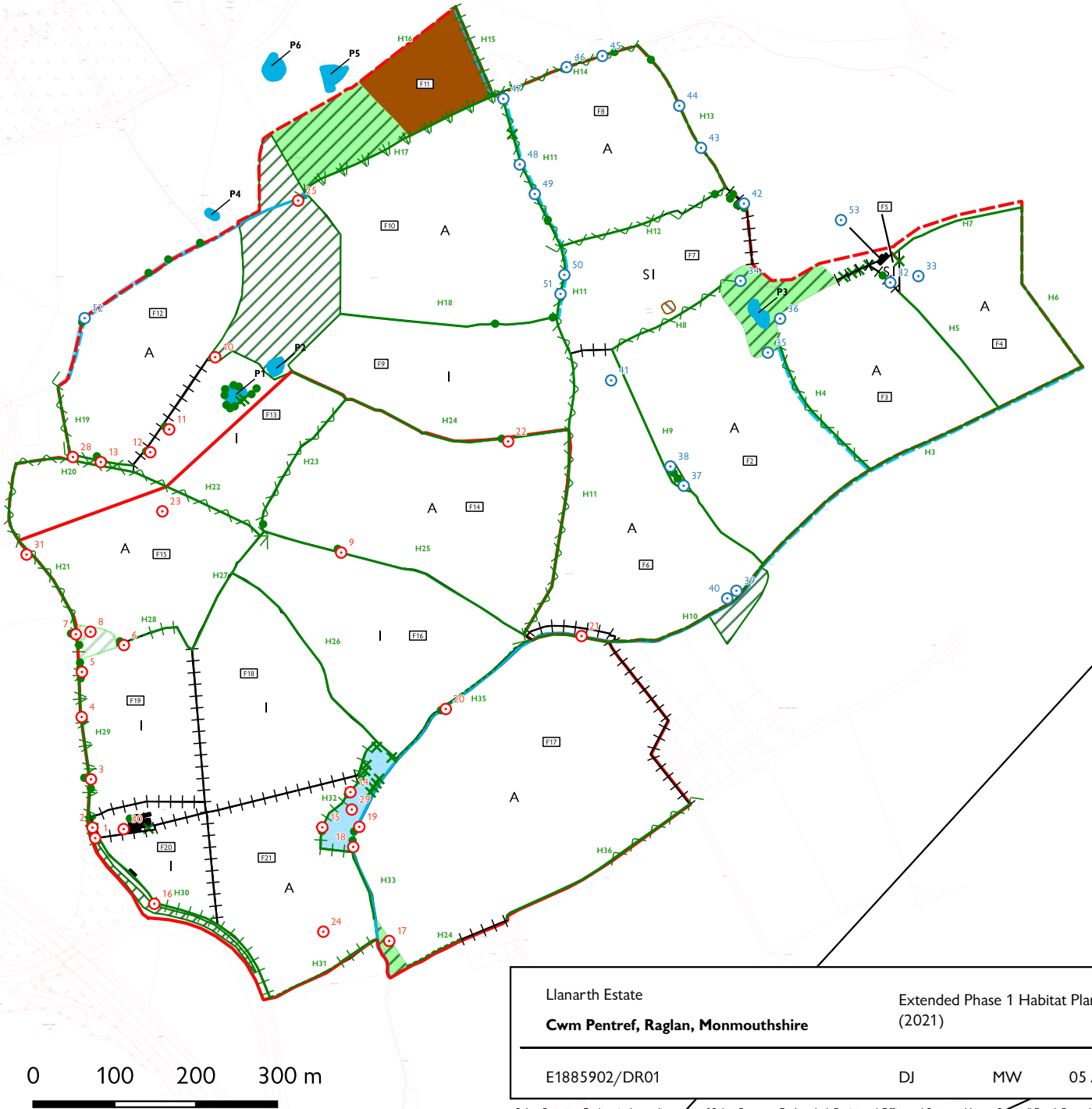
100 m 0 600 m
1: 6,000

PROMOTERS LAND

FIRST OWNERS LAND

SECOND OWNERS LAND

APPENDIX II 2021 EXTENDED PHASE 1 HABITAT PLAN



Key

- Site Boundary/ Survey Area 2019
- Site Boundary/ Survey Area 2021
- A1.1.2 Broad-leaved Plantation Woodland
- A1.2.2 Coniferous Plantation Woodland
- A1.3.2 Mixed Plantation Woodland
- A2.1 Dense/Continuous Scrub
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- B4 Improved Grassland
- B6 Poor Semi-improved Grassland
- C1.1 Continuous Bracken
- C3.1 Tall Ruderal
- F1 Swamp
- F2.1 Marginal Vegetation
- G1 Standing Water
- G2 Running Water
- J1.1 Arable
- J2.1.1 Intact Species-rich Hedgerow
- J2.2.1 Defunct Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- J2.4 Fence
- J2.5 Wall
- J2.6 Dry-ditch
- J3.6 Buildings
- Target Notes 2019
- Target Notes 2021

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Llanarth Estate

Cwm Pentref, Raglan, Monmouthshire

Extended Phase 1 Habitat Plan (2021)

E1885902/DR01 DJ MW 05 August 2021

soltysbrewster ECOLOGY

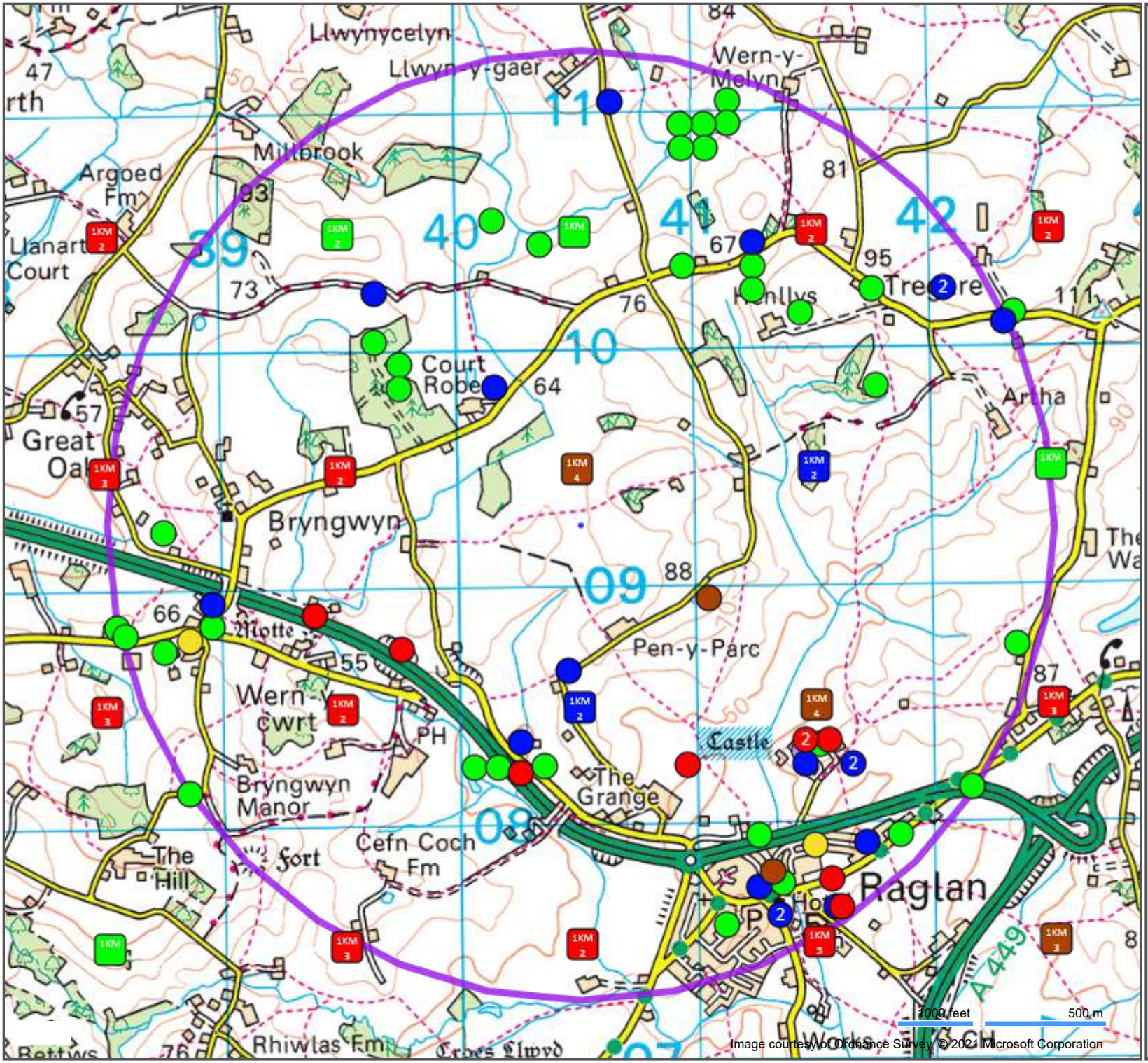
4 Stangate House
Stanwell Road
Penarth
Vale of Glamorgan
CF64 2AA

Tel: 033 00 13 00 12

Email: enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX III DESK STUDY INFORMATION RECEIVED FROM SEWBREC (2021)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CofnodionAmgylcheddol Lleol CYMRU

eMapper for LERC Wales Aderyn Commercial

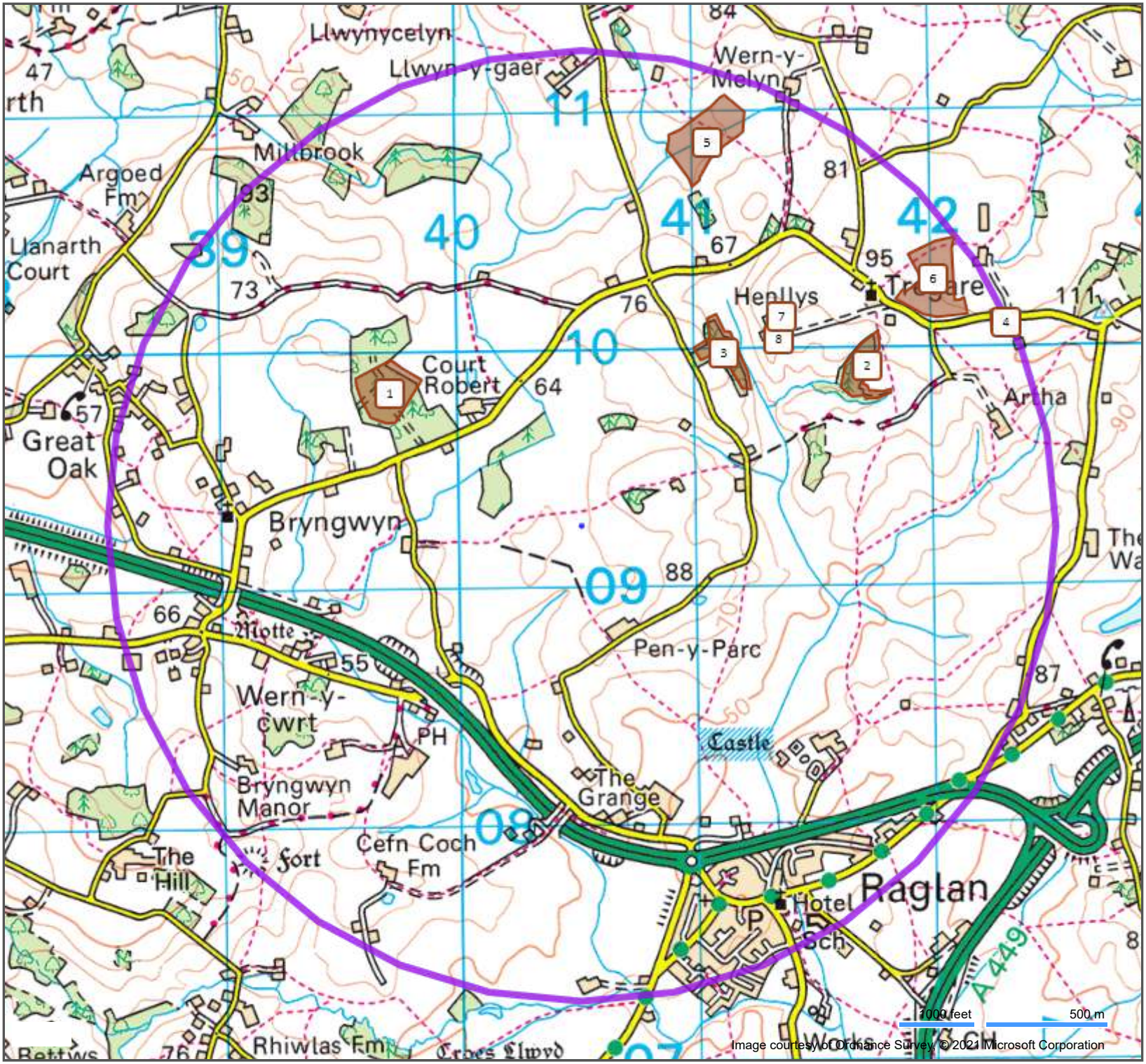
ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf Species Map (Public)

Key

- Search Location
- Search Buffer (2000m)

- **Bees, Wasps, Ants and Sawflies**
- **Birds**
- **Butterflies and Moths**
- **Mammals**
- **Other Invertebrates**
- **Plants**
- **Reptiles and Amphibians**



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDONIAMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

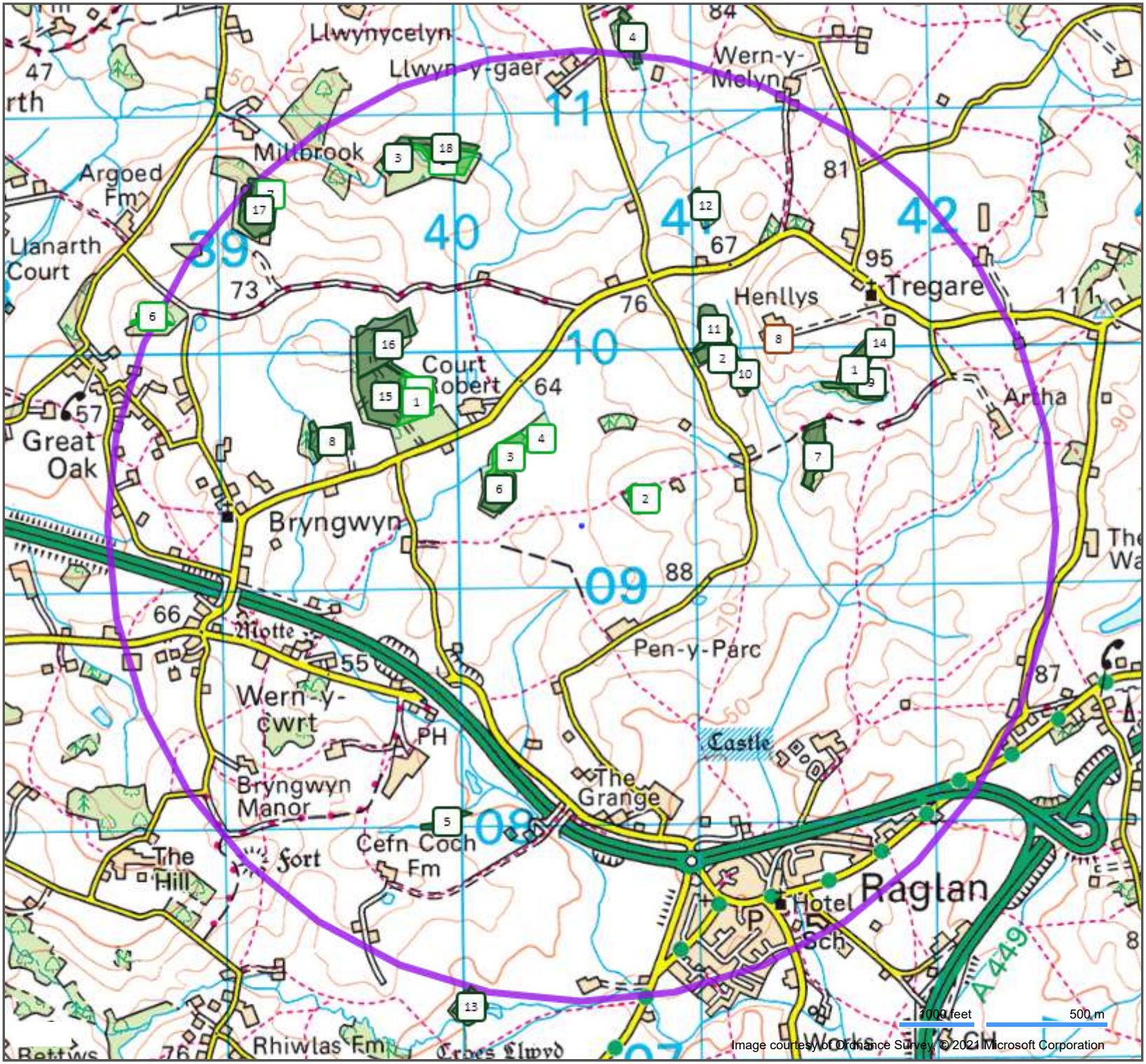
Cwm Pentraf Sites Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Adopted SINC

1. **1**: Coed Robert
2. **2**: Fforest Coed
3. **3**: Henllys Wood
4. **4**: Pen-Y-Walk Meadow
5. **5**: Wern Mellin
6. **6**: Parc-Y-Dert
7. **7**: Henllys Farm (Garden Orchard)
8. **8**: Henllys Farm (Main Orchard)



Aderyn
LERC Wales' Biodiversity & Reporting Database

LOCAL ENVIRONMENTAL RECORDS CENTRES WALES
CANOLFANNAU CORNDDIDIN AMGYLCHEDDOL LLEOL CYMRU

eMapper for LERC Wales Aderyn Commercial

ben-satherley_12/07/2021_cwm-pentraf-raglan / 3416/0212-279

Cwm Pentraf ASNW Map (Public)

Key

- Search Location
- Search Buffer (2000m)

Ancient Semi-natural Woodland

- **1**: Ancient Semi Natural Woodland
- **2**: Ancient Semi Natural Woodland
- **3**: Ancient Semi Natural Woodland
- **4**: Ancient Semi Natural Woodland
- **5**: Ancient Semi Natural Woodland
- **6**: Ancient Semi Natural Woodland
- **7**: Ancient Semi Natural Woodland
- **8**: Ancient Semi Natural Woodland
- **9**: Ancient Semi Natural Woodland
- **10**: Ancient Semi Natural Woodland
- **11**: Ancient Semi Natural Woodland
- **12**: Ancient Semi Natural Woodland
- **13**: Ancient Semi Natural Woodland
- **14**: Ancient Semi Natural Woodland
- **15**: Restored Ancient Woodland Site
- **16**: Restored Ancient Woodland Site
- **17**: Restored Ancient Woodland Site
- **18**: Restored Ancient Woodland Site

Plantation on Ancient Woodland Site

- **1**: Plantation on Ancient Woodland Site
- **2**: Plantation on Ancient Woodland Site
- **3**: Plantation on Ancient Woodland Site
- **4**: Plantation on Ancient Woodland Site
- **5**: Plantation on Ancient Woodland Site
- **6**: Plantation on Ancient Woodland Site
- **7**: Plantation on Ancient Woodland Site
- **8**: Plantation on Ancient Woodland Site

Adopted SINC

- **8**: Henllys Farm (Main Orchard)

APPENDIX IV 2024 SITE NOTES & ANNOTATED PLAN

Target Note	Description/Comment
***Birds seen/ heard**: House Sparrow Passer domesticus, Buzzard Buteo buteo, Barn Owl Tyto alba, Tawny Owl Strix Aluco, Great Tit Parus major, Pheasant Phasianus Colchicus, Red Kite Milvus milvus, Swallow Hirundo rustica, Herring Gull Larus Argentatus, Wood Pigeon Columba Palumbus, Carrion Crow Corvus Corone, Collared Dove Streptopelia decaocto and Wren Troglodytes troglodytes.* ***Other:** Roe Deer Capreolus capreolus and Speckled Wood Pararge aegeria & Large White Pieris brassicae butterflies.*	
Habitats	
1	Renevated bungalow at Wern-Y-Cwrt Farm. Building is in good condition with new roof and render – negligible roosting potental (previous TN30 in 2021 PEA report). Adjacent barn also considered unsuitable for roosting bats (no obvious features and very open/exposed inside), although Swallow are nesting within this structure. 
2	Area previously mapped as a swamp, surrounded by lines of broadleaved trees, hedgerows and dense scrub (previous TN29 in 2021 PEA report). This was found to be dry at the time of the current survey and contained ruderal species such as Hemlock Water-dropwort *Oenanthe crocata*, Common Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium* and Cow Parsnip *Anthriscus sylvestris*. Hedge Bindweed *Calystegia sepium* is also widespread. Several of the mature trees bordering this swamp have potential to support roosting bats.

	
3	Tree with roosting bat potential (see Target Note 20 in 2021 PEA). This tree was previously considered to hold moderate potential although its condition has since deteriated and now contains more potential roosting features. Now considered to hold high roosting potential (PRF-M). 
4	Tree with roosting bat potential (moderate potential/PRF-M – see Target Note 21 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above and landing within this tree during the current survey.

	
5	Tree with roosting bat potential (low potential/PRF-I – see Target Note 37 in 2021 PEA). An active Buzzard nest was identified in this tree in 2021 and this appears to still be in-use, with a Buzzard noted circling above above and landing within this tree during the current survey. 
6	Dis-used barn found in Field Parcel 5 in eastern extent of the site (previous TN53 in 2021 PEA). The barn contains a Barn Owl box, which at the time of the 2021 survey visit, was occupied by Little Owl *Athene Noctua*. [redacted]  



7

[redacted]









8	Large pond found within parcel of plantation woodland ([redacted]. Pond is approx. 500m² in size and is heavily shaded by adjacent and overhanging trees including Willow, Elder *Sambucus nigra*, Oak *Quercus sp.*, Wych Elm *Ulmus glabra*, Sweet Chestnut *Castanea sativa,* Hawthorn *Crataegus monogyna* and unidentified pines. The banks of the pond are shallow and muddy, with sections densely vegetated by Bramble *Rubus fruticosus* scrub. No emergent vegetation noted, with the surface of the pond covered entirely by Duckweed *Lemna minor.* 
9	Pond found in parcel of plantation woodland immediately north of the candidate site (see Pond 5 in 2021 PEA). This pond was previously noted as being large in size (approx. 500-700m²) although was almost dry at the time of the current survey, with approx. 25m² of open water left. The pond is entirely shaded by the adjacent woodland and is choked by leaf litter and woody debris. Remaining water appears turbid. No aquatic or emergent vegetation noted. Banks are shallow and muddy and support mostly young Willow. 
10	Pond found in agricultural field parcel immediately north of the candidate site (see Pond 6 in 2021 PEA). This pond was completely dry at the time of the survey, with its basin entirely covered by ruderal vegetation. Species present indicate that the pond is still likely to hold water for at least part of the year and include Redshank *Persicaria maculosa*, Common Nettle, Fig-leaved Goosefoot *Chenopodium ficifolium*, Pale Persicaria *Persicaria lapathifolia*, Bittersweet *Solanum dulcamara* and American Willowherb *Epilobium ciliatum*. This pond was almost dried-out during the 2021 survey visit.

	
11	Pond found within small woodland parcel immediately north of candidate site boundary (see Pond 4 in 2021 PEA). This was found to be dry during the current survey although in 2021 was noted to be approx. 200-225m2 in size, with turbid water and large amounts of leaf litter. Yellow Iris *Iris pseudacorus* is still present around the pond's location, indicating it still holds water for at least part of the year. The pond is entirely shaded from the surrounding woodland, with shallow muddy banks that support dense Bramble scrub. 
12	Several well-worn mammal pathways and foraging signs were found throughout parcel of plantation woodland in northern extent of the site – these were indicative of Badger, with no evidence found to indicate they were instead made by other small mammals such as Rabbit *Oryctolagus cuniculus*. No setts were found in this woodland during the current survey. Cherry Laurel spreading in this wood.
13	Pond found on edge of plantation woodland in northern extent of the site (see Pond 2 in 2021 PEA). This pond has reduced in size since the 2021 survey visit, and now covers an area of approx. 100m^2. The pond is heavily shaded by surrounding Oaks and subsequently contains large amounts of leaf litter. No aquatic or emergent vegetation noted during current survey, although Yellow Iris and Water-Starwort *Callitriche sp*. were noted here in 2021. Water appears to be poor quality/turbid.

	
14	Pond in centre of field parcel 13 (see Pond 1 in 2021 PEA). This was completely dry at the time of the survey although in 2021 was noted as being approx. 400m² in size. The pond is partially shaded by Willow and Poplar *Populus sp*. scrub. Limited aquatic/emergent vegetation present, with bankside marginal vegetation comprising of Hemlock Water-dropwort, Soft Rush *Juncus effusus*, Common Spike-rush *Eleocharis palustris* and Trifid Bur-marigold *Bidens tripartite*. 2021 survey visit noted evidence to suggest major waterfowl impact. 
15	Tree with high roosting potential (PRF-M – see TN11 in 2021 PEA). Tree contains a bird of prey nest box. No evidence of use found during current survey e.g. feathers, droppings, pellets.

	
16	Tree with high roosting potential (PRF-M – see TN12 in 2021 PEA). A Tawny Owl emerged from this tree during the 2021 survey visit. Tawny Owl may still be nesting within this tree, with feathers found at the base of the tree and splashing/droppings noted along one of the main branches.  
17	Rabbit warren in small woodland copse.


Satellite Imagery © Google 2024

3004

Trustees of the RHT Davies MBE

Alltrust SIPP

MONMOUTHSHIRE RLDP DEPOSIT PLAN CONSULTATION RESPONSE – CS0151 – FORMER TROY RAIL YARD, MONMOUTH (OVERMONNOW)

Support for Policy H9 – Affordable Housing Exception Sites

Policy H9 provides favourable consideration for the siting of 100% affordable housing exception sites adjoining Tier 1, 2, 3 and 4 settlements identified in Strategic Policy S2, that would not otherwise be released for residential development provided that all of the following criteria are met:

a) *The scheme meets a genuine local need which could not otherwise be met within the locality;*

b) *The proposed homes are of a size, tenure and design which is commensurate with the identified affordable housing need of the locality;*

c) *The proposal relates to:*

   i) *25 or less homes in Tier 1 Primary Settlements,*

   ii) *15 homes or less in Tier 2 Secondary Settlements,*

   iii) *10 homes or less in Tier 3 Main Rural Settlements or*

   iv) *5 homes or less in Tier 4 Minor Rural Settlements;*

d) *The site represents a logical extension to the existing settlement with no significant adverse impact on settlement form, character and surrounding landscape;*

e) *The affordable housing meets the needs of local people and will be managed by a Registered Social Landlord (RSL) in perpetuity, which will be secured via a S.106 legal agreement. In exceptional circumstances where an RSL is not involved, clear and adequate legal agreements must be in place to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers.*

The MCC Local Housing Market Assessment (LHMA) Refresh 2022-2037 identifies over 2,000 households within the county in need of affordable housing. In line with national guidance, Policy H9 presents an opportunity for MCC to provide urgently needed affordable housing in sustainable locations.

While the Deposit Plan does not provide a 'target' number of affordable dwellings to be delivered via exception sites, Policy H9 is a 'local indicator' of Strategic Policy S7: Affordable Housing Provision which seeks to deliver 1,595 to 2,000 affordable homes over the Plan period 2018-2033. It is therefore considered that inclusion of Policy H9 provides an opportunity to further de-risk the plan in terms of affordable housing provision if residential site allocations (comprising 50% affordable homes) do not come forward as anticipated.

Therefore, we fully support the inclusion of Policy H9 in the Deposit Plan.

CS0151 – Former Troy Rail Yard, Monmouth

It is the land owner's intention to utilise Policy H9 in collaboration with a Housing Association to deliver 25 affordable homes at the Former Troy Rail Yard, Monmouth (Candidate Site Reference: CS0151).

The western boundary of CS0151 adjoins the settlement boundary of Monmouth to the south representing a logical extension to the existing settlement. Land at the Former Rail Yard, a brownfield site, has been promoted for development of 26no. dwellings under planning application DM/2018/00640. The site is located approximately 1km south of Monmouth town centre, to the east of an existing residential cul-de-sac at Troy Gardens and is accessed via Beech Road. Planning application DM/2018/00640 was withdrawn in May 2022, however at this point, matters relating to design and siting, affordable housing and flood risk

were considered acceptable. At the point of withdrawal of the application, significant design and technical work had been undertaken in support of the planning application and the applicant had worked closely with MCC to progress a scheme which functioned well and exhibited good placemaking credentials.

An FCA has previously been submitted which confirms:

- Part of the site is located in Risk of Flooding from Rivers Flood Zone 2 and Zone 3, i.e., is considered to be at risk between lower than 1 in 100 year (1%). No development to be proposed in the flood risk areas.
- Marginal Surface Water and Small Watercourses risk is currently present in parts of the site (Zone 3 for Surface Water and Small Watercourses). The risk is present outside the property and site access routes.
- The development will not lead to increase of flooding anywhere else since adequate attenuation will be designed for events up to and including the 1-in-100yr.
- A foul pumping station will be used to manage foul flows. The foul pumping station to be positioned outside Flood Zone 3 and Flood Zone 2.

In accordance with Policy H9, Land at Former Troy Rail Yard presents a viable and deliverable opportunity to deliver 25 affordable homes at a sustainable location within Monmouth.

3028

Coldbrook Estates

MONMOUTHSHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN CONSULTATION

POLICY HA1 - LAND TO THE EAST OF ABERGAVENNY

1. Policy and Guidance Parameters for Abergavenny East

Development of Land to the East of Abergavenny (Abergavenny East) would present a logical extension to the town containing a mix of residential uses alongside employment/commercial uses, associated facilities and services that would be well connected to local services and facilities. **We fully support the intention to allocate land to the east of Abergavenny for residential-led mixed-use development.**

The policy context underpinning the allocation and future development of Land East of Abergavenny (considered in detail at section 4) tells us that the site should:

- Demonstrate effective use of placemaking tools;
- Be a deliverable site meeting The Development Plans Manual's (2020) 'Tests of Soundness';
- Be an exemplar residential-led, mixed-use community;
- Enable people to access well-connected employment and services via efficient and sustainable journeys;
- Sustain and create places in which further fragmentation and isolation of habitats and species is avoided;
- Maximise the potential of green infrastructure and open space provision to strengthen the existing GI network;
- Grow the economy of Abergavenny (and wider areas) in a sustainable manner;
- Make the best use of resources;
- Facilitate accessible and healthy environments;
- Create and sustain communities and
- Maximise environmental protection and limit environmental impact.

2. Proposed Framework Plan

In accordance with the above, a more sustainable alternative for Abergavenny East is presented within the proposed Framework Plan and Detailed sketch of the proposed Local Centre (see **Appendix 1)** which has been produced following the preparation of the following reports/documents (see **Appendices 2 - 8**):

- Landscape and Visual Statement (Soltys Brewster)
- Annotated Landscape Viewpoints (Soltys Brewster)
- Visual Constraints and Opportunities Plan (Soltys Brewster)
- Preliminary Ecological Appraisal (Soltys Brewster)
- Green Infrastructure Strategy and accompanying Statement (Soltys Brewster)

- Transport Access and Movement Strategy - Technical Note (RPS)
- MHA Site Access Review (RPS)
- High-level drainage strategy (RPS)

The key elements, principles and benefits of the proposed Framework Plan, are illustrated in **Table 1** below:

Table 1: Proposed Framework Plan: Key Elements, Principles and Benefits

Deliverability	The proposed Framework Plan has been planned practically and in line with placemaking principles to ensure Abergavenny East is suitable and deliverable, thus meeting the 'Tests of soundness' as required by the Development Plans Manual. The Proposed Plan ensures that the critical 'western side' of the site (promoted by Coldbrook Estate) is deliverable in line with MCC's vision.
Land Use and accordance with Policy HA1	The proposed Framework Plan comprises a similar scale of development (31.4ha) to that proposed in the Deposit Plan. In accordance with site requirements as per Policy HA1, the Framework Plan facilitates: - 625 residential units (500 within the plan period, the remainder comprising potential future development) - New local centre with 58,125 sqft of potential ground floor commercial/community uses with residential development integrated (a proportion of the 500 total units). - A Park and Ride Facility (0.25ha) - Greenspace (15.6ha – includes existing landscape and attenuation) - A new 'street' (see vehicular access below) along the western edge with active frontage - LAP and LEAP facilities
Placemaking	The development East of Abergavenny is focused around the Design Commission for Wales' (DCFW) Placemaking Charter. There is a strong commitment to creating sustainable, inclusive, and people-focused places that enhance community wellbeing and reflect local identity as demonstrated in the masterplan. Please see Appendix 8 for a document outlining the development's compliance with the six DCFW Placemaking Principles.
Landscape and Visual	The proposed Framework Plan closely considers visual sensitivity. Proposed development within the Framework Plan does not extend beyond the 110m contour line. The majority of development is situated within areas of low relative baseline sensitivity (see Appendix 6 for Annotated Landscape Viewpoints and Visual Constraints and Opportunities Plan) thus minimising the visual impact of the site. Conversely, the masterplan as presented in the Deposit Plan proposes areas of residential development extending into areas of relative high baseline visibility.
Green Infrastructure	The scale and layout of the Framework Plan reflects the Green Infrastructure Strategy prepared in respect of the site and accords with PPW Chapter 6 to a greater extent than the Deposit Plan. Principally, the lower more visually contained slopes of the site correspond to habitats of low ecological value with remaining more sensitive land parcels having the capacity to accommodate GI mitigation and enhancements. In this respect, it is not clear whether the masterplan presented within the Deposit Plan is adequately underpinned by a sound Green Infrastructure Strategy as required. Where practical, the eastern development edge of the Framework Plan aligns with existing field/boundaries and hedgerows to reduce potential adverse impacts. Also, existing trees and hedgerows within the site have been retained wherever possible.

	Development blocks work with the contours of the site to help minimise engineering and retaining elements. In addition to retained features, the Framework Plan proposes an attractive green edge which extends either side of the local centre on the western boundary, strengthening the GI network.
Pedestrian and Cycle Links	The proposed Framework Plan affords strong and seamless pedestrian links to the new proposed footbridge at Abergavenny Train Station from the central arrival space of the site. In addition, the site connects into existing footpaths to Abergavenny Train Station from the south of the local centre area. Pedestrian and cycle routes link into the wider area via existing and established connections. The southernmost cycle and pedestrian connection will link new residents to existing settlements beyond the A40 - this link is not afforded by the MCC masterplan within the Deposit Plan. An existing pedestrian and cycle route in the north west of the site linking to Firs Road and the wider area is also incorporated in the proposed scheme. The proposed Park and Ride facility is easily accessible from the new local centre and train station. Existing PRoW's are retained and incorporated into the scheme facilitating east-west and north- south permeability through the site. In addition, proposed off road foot/cycle paths within the site create safe and attractive routes for residents further encouraging active travel.
Vehicular Access	The proposed Framework Plan seeks to provide a deviation in alignment, raised tables and change in materials to slow traffic, create a sense of arrival and turn the A465 into a street at the site of the vehicular access. These mechanisms also facilitate the collocation of vehicular access and other modes in the vicinity of the railway station (see above). The 'street' will also extend along the extent of the proposed local centre (comprising commercial and community uses) creating a strong frontage along the A465. There is potential for buses to serve the development via creation of new stops at this location.
Drainage	The Framework Plan proposes attenuation ponds along lower levels of the site creating an attractive green edge extending north and south of the 'community hub'.

3. Delivery

Policy HA1 – Land to the east of Abergavenny in its current iteration within the Deposit Plan is not deliverable. It is acknowledged within the supporting text of Policy HA1 that the western end of the site plays an important role in integrating the new neighbourhood with the railway station and wider Abergavenny and offers potential to provide a 'community hub' serving both the urban extension and the railway station area, park and ride facility for the railway station, and linkages to and from the allocation to the station and Abergavenny. However, the 'western end of the site' comprises land promoted by the Coldbrook Estate (see CS0293 at **Appendix 9**) in addition to land promoted by Monmouthshire Housing Association (MHA) (see CS0213 at **Appendix 9**).

Despite the promoters/landowner (Coldbrook Estate) of Candidate Site CS0293 consistently expressing willingness, MCC has chosen not to fully engage throughout the masterplanning process of the Strategic Site. As the landowner of CS0293 has not agreed to the masterplan presented in the Deposit Plan, there is no delivery mechanism for the allocation in its current form.

4. What does the policy context tell us a Key Site at Abergavenny East should look like?

The following sections seek to outline the policy context which underpins the allocation and future development of Abergavenny East.

The Development Plans Manual (Edition 3) March 2020

The Development Plans Manual states that Key Sites, such as Abergavenny East, should provide a key starting point for further design collaboration and inform detailed site-specific master planning and viability work. Abergavenny East must demonstrate effective use of placemaking tools which should be undertaken collaboratively between MCC and key stakeholders responsible for the delivery of the site (i.e. the site promoters of CS0293 and CS0213), as well as the local community.

Principally, Abergavenny East should be a deliverable site to meet the 'tests of soundness'. MCC must be able to demonstrate, in broad terms; the site is deliverable with no significant impediments to implementation.

As a site key to the delivery of the plan, the Manual requires Abergavenny East to have greater evidence to support their delivery including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. The Manual suggests these principles should be set out in Statements of Common Ground (SoCG).

Planning Policy Wales (Edition 12)

Development at Abergavenny East should strive to support well-being through placemaking (Chapter 2 of PPW); it is noted that this should be implemented in the plan making process. In order to achieve the 'right development in the right place', Abergavenny East should:

- Grow the economy of Abergavenny (and wider areas) in a sustainable manner
- Make the best use of resources
- Facilitate accessible and healthy environments
- Create and sustain communities; and
- Maximise environmental protection and limit environmental impact.

Effective strategic placemaking of Abergavenny East requires the collective consideration of the above placemaking principles.

Abergavenny East should be an active, social and productive place (Chapters 4 and 5 of PPW). Development should enable people to access well-connected employment and services via efficient and sustainable journeys, by walking, cycling and public transport. This pertains to both movement within the development and the facilitation of sustainable connections to the wider area. Further, MCC should ensure there is a strategic approach to the provision of community facilities that address the requirements of new and existing residents.

Finally, Abergavenny East should be a distinctive and natural place (Chapter 6 of PPW) in line with key policy changes relating to Green Infrastructure, Net Benefit for Biodiversity, the Step-wise Approach and Trees and Woodlands. Abergavenny East should sustain and create places in which further fragmentation and isolation of habitats and species is avoided, wherever possible, and wildlife corridors forming wider ecological networks are protected, maintained and enhanced as part of development.

MCC Vision

Abergavenny East is allocated as a Strategic Mixed-Use Development including residential (500 homes), a mixed-use neighbourhood centre, a park and ride and B1 Use Class Uses. A key principle

behind the allocation of the site is the creation of an exemplar residential-led, mixed-use community including a ‘community hub’.

Abergavenny has been identified by MCC as a ‘key GI opportunity’ (MCC Green Infrastructure Strategy, 2024). The site should maximise the potential of green infrastructure and open space provision to strengthen the existing GI network. The site should also create focal points for the community in line with placemaking objectives associated with the site.

Abergavenny East should be well integrated with the existing settlement via connection links that provide crossings across the railway line and the A465.

5. Conclusion

The proposed Framework Plan offers a more sustainable alternative for Abergavenny East than the current masterplan and seeks to better address the requirements of the site as per the policy context and outcomes sought by MCC. Therefore, this representation seeks amendment to the proposed allocation boundary.

The promoters of site CS0293 remain prepared to work with MCC and other stakeholders to masterplan a Strategic Site at Abergavenny underpinned by the proposed Framework Plan for inclusion in the RLDP.

Appendix 1

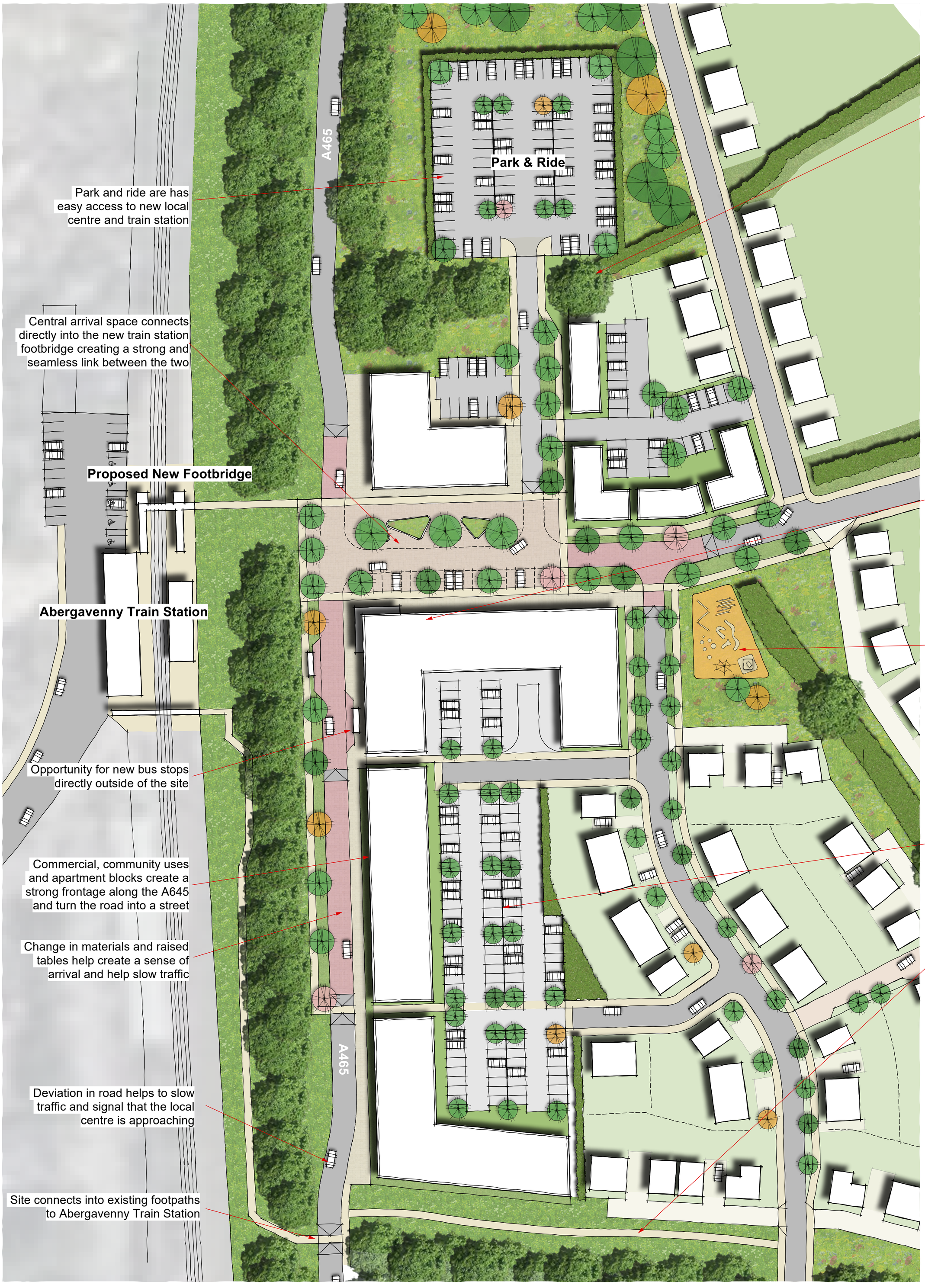
Framework Plan and Local Centre Sketch Scheme

Draft Development Masterplan



Framework Masterplan (source: RL)

1. Attenuation ponds at lowest point on the site - creates attractive green edge to the main road.
2. Development blocks work with the contours of the site to help minimise engineering and retaining elements.
3. Site Access from A465.
4. Non ticketed access to Abergavenny town centre.
5. Ticketed access to train station for residents and Park & Ride.
6. New local centre, with commercial and community uses creates entrance space and strong frontage along A465.
7. Pedestrian and cycle routes link into the wider area via existing and established connections.
8. Existing PROWs retained and incorporated into the scheme.
9. Development does not extend beyond the 110m contour line to minimise visual impact.
10. Existing trees and hedgerows wherever possible.
11. Play spaces integrated into swathes of the land to create a green focused development.



0m 10m 20m 30m 40m 50m

Roberts Limbrick
03333 405 500
mail@robertslimbrick.com
robertslimbrick.com
Registered Office: England No. 06658029

Project Name
Land East of Abergavenny

Client Name
Coldbrook Estate

Drawing Title
Local Centre Sketch Scheme

Scale	Project No.
1:500 • A1	11599

Status	Purpose Of Issue
-	-

Project	Org	Vol	Level	Form	Role
11599	RL	ZZ	XX	DR	MP

Number	Revision
SK02	-

Appendix 2

Access and Movement Technical Note

TECHNICAL NOTE

Project Title:	Abergavenny East Strategic Site (CS0213)
Report Reference:	794-PLN-WWP-JPW1602-01a (TRP)
Date:	26 March 2024

Transport Access Strategy

Introduction

1.1 RPS has been commissioned by to prepare a high-level transport access strategy in relation to the Abergavenny East Strategic Site (CS0213).

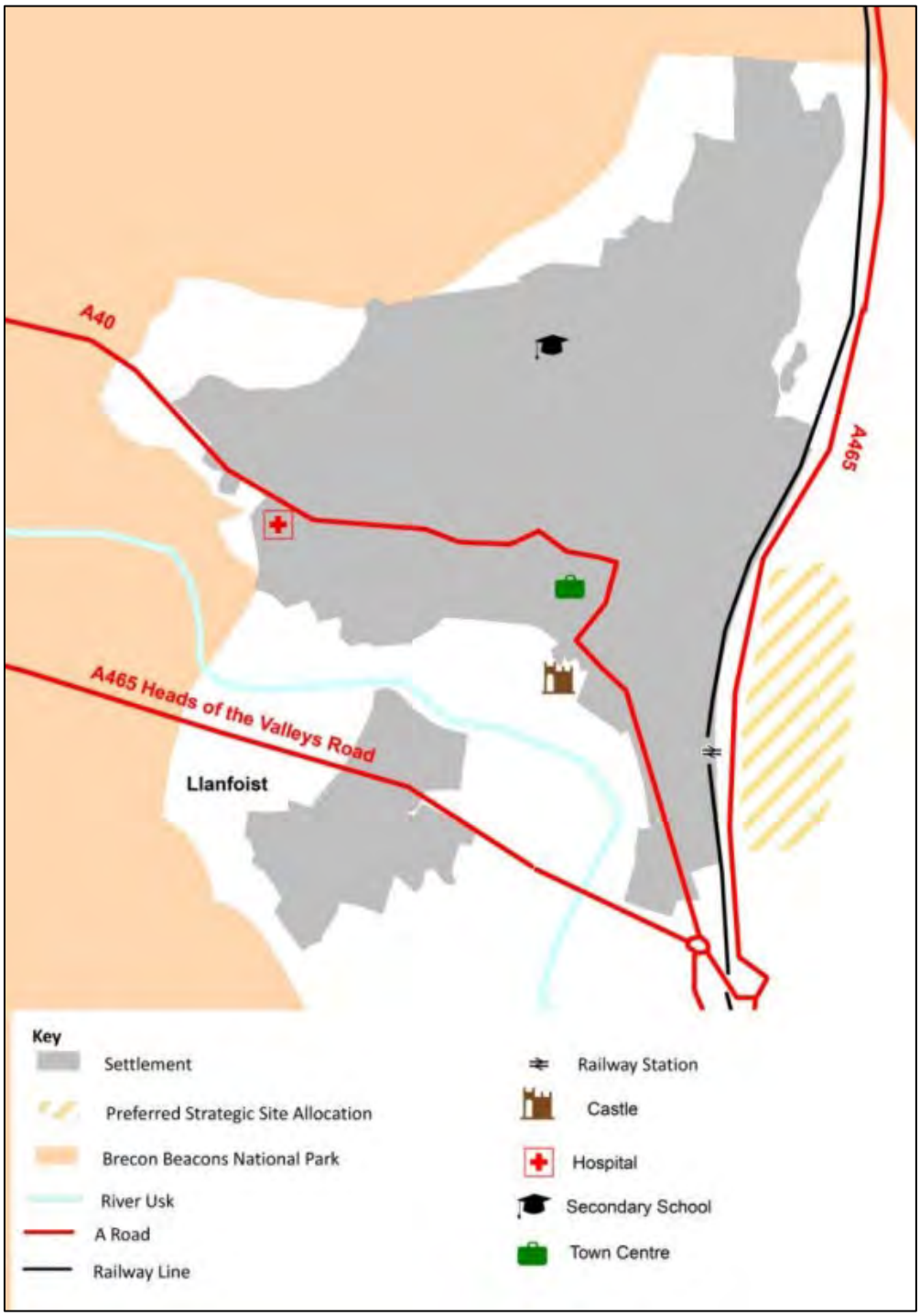
1.2 This note details the vehicular access strategy to serve the site via the A465 and the pedestrian and cycle connections.

Abergavenny East Strategic Site

1.3 The site is located to the east of Abergavenny town the A465. Abergavenny rail station is located to the west of the A465, and the railway line runs parallel to the road on a north / south alignment.

1.4 **Figure 1** details the site location.

Figure 1: Abergavenny East Strategic Site (CS0213)



1.5 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a

well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use development, containing a mix of residential uses alongside employment/commercial uses, facilities, and services.

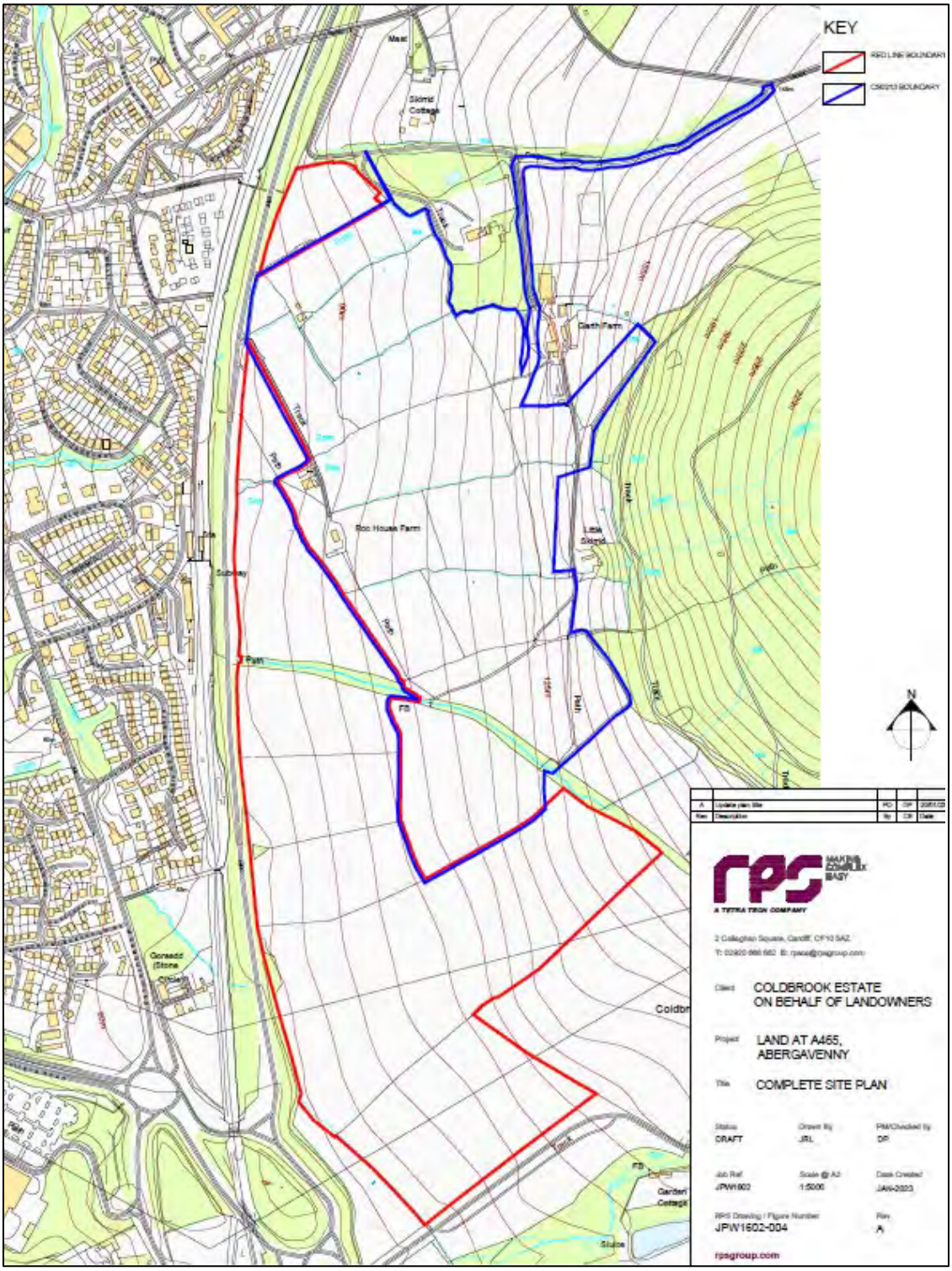
1.6 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre (0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

1.7 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update75. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.

1.8 Considering the delay with the RLDP, the time needed to open up the site (including the provision of significant infrastructure namely a cycle footway bridge over the A465 and railway) and a realistic completion rate, the size of the candidate site means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

1.9 To deliver the Abergavenny East strategic site allocation (detailed in Figure 1) candidate sites have been submitted as detailed in **Figure 2** and the full plan is provided at **Appendix 1**.

Figure 2: Abergavenny East Strategic Site (CS0213) Candidate Sites Plan



Vehicle Access Arrangements

1.10 The A465 forms the western site boundary and provides the potential for vehicle access to the site.

1.11 Traditionally, highway authorities have argued that the larger the site, the more likely it is that a single access could be blocked preventing access for emergency vehicles. This has led to highway authorities seeking to limit the number of dwellings served via a single access and request secondary or emergency accesses beyond a certain threshold of houses.

1.12 However, since Manual for Streets (MfS) there are less stringent requirements in relation to the need for a secondary emergency access. The requirements for emergency vehicle access are generally dictated by the fire service. MfS states the following regarding fire service emergency access in the bullets to para 6.7.3:

> **"Authorities have often argued that the larger the site, the more likely it is that a single access could be blocked for whatever reason. The fire service adopts a less numbers driven approach and considers each application based on a risk assessment for the site and response time requirements."**

1.13 The scale of the proposed development could potentially be served by a single point of vehicle access, subject to the results of the fire service risk assessment. The views of the local Highway Authority will also need to be sought as part of any pre-application scoping discussions.

1.14 The other consideration will be the capacity of a single point of highway access to accommodate the existing A465 and proposed development traffic.

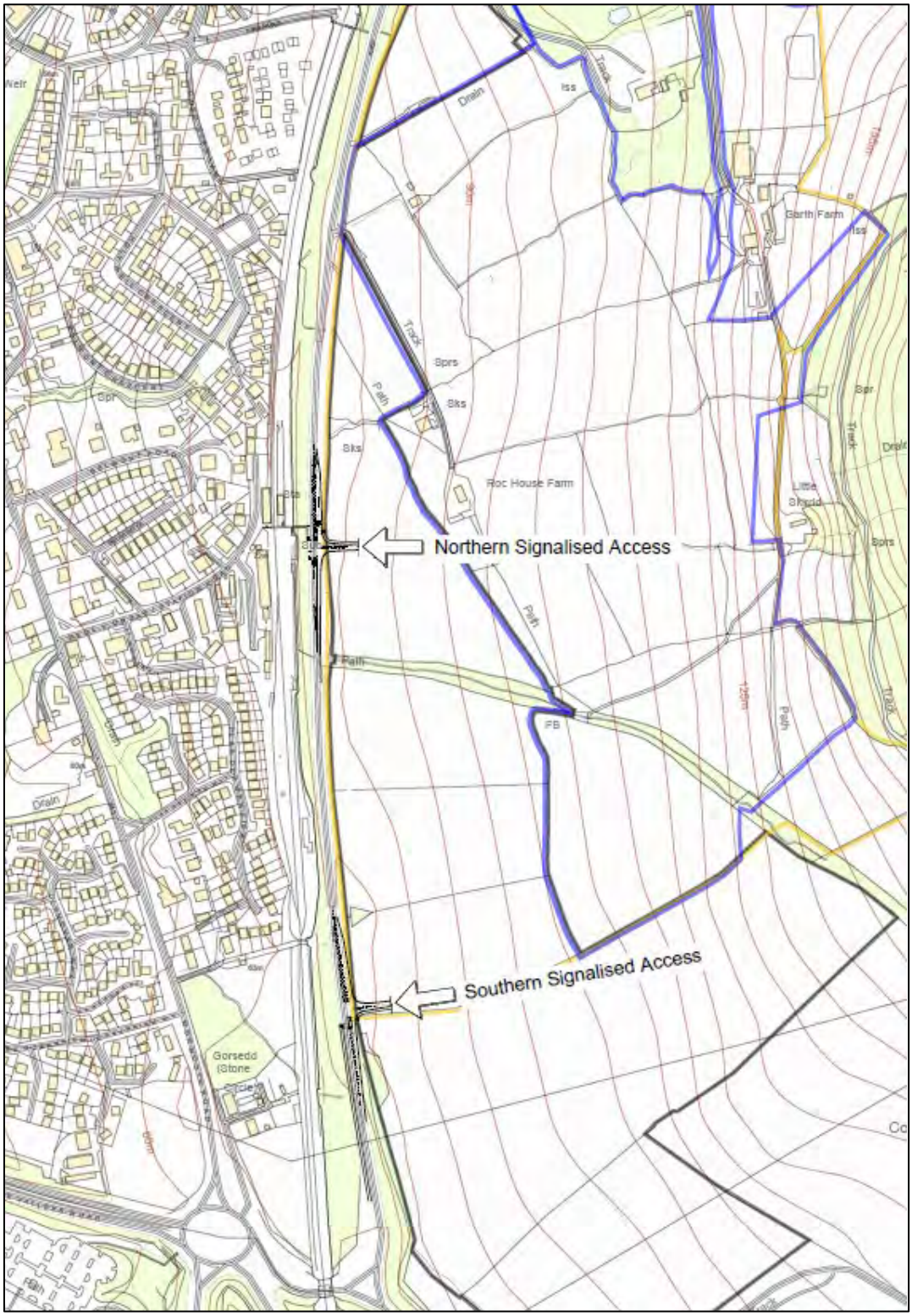
1.15 RPS has produced a preliminary design for two traffic signal-controlled vehicle access options via the A465, one located to the northwest of the site and the other to the southwest.

1.16 The northern access has been located adjacent to the existing railway bridge. This will allow for pedestrian and cycle connection to the station and Abergavenny beyond via an improved railway bridge. In addition, the northern access will provide an important traffic calming effect at the point where pedestrians and cyclists cross the A464 to access the railway bridge.

1.17 The southern access has been located close to the roundabout with the A40 and the existing cycleway on the western side of the A465.

1.18 The location of the northern and southern access arrangements is detailed in **Figure 3**.

Figure 3: Northern and Southern Signal Controlled Access Options

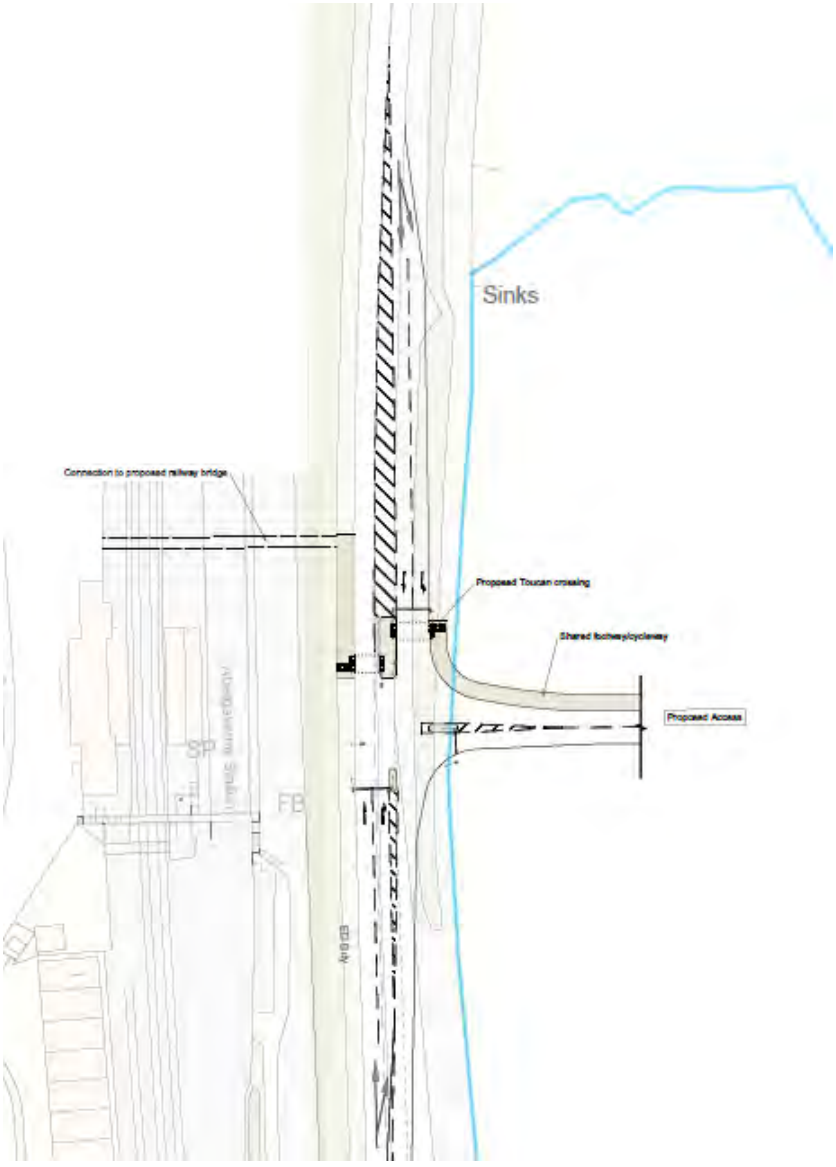


1.19 The northern and southern access arrangement options are described in greater detail below.

Northern Traffic Signal Controlled Access – Option 1

1.20 The preliminary design of a signalised junction is detailed in **Figure 4** and the full design provided at **Appendix 2**.

Figure 4: Northern A465 Signalised Access – Option 1



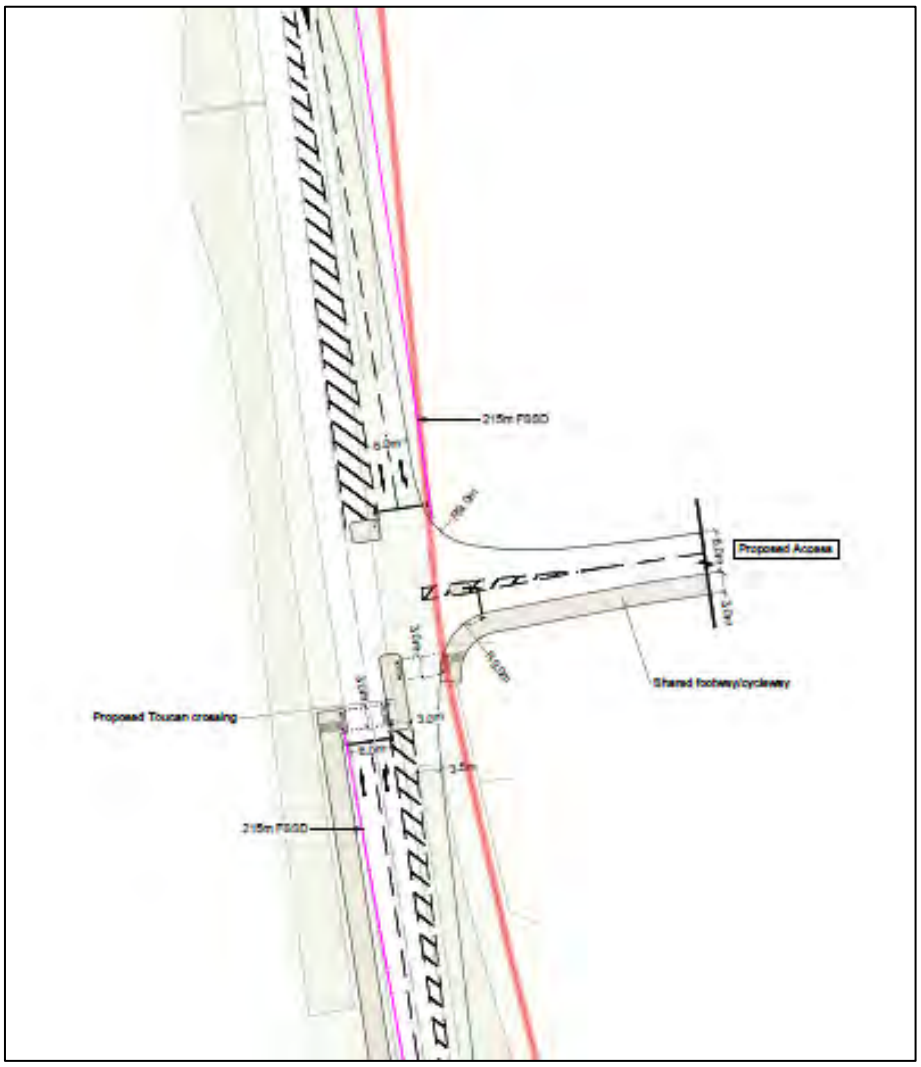
1.21 The signalised junction has been designed in accordance with the standards contained in the Design Manual for Roads and Bridges CD 123 'Geometric design of at-grade priority and signal-controlled junctions.

1.22 The signalised junction also details the proposed connection to the railway bridge to provide access to the railway station and Abergavenny to the west of the site.

Southern Traffic Signal Controlled Access – Option 2

1.23 The preliminary design of a signalised junction is detailed in **Figure 5** and the full design provided at **Appendix 3**.

Figure 5: Southern A465 Signalised Access – Option 2



1.24 The signalised junction has been designed in accordance with the standards contained in the Design Manual for Roads and Bridges CD 123 'Geometric design of at-grade priority and signal-controlled junctions.

1.25 The signalised junction also includes facilities to connect to the existing cycleway on the western side of the A465, to the south of the junction. The design initially includes crossing facilities via

the southern arm. However, if the southern signalised access option is not provided, there will be requirement to provide a standalone signalised crossing to accommodate pedestrian and cycle movements.

A465 Speed Reduction Measures

1.26 The development proposal will introduce built form on the eastern side of the A465 for the length of the site frontage. This is likely to change the character of the A465 for road users from a rural to more urban setting. There are opportunities to reduce the existing National speed limit from 60mph to either a 50mph or 40mph speed limit. The proposed signalised access to the site will also assist with breaking up vehicle speeds and provide a traffic calming effect.

1.27 The opportunities to reduce the existing speed limit would need to be explored with the Highway Authority as part of the more detailed transport planning work to support a planning application. Any changes to the existing speed limit on the A465 will require a traffic regulation order and will need to be agreed with the Highway Authority and Police in principle.

Pedestrian and Cycle Movements

Strategic Pedestrian / Cycle Connection – Abergavenny Railway Footbridge

1.28 The existing high speeds on the A465 do not provide a conducive environment for pedestrians and cyclists. A pedestrian and cycle connection to the existing railway footbridge is required.

1.29 Abergavenny railway station is currently served by a footbridge that connects the two platforms and connects to the western verge of the A465. The existing railway footbridge is shown in **Figures 6 and 7**.

Figure 6: A465 Access to Railway Footbridge



Figure 7: Station Road Access to the Railway Footbridge



1.30 The existing railway bridge does not provide step free access between the railway platforms and the A465. In addition, there appears to be a steep level difference between the eastern side of the bridge and A465 highway verge.

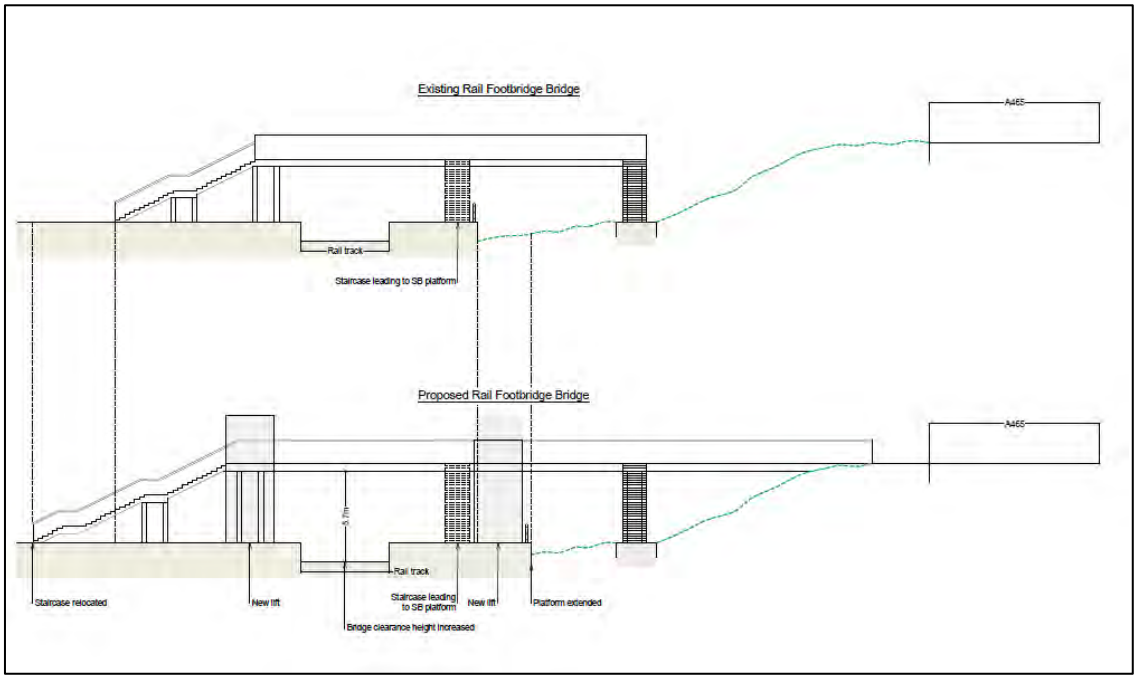
1.31 A new railway crossing will be required that provides level access from the A465 western verge and step free access to the railway platforms and Station Road. This will be a key infrastructure requirement to successfully connect the development site to the station and the existing Abergavenny settlement.

1.32 A signalised crossing will also be required on the northern arm of the proposed signalised access to facilitate pedestrian and cycle movements across the A465.

Potential Railway Bridge Improvement

1.33 The existing bridge and preliminary design of the potential railway bridge improvement is detailed in **Figure 8**. The existing bridge and proposed railway bridge is detailed in the full drawing provided at **Appendix 4**.

Figure 8: Potential Railway Bridge Improvement



1.34 The above schematic drawing details a new level access railway bridge connecting to the proposed access arrangements and pedestrian crossing on the A465. The potential railway bridge improvement includes the provision of lifts to provide accessible access to both railway platforms. Network Rail would potentially provide the station (left) side of the footbridge improvement and the development site would provide the connection to the A465 (located to the right of the railway line).

1.35 The bridge clearance height has been increased to allow for any future overhead line electrification. The cross section has been developed without the benefit of any level information such as Lidar data. Lidar data is not available for the A465, railway line and existing footbridge.

1.36 As such the proposed railway bridge design should be treated as an initial illustrative drawing to demonstrate what may be possible in terms of improvement to pedestrian and cycle connections.

Accessibility Project at Abergavenny Railway Station

1.37 It is understood that Network Rail are currently developing plans to provide disabled access to Abergavenny Railway Station. A scheme is being developed to install a new fully accessible footbridge with lifts that will link platforms one and two. The scheme will be funded by the Department for Transport's Access for All programme – match funded by the Welsh Government through Transport for Wales.

1.38 RPS have contacted Network Rail to find out more about the proposed footbridge improvements. There is the potential for the development site to tie into the proposed footbridge in terms of a level connection to the western side of the A465.

A465 – Southern Pedestrian / Cycle Access

1.39 The development site provides the opportunity to connect to the existing cycleway on the western side of the A465 that terminates to circa 130m to the north of the junction with A40. The connection will either be via the pedestrian crossing facilities detailed on the southern access Option 2 or via a standalone signalised crossing. The existing A465 cycleway is shown in **Figure 9**.

Figure 9: A465 – Southern Pedestrian / Cycle Access



Summary and Conclusion

1.40 The scale of the development proposed could potentially be served via a single point of vehicle access via the A465, subject to the results of the fire service risk assessment and capacity assessment.

1.41 Two signalised designs have been developed to access the site via the northern site boundary (Option 1) or the southern site boundary (Option 2).

1.42 The northern (Option 1) junction is preferred as it at a point on the A465 where the main pedestrian / cycle connection to Abergavenny railway station and town centre is proposed. The southern (Option 2) junction provides the potential for a secondary access if required.

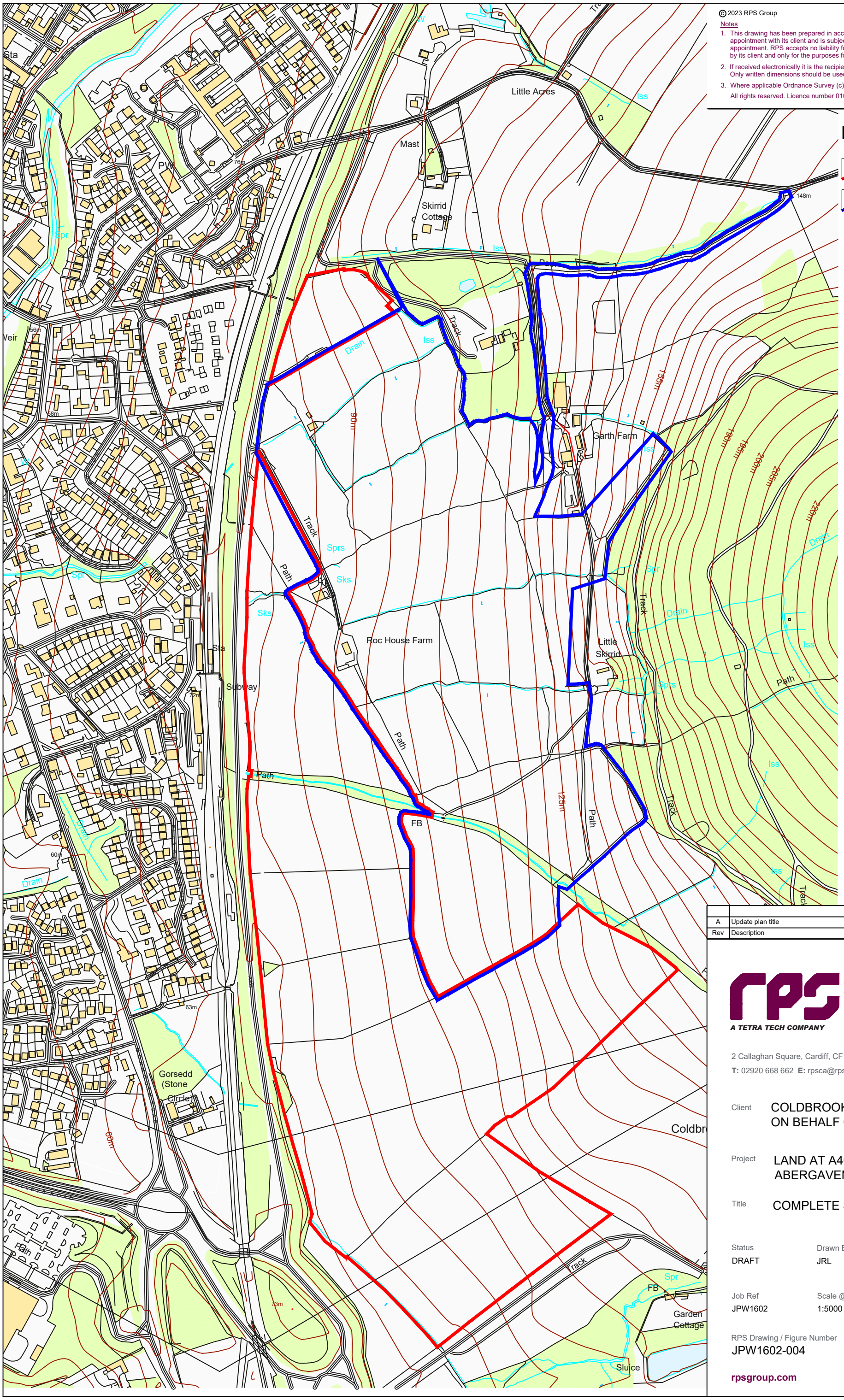
1.43 The development site benefits from excellent proximity to Abergavenny railway station. The railway footbridge will be the key pedestrian and cycle connection to link the development site to Abergavenny railway station and town centre.

1.44 A new footbridge will be required to connect the development site more effectively to Abergavenny railway station and the town centre. A schematic drawing has been developed detailing a new level access railway bridge connecting to the proposed access arrangements and pedestrian crossing on the A465. The potential railway bridge improvement includes the provision of lifts to provide accessible access to both railway platforms.

1.45 Network Rail are developing an a new fully accessible footbridge with lifts that will link platforms one and two. There is the potential for the development site to tie into the proposed footbridge in terms of a level connection to the western side of the A465.

Appendices

Appendix 1 – Land East of A465, Abergavenny Complete Site Plan



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

- RED LINE BOUNDARY
- CS0213 BOUNDARY

Rev	Description	By	CB	Date
A	Update plan title	PO	DP	20/01/23

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: COMPLETE SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	JRL	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	JAN-2023

RPS Drawing / Figure Number: JPW1602-004

Rev: A

rpsgroup.com

W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

Appendix 2 – Northern Access Arrangement Option 1

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

N

Sinks

Connection to proposed railway bridge

Proposed Toucan crossing

Shared footway/cycleway

Proposed Access

Abergavenny Station

SP

FB

ED Bdy

Path (um)

PRELIMINARY
NOT FOR
CONSTRUCTION

Scale 1:500

0 10 20 30 40

Key:

Nigel Jones Land (indicative)

See drawing JNY11641-RPS-0100-015A for swept path anaylsis

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Northern Signalised Access Aligned with Proposed Raiway Bridge

Rev	Description	By	CB	Date
A	Access relocated south	AJ	MSB	05/04/24

Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	28/03/2024

RPS Drawing/Figure Number: JNY11641-RPS-0100-014

Rev: A

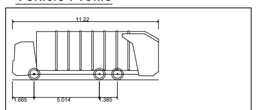
rpsgroup.com

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Vehicle Profile



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)	
Overall Length	11.220m
Overall Width	2.530m
Overall Body Height	3.756m
Min Body Ground Clearance	0.309m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	11.550m

Swept Path Key:



FOR INFORMATION ONLY

Based on drawing JNY11641-RPS-0100-014A layout

Rev	Description	By	CB	Date
A	Access relocated south	AJ	MSB	05/04/24

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Northern Signalised Access - Swept Path Analysis

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

RPS Drawing/Figure Number JNY116411-RPS-0100-015 Rev A

rpsgroup.com

Scale 1:500
0 10 20 30 40

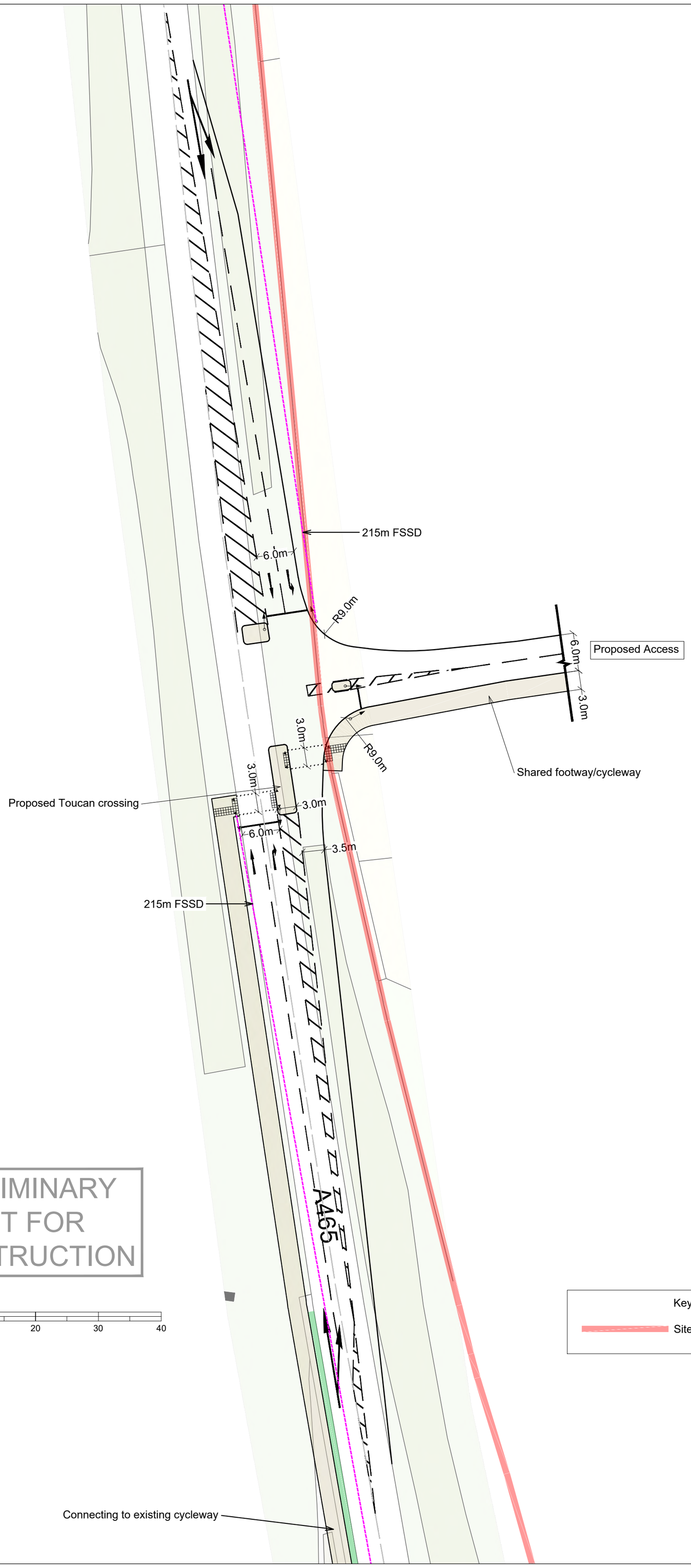
Appendix 3 – Southern Access Arrangement Option 2

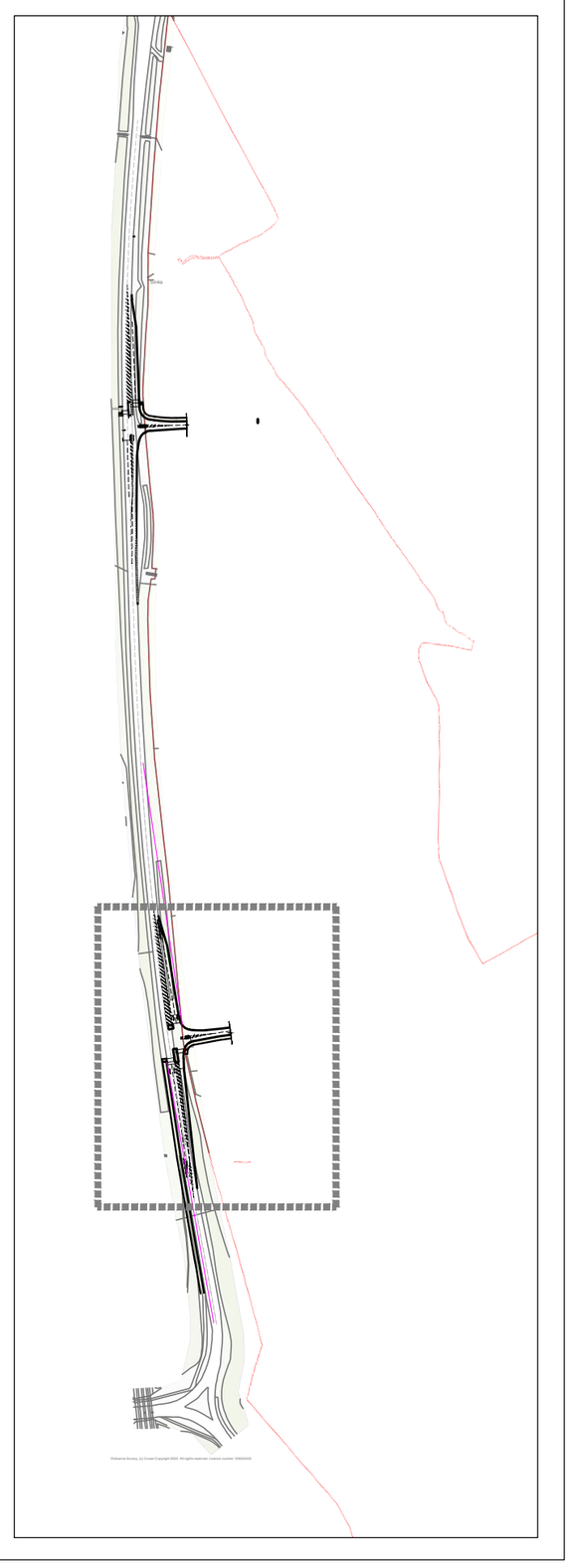
© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

N





PRELIMINARY
NOT FOR
CONSTRUCTION

Scale 1:500

0 10 20 30 40

Key:

Site boundary

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Southern Signalised Junction Access

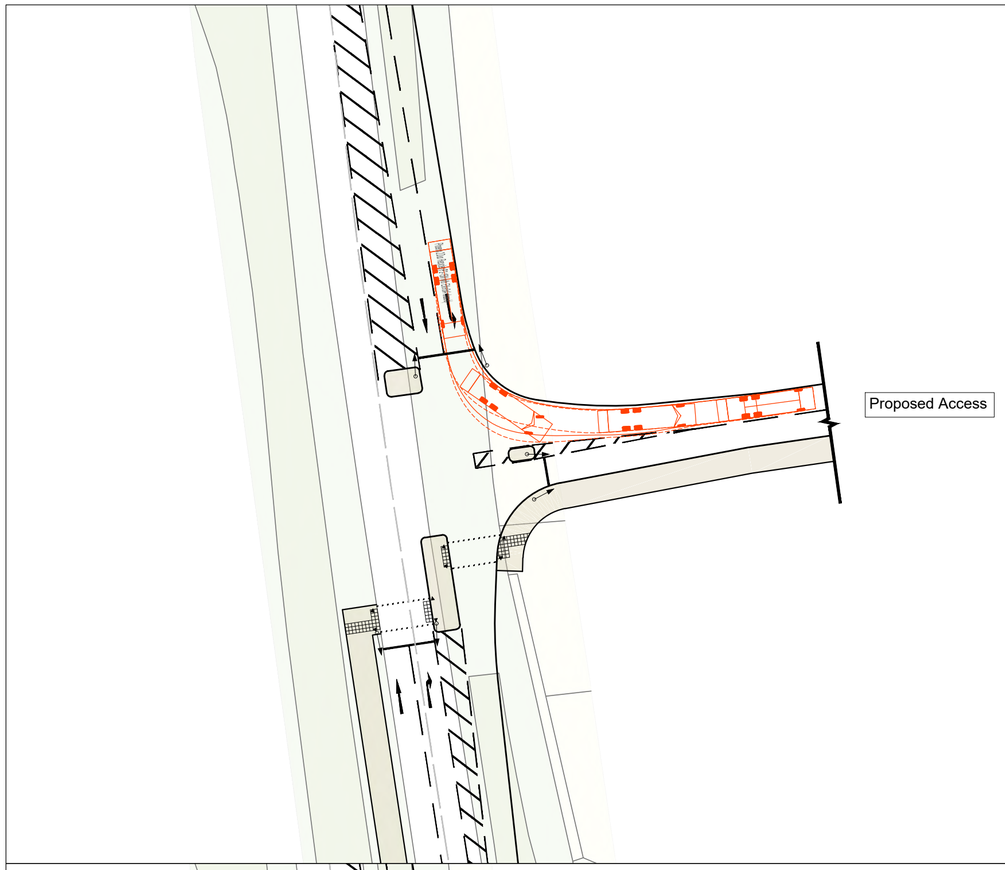
Rev	Description	By	CB	Date

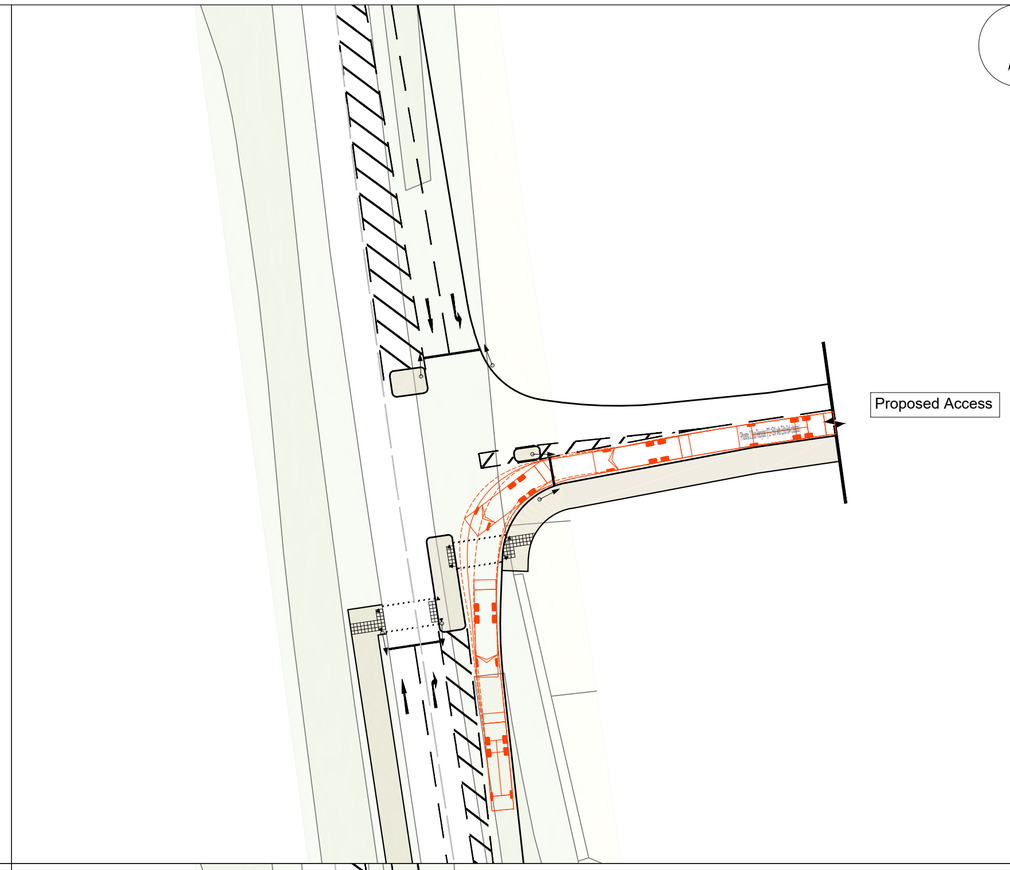
Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

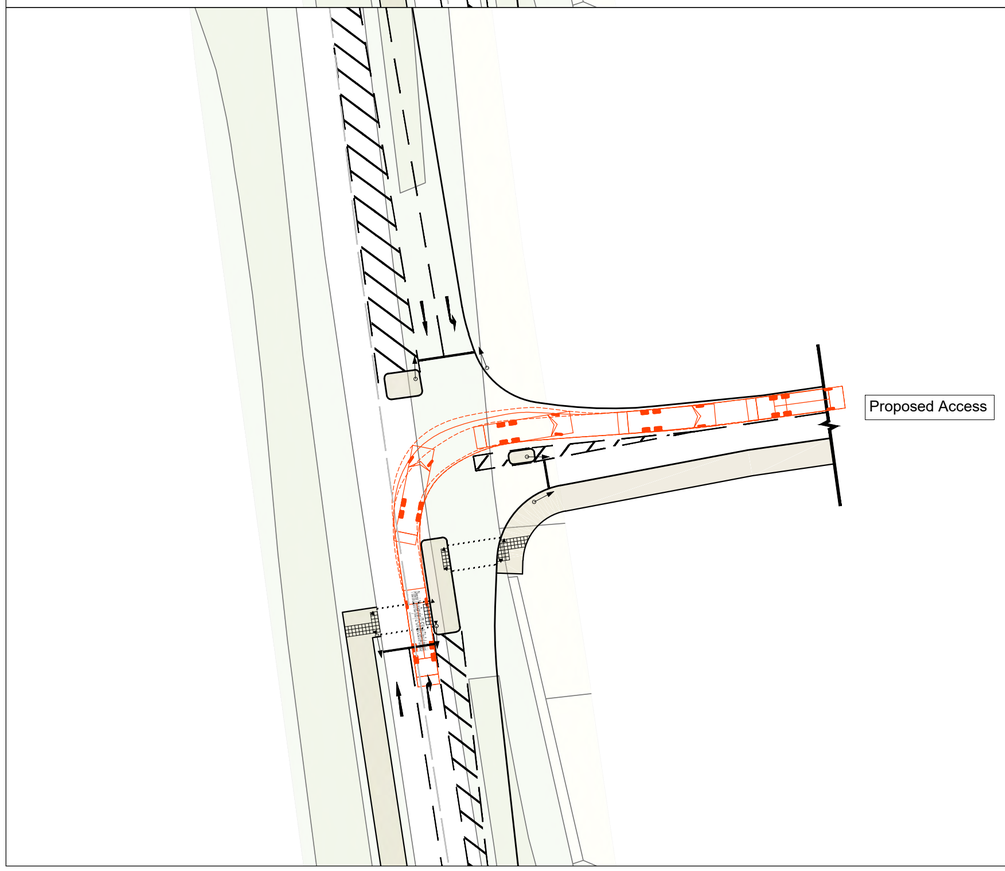
RPS Drawing/Figure Number
JNY11641-RPS-0100-007

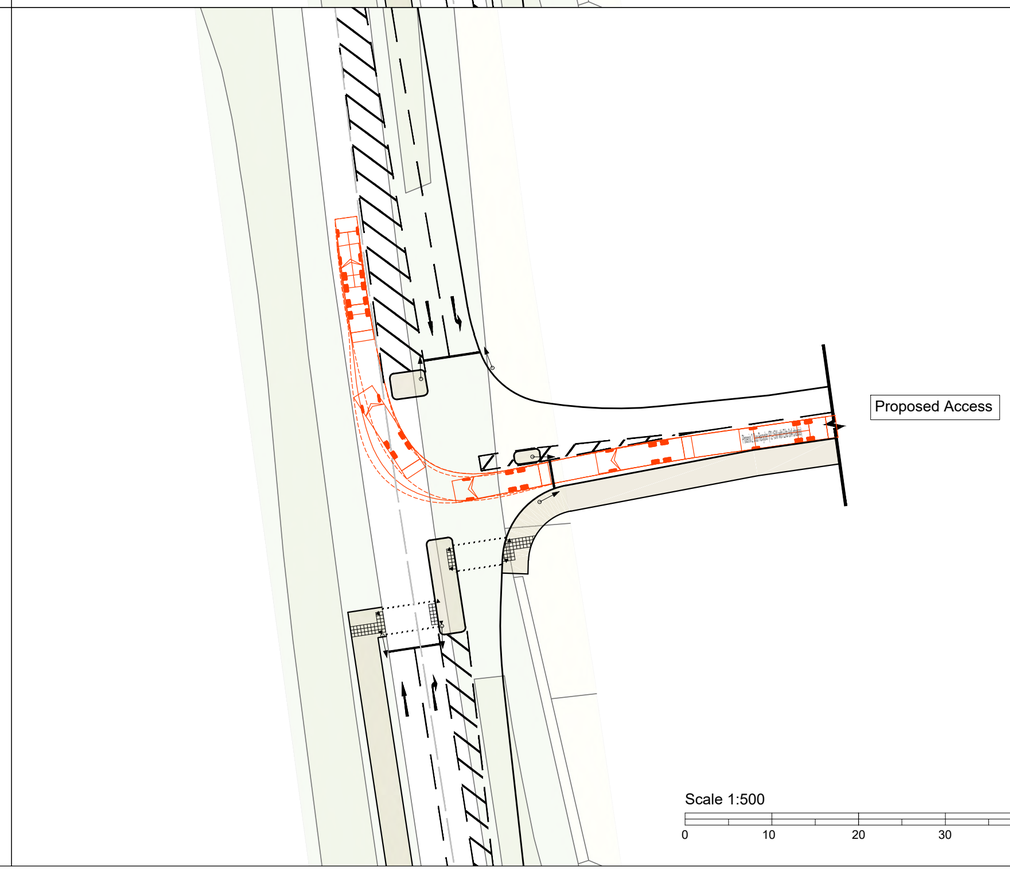
Rev

rpsgroup.com







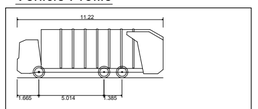


© 2019 RPS Group

NOTES

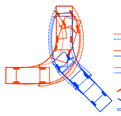
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Vehicle Profile



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)	
Overall Length	11.220m
Overall Width	2.530m
Overall Body Height	3.756m
Min Body Ground Clearance	0.309m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	11.550m

Swept Path Key:



- Body path
- Chassis path
- Wing mirror path
- Red=forward movement
- Blue=reverse movement

FOR INFORMATION ONLY

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Southern Signalised Access - Swept Path Analysis

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

RPS Drawing/Figure Number: JNY116411-RPS-0100-008

Rev

rpsgroup.com

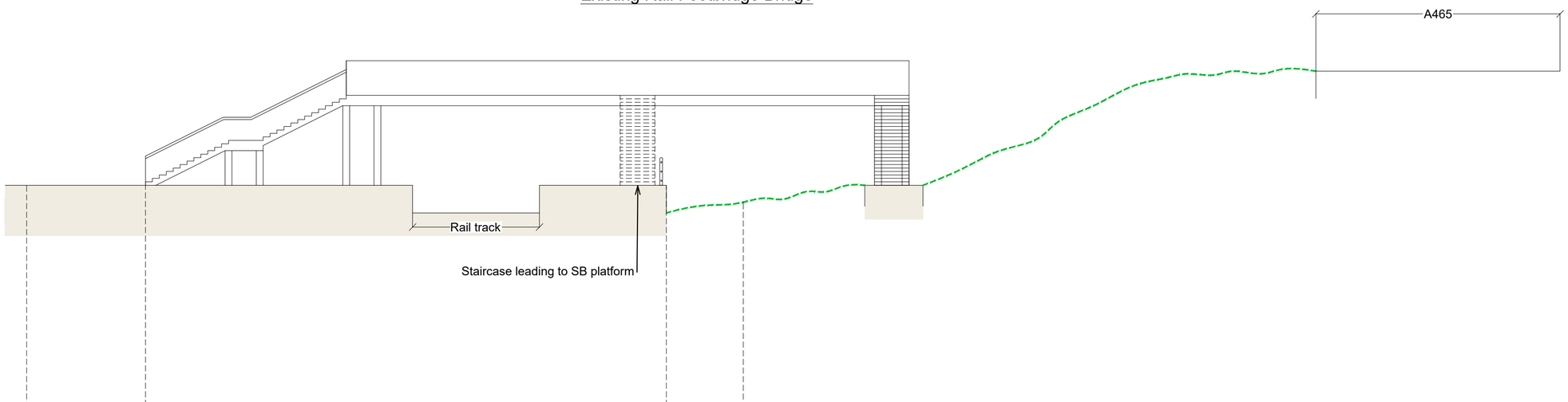
Appendix 4 – Potential Railway Bridge Improvement

© 2019 RPS Group

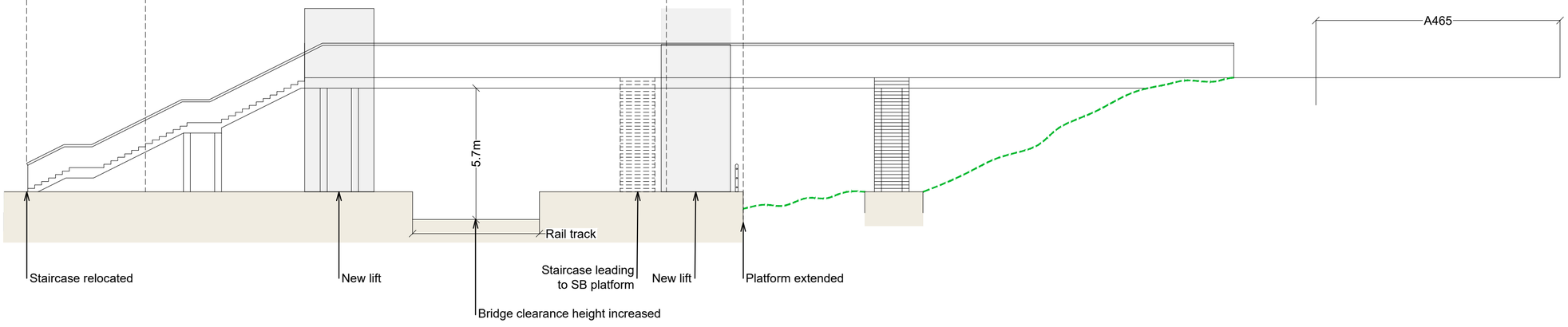
NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Existing Rail Footbridge Bridge



Proposed Rail Footbridge Bridge



Scale 1:150

0 5 10

PRELIMINARY NOT FOR CONSTRUCTION

This drawing has not been base any level information and is for Illustrative purposes only

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Abergavenny Rail Station
Illustrative Footbridge Proposals

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:150	13/03/2024

RPS Drawing/Figure Number
JNY116411-RPS-0100-011

Rev

rpsgroup.com

Appendix 3

MHA Highway Access Review

TECHNICAL NOTE

Project Title:	Monmouthshire Housing Association
Report Reference:	JNY11641-01a
Date:	28 November 2024

Land at Abergavenny – Monmouthshire Housing Association
Highway Access Review

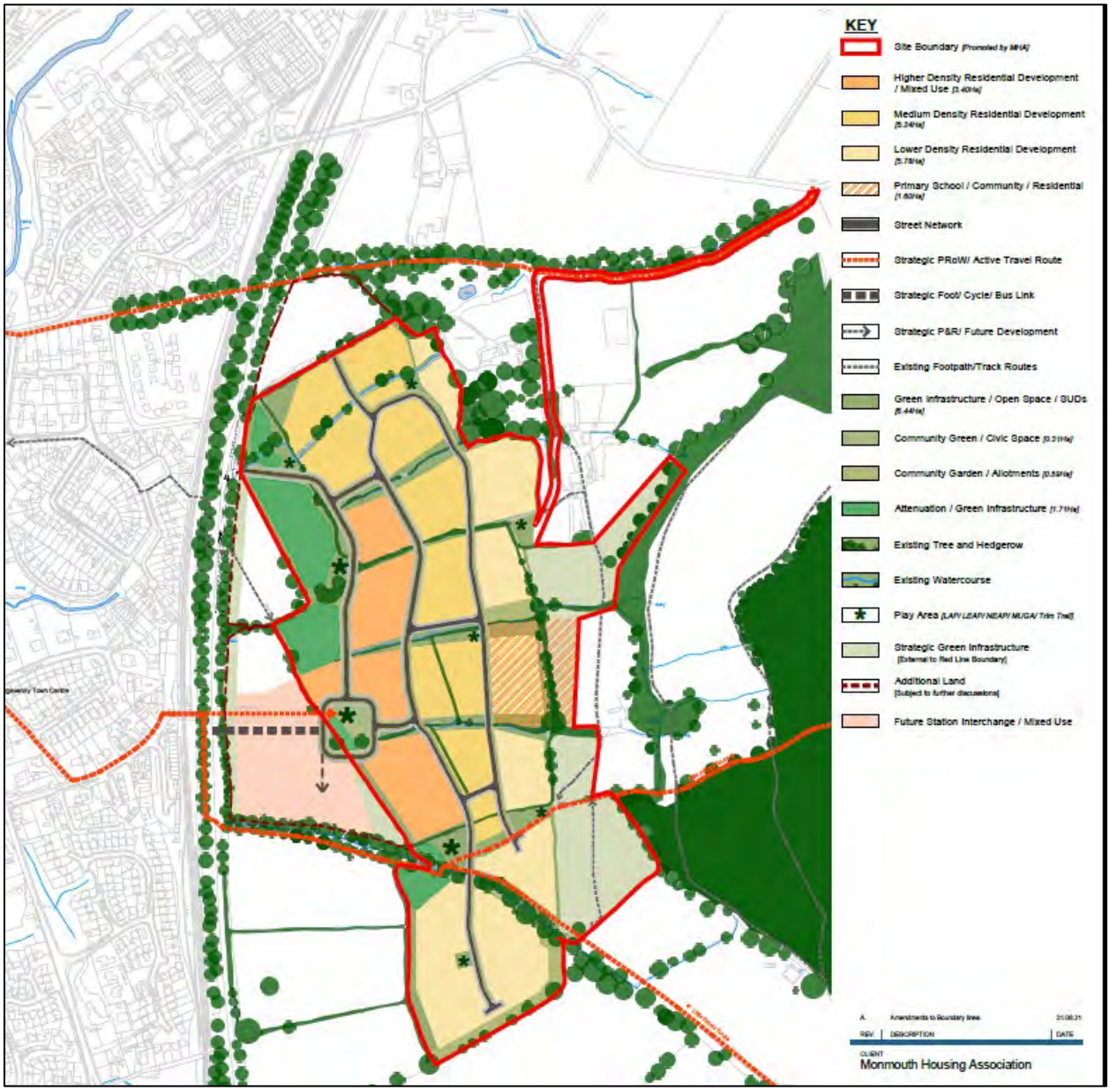
Introduction and Background

1.1 This note has been prepared on behalf of Trustees of the Coldbrook Estate to review the potential for highway access to the Monmouth Housing Association proposed residential development.

1.2 The site is located to the west of the A465 and runs parallel on a north / south alignment. It is advised that the site has the potential to accommodate circa 500 residential dwellings, primary school, and community facilities.

1.3 **Figure 1** details the initial masterplan for the site and the full masterplan is provided at **Appendix 1**.

Figure 1: Development Site

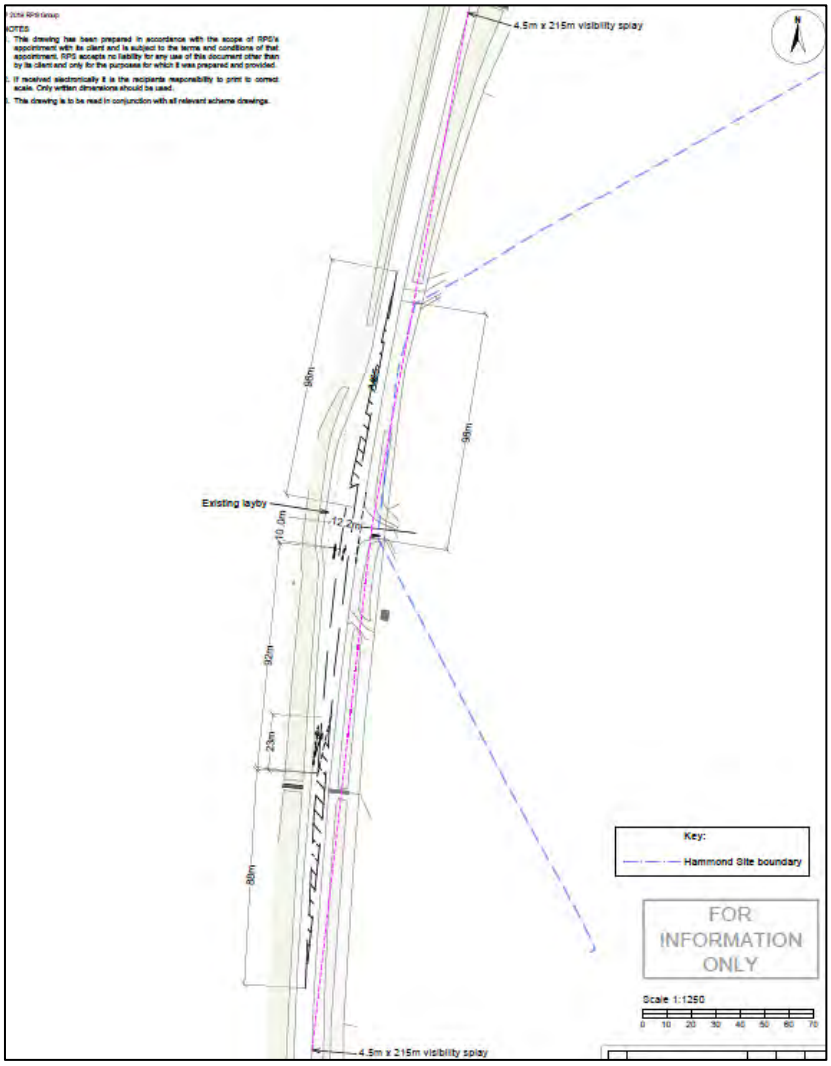


1.4 The site is served via a single point of vehicle access with the A465 located at the northwestern site boundary.

1.5 The masterplan indicates that the site has a limited site frontage of circa 100m with the A465. The masterplan details a priority junction with a 'Ghost Island' right turn lane to access the site. The priority junction is located at the southwestern extend of the frontage with the A465 in approximately the same position as an existing farm access.

1.6 It is understood that the access option detailed on the masterplan has had transport planning design input. The initial junction design has been traced by RPS from the masterplan onto OS mapping and is detailed in **Figure 2** and provided at **Appendix 2**.

Figure 2: Proposed Priority Junction Access



1.7 This note will provide an initial high-level of review of the proposed priority junction access arrangement and includes the following:

- Review the geometric requirements of potential access options and road safety considerations; and
- Review the potential for pedestrian and cycle connections to Abergavenny and the railway station.

Proposed Site Vehicle Access – Priority Junction

Junction Form and Road Safety Risks

1.8 The A465 is a two-way single carriageway road and subject to the National Speed limit (60mph) with no street lighting in the vicinity of the site.

1.9 A speed survey has been undertaken on the A465 to the south of the proposed site access. The results of the speeds are as follows based on the average 7 day 85th percentiles speeds:

- Northbound = 60.1mph
- Southbound = 64.5mph

1.10 The results of the speed survey indicate that the 85th percentile speeds are at the speed limit travelling northbound and exceed the speed limit travelling southbound. The high vehicle speeds are not surprising given the relatively straight alignment of the A465 and the lack of development on either side of the carriageway.

1.11 Given the high vehicle speeds a roundabout junction is considered the appropriate junction form to serve the site as it would provide a traffic calming effect and provide a safer access compared to the proposed priority junction. It does not appear possible to provide a roundabout junction to access the site, due to the limited frontage with the A465.

1.12 The proposed provision of a priority junction with a right turn lane raises the following road safety concerns due to the high-speed nature of the A465 in the vicinity of the site:

- **Road Safety Performance** – Priority junctions will usually have a higher collision rate and the severity of collisions will be more serious compared to a roundabout junction. The proposed priority junction will provide little traffic calming effect on the A465, apart from the provision of the tapers that form the right turn lane.
- **Turning Movement Risk** – The turning movements exiting the site and turning right into the site will need to cross the A465 with vehicles travelling at or above 60mph. Vehicles would need to judge suitable gaps in traffic to access and egress the site. There is a risk of vehicles being struck by A465 north and south bound traffic. The higher the vehicle speeds the higher the likely severity of any collision will be. The proposed single point of access via the priority junction would serve circa 500 residential dwellings, primary school and community facilities and introduce significant turning movements. The greater the level of development served via the priority junction , the greater the risk of higher severity collisions occurring.
- **Lack of nearside diverging taper** – The proposed junction design does not include the provision of a nearside diver taper (deceleration length) for vehicles turning left from the A465 into the site. Vehicles decelerating on the main A465 carriageway to turn left into the site, will reduce the capacity of the through carriageway by impeding following drivers. In addition, due to the high vehicle speeds there is the risk of high-speed rear end shunts occurring as vehicles slow to turn left. The provision of a nearside taper lane allows turning traffic to perform most of its deceleration off the main road. This improves junction capacity and safety performance. The requirement for a nearside diverging taper is set out in the Design Manual for Roads and Bridges CD123 Geometric design of at-grade priority and signal-controlled junctions. The site also includes employment development, and this could

attract larger HGV vehicle movements. This may also introduce the requirement for a nearside merging taper to allow HGVs to accelerate to join the A465.

1.13 The road safety issues associated with priority-controlled junctions on high-speed roads are well known to road safety engineers. Historic priority junctions with right turn arrangements have been identified as collision sites and require collision mitigation schemes to address safety problems. Collision reduction schemes can include removing priority arrangements and replacing them with a new roundabout.

Speed Reduction Measures

1.14 To reduce the risks associated with the proposed priority junction will require the existing high vehicles speeds on the A465 to be reduced to a more acceptable level.

1.15 The site will need to reduce the existing vehicle speeds on the A465 and the provision of a 40mph or 50mph speed limit could be considered. The introduction of the proposed development on the eastern side of the A465 would change the character of the A465 from rural to more urban to a certain extent. However, the change of character of the A465 would be constrained by the limited site frontage of the site.

1.16 A reduction of the existing speed limit on the A465 is unlikely to result in significantly reduced vehicle speeds unless the character of the road changes or traffic calming measures are put in place to physically reduce vehicle speeds.

1.17 Any changes to the existing speed limit on the A465 will require a traffic regulation order and will need to be agreed with the Highway Authority and Police.

Existing Layby

1.18 The proposed priority junction with right turn lane to access the site is located adjacent to an existing lay by, located on the western side of the A465. The proposed site access takes no account of the existing layby. The layby position and existing farm access is shown in **Figure 3**.

Figure 3: Existing A465 Layby



1.19 The provision of the proposed priority junction adjacent to the existing layby introduces the potential for conflict and confusion between vehicles accessing the layby and the proposed site. The Design Manual for Roads and Bridges CD 169 'The design of lay-bys, maintenance hardstanding's, rest areas, service areas and observation platforms' indicate that laybys should be located 375m away from junctions.

1.20 The current position of the existing access would preclude the provision of a priority junction to serve the site. The layby would need to be relocated to a suitable location as part of the highway design.

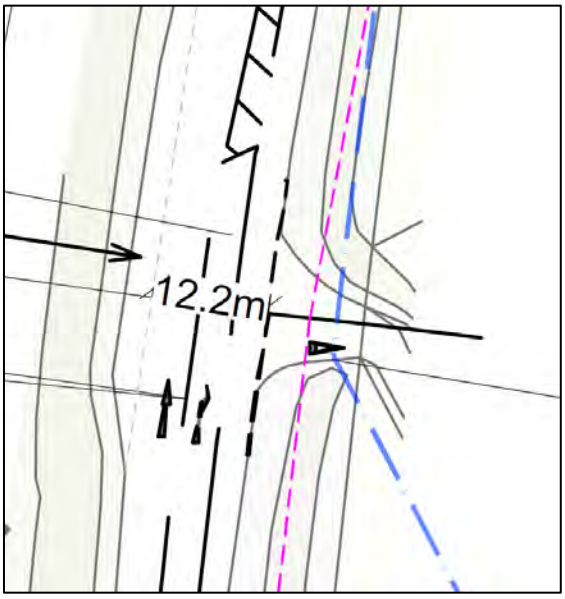
Junction Location

1.21 The proposed priority junction is located at the very southern section of the site frontage with the A465. The access design taken from the masterplan does not include the proposed access design and junction radii.

1.22 It appears that the site access will potentially encroach on land to the south of the site boundary when the proposed access width and junction radii is considered. This land forms part of the proposed Land at A465 site, detailed on the concept masterplan prepared by Pegasus.

1.23 The potential for encroachment and proximity to the Land at A465 site is shown in **Figure 4.**

Figure 4: Proposed Priority Junction Located at Southern Extent of Site Frontage with A465



1.24 The access location does not appear to be within the land ownership as currently drawn and would need to be moved further to the north to provide room for the access width and junction radii.

Potential for Alternative Access Arrangements

Roundabout Access

1.25 In terms of road safety, the provision of priority junction with right turn lane has the potential to introduce known road safety problems. The provision of a roundabout junction would result in a safer form of junction to access the site for the following reason:

- A roundabout provides a significant traffic calming effect and reduces vehicle speeds at the point where vehicles would be accessing the development. The design requirement for the roundabout ensures that vehicle speeds entering the roundabout unopposed, will be a maximum of circa 30mph. Therefore, the reduced vehicle speeds at a roundabout junction would result in reduced collision severity, compared to a priority arrangement.

1.26 The site has limited site frontage of circa 100m with the A465. The lack of site frontage effectively prohibits the ability to access the site via roundabout junction. The roundabout would need to be developed to the east of the A465 alignment to achieve suitable entry deflection requirements. This would result in the stopping sight distance in the southbound approach to the give way line encroaching on land outside the control of the development. This design factor is likely to have resulted in the choice of a priority junction to access the development, as a roundabout junction is not geometrically possible in this location.

Signal Control Junction

1.27 The provision of a traffic signal control junction arrangement is considered potentially more achievable than a roundabout access to serve the site. However, the most significant disadvantage of traffic signals will be their impact on the A465 compared to a roundabout. The separate staging of vehicle movements via signal control will introduce delay on the A465. In addition, the existing vehicle speeds would need to be reduced to allow a signal arrangement to be an effective option.

Summary

1.28 The proposed priority junction with right turn lane to serve the site does not appear to be deliverable as currently detailed on the master plan for the following reasons:

- Road Safety Risks – Turning movements on a high-speed road;
- The existing layby position has not been taken account of and would prevent access in the location shown; and
- The site access encroaches on third party land.

1.29 The provision of a roundabout would be the preferred option in terms of providing safe access arrangement and reducing vehicle speeds on the A465.

1.30 The site has limited site frontage of circa 100m with the A465. The lack of site frontage effectively prohibits the ability to access the site via roundabout junction.

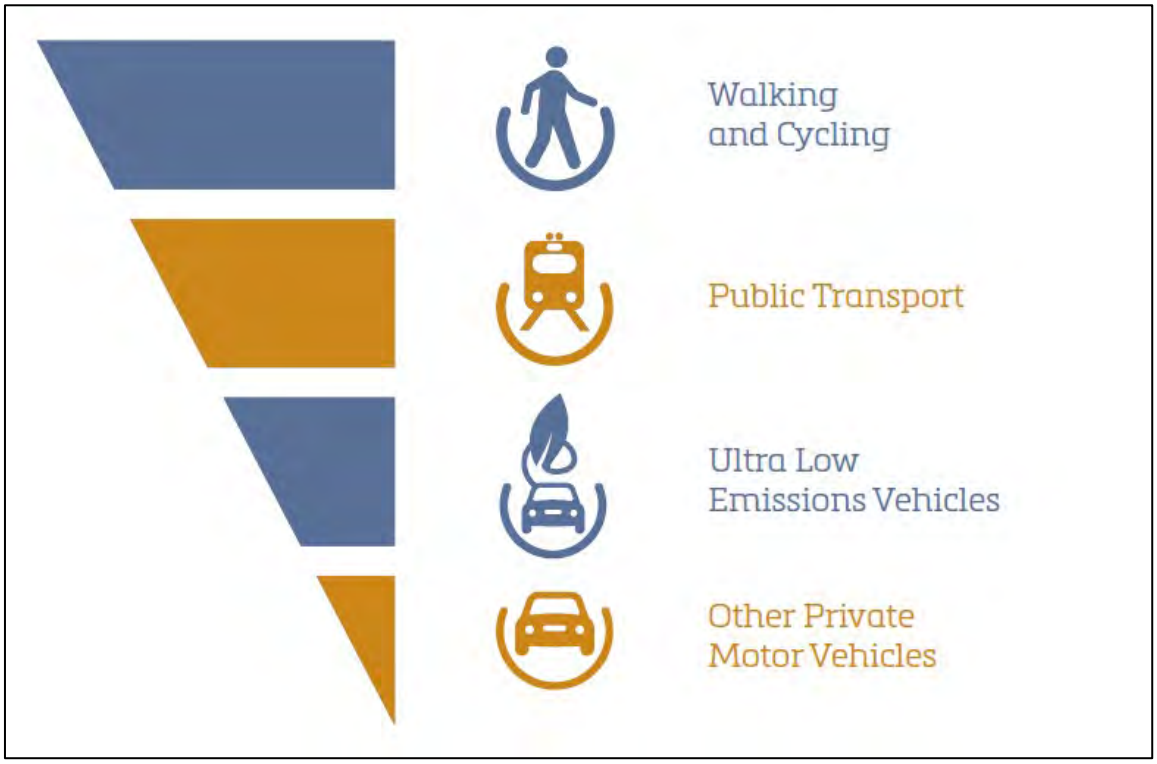
1.31 The provision of a traffic signal-controlled junction could be considered to serve the site. However, the provision of signals would introduce additional delay on the A465 and would also likely require the existing high vehicle speeds to be reduced.

Pedestrian and Cycle Connections to Abergavenny and the Railway Station

1.32 The proximity of the site to Abergavenny Railway Station and the town centre offers the potential to maximise opportunities for a mode shift to more sustainable forms of transport and offers an opportunity for transit-orientated development.

1.33 Planning Policy Wales (PPW) Edition 11 (2021) details at Figure 9: The Sustainable Transport Hierarchy for Planning within the Policy document shows the hierarchical approach to reduce vehicle trips and is replicated below.

Figure 5: PPW 12: The Sustainable Transport Hierarchy for Planning



1.34 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations and support the delivery of schemes located, designed, and supported by infrastructure which prioritises access and movement by active and sustainable transport.

1.35 The sites strategic pedestrian / cycle / bus connection to the west of the site is not deliverable, without the use of land that comprises the southern Land at A465 development site. The site therefore not integrated with sustainable transport and does not provide suitable active travel connections to the local facilities in Abergavenny and is at odds with the PPW 12 Sustainable Transport Hierarchy.

1.36 The proposed vehicle access to the site does not include the provision of any pedestrian facilities. The master plan promotes a strategic pedestrian / cycle / bus connection to the west of the site that links to the railway footbridge. This will be the key pedestrian and cycle connection to encourage active travel and to link the site to Abergavenny railway station and town centre.

1.37 This connection is detailed in an extract of the masterplan provided at **Figure 6.**

Figure 6: Site – Strategic Pedestrian / Cycle / Bus Connection



1.38 The above connection is outside of the site red line boundary and would be reliant on the Land at A465 site to deliver.

1.39 The Land at A465 development site provides better options for connectivity to Abergavenny town centre and railway station. The southern site would also maximise the opportunities for sustainable transport by providing a strong pedestrian and cycle connection to the railway bridge and locating the transport hub (Park and Ride) and vehicle access in the same location.

1.40 The site masterplan also details a connection to Public Right of Way (PRoW) 352/12/2 that crosses the railway line via an uncontrolled at grade pedestrian crossing. The PRoW then connects to Hollywell Crescent via a very narrow path between properties 67 and 72. This PRoW connection is not considered suitable to connect the site to Abergavenny. The railway crossing may need to be closed if footfall increases. Network Rail's long-term strategy is to enhance crossing safety by managing and mitigating the risk at crossings. The most effective management tool available to Network Rail to eliminate risk is to close crossings.

1.41 The site could include pedestrian and cycle facilities via their frontage and proposed site access with the A465 and then connect via a crossing to the western side of the A465. However, the existing high speeds on the A465 do not provide conducive conditions for pedestrians or cyclists to route adjacent to the carriageway.

1.42 The provision of a stand-alone signalised crossing would also be required to connect to the existing railway footbridge that provides access to the railway station and town centre. The existing high vehicle speeds on the A465 would also prohibit the provision of such a crossing and

the speed limit would need to be reduced to 50mph. Alternatively, a structure could be provided to cross the A465 and railway line, however, this option would be expensive and unsightly.

1.43 Planning Policy Wales (PPW) Edition 11 (2021) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. Chapter 4 Active and Social Places details the policies in relation moving within and between places and Transport.

1.44 The active and social theme details the following aim at paragraph 4.0.3 in relation to the creating of sustainable development:

> **"4.0.3 This theme aims to ensure new development is located and designed in a way which minimises the need the travel, reduces dependency on the private car and enables sustainable access to employment, local services, and community facilities. This will be achieved through integrating development with sustainable transport infrastructure and designing schemes in a way which maximises provision and use of sustainable forms of travel, including prioritising these modes over the private car."**

1.45 The sites pedestrian and cycle connection to Abergavenny railway station and town centre is not deliverable, without the use of land that comprises the southern Land at A465 development site. The site therefore not integrated with sustainable transport and does not provide suitable active travel connections to the local facilities in Abergavenny.

Summary

1.46 The proposed pedestrian / cycle connections from the site would only be deliverable via the land outside of their red line boundary (southern site). Pedestrian and cycle facilities that route alongside the high speed A465 would not provide a conducive environment for pedestrians.

1.47 Therefore, the opportunities for effective pedestrian and cycle connections appear to be limited and is at odds with the PPW 12 Sustainable Transport Hierarchy. Co-operation with the proposed southern Land at A465 development site is recommended.

Appendices

Appendix 1 – Site Masterplan

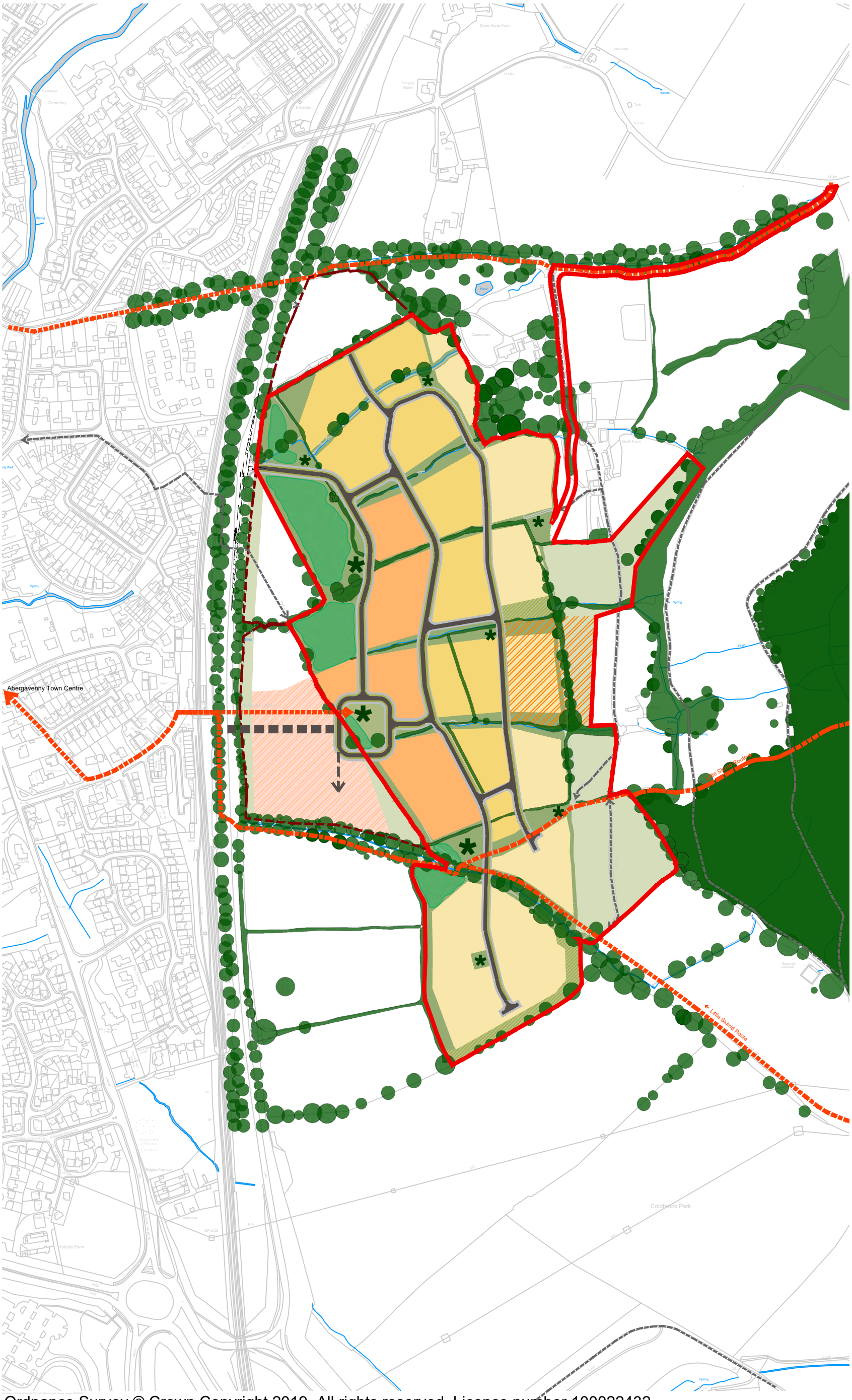
LAND EAST OF ABERGAVENNY
LDP CANDIDATE SITE

Scale 1:5000

0 50 100 150 200 250 500 750

N

LAND USE FRAMEWORK PLAN



KEY

- Site Boundary *[Promoted by MHA]*
- Higher Density Residential Development / Mixed Use *[3.40Ha]*
- Medium Density Residential Development *[5.24Ha]*
- Lower Density Residential Development *[5.78Ha]*
- Primary School / Community / Residential *[1.60Ha]*
- Street Network
- Strategic PRoW/ Active Travel Route
- Strategic Foot/ Cycle/ Bus Link
- Strategic P&R/ Future Development
- Existing Footpath/Track Routes
- Green Infrastructure / Open Space / SUDs *[6.44Ha]*
- Community Green / Civic Space *[0.31Ha]*
- Community Garden / Allotments *[0.59Ha]*
- Attenuation / Green Infrastructure *[1.71Ha]*
- Existing Tree and Hedgerow
- Existing Watercourse
- Play Area *[LAP/ LEAP/ NEAP/ MUGA/ Trim Trail]*
- Strategic Green Infrastructure [External to Red Line Boundary]
- Additional Land [Subject to further discussions]
- Future Station Interchange / Mixed Use

REV.	DESCRIPTION	DATE
A.	Amendments to Boundary lines.	31.08.21

CLIENT
Monmouth Housing Association

JOB TITLE
Abergavenny Extension

DRAWING TITLE
Land Use Framework Plan

SCALE @ A3	DATE	DRAWN BY
1:5000	August '21	KE
JOB NO.	DRAWING NO.	REVISION
1909	LUF-01	A

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Limited 2020
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

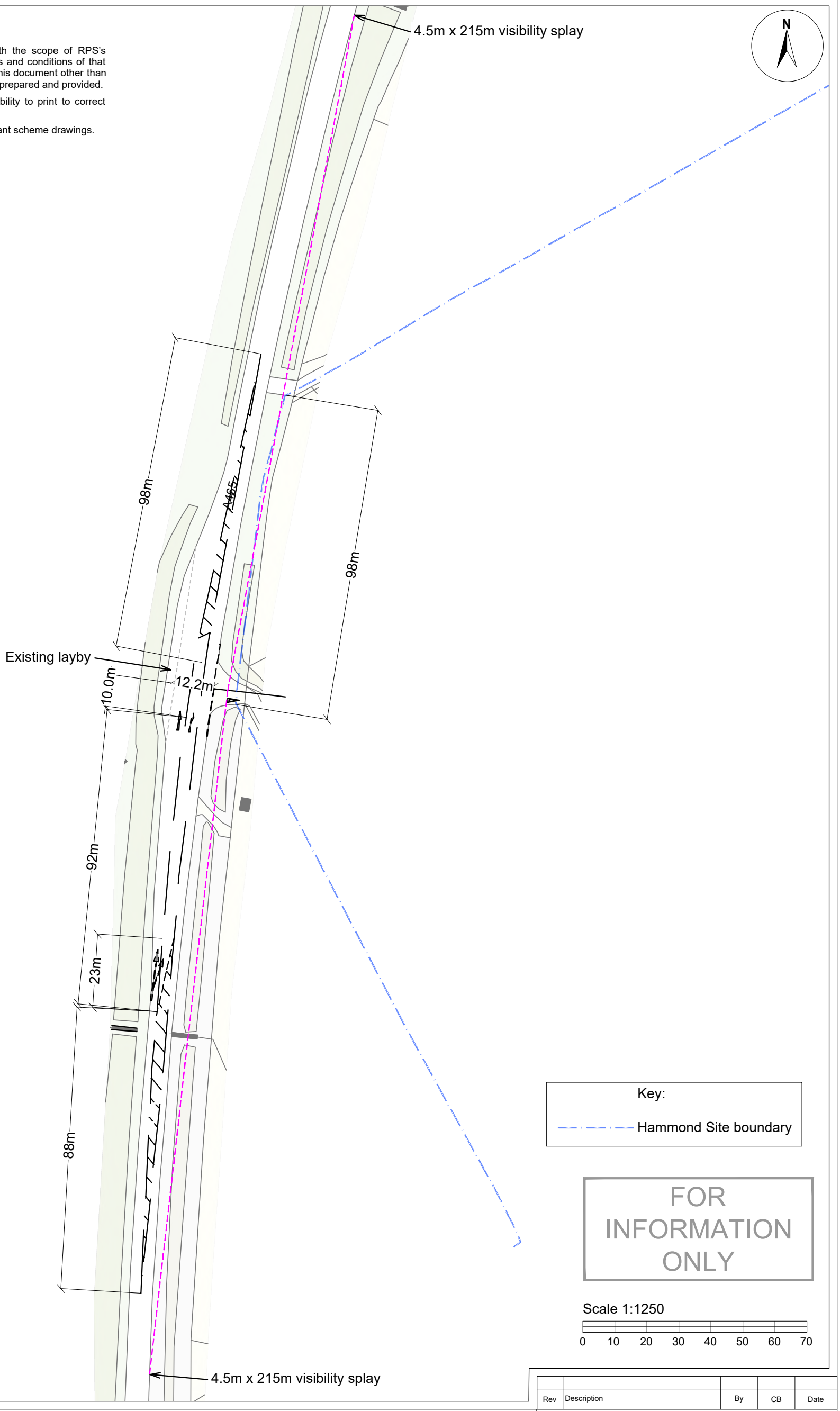
Ordnance Survey © Crown Copyright 2019. All rights reserved. Licence number 100022432

Appendix 2 – Site Proposed Access Arrangement Sketch

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.



Rev	Description	By	CB	Date

MAKING COMPLEX EASY
A TETRA TECH COMPANY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Access to Hammond Site

Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A3**	**Date Created**
JNY11641	1:1250	27/04/2023

RPS Drawing/Figure Number
JNY11641-RPS-0100-005

Rev
-

rpsgroup.com

Drawing Ref: P:\JNY11641 - Abergavenny\Drawings\JNY11641-RPS-0100-005.dwg

Appendix 4

High Level Drainage Strategy

ABERGAVENNY: INITIAL DRIANAGE CALCULATIONS

Date: 27 March 2024
From: Tamsin Jones
Pages: 15 inc. this page
Regarding: Land east of A465, Abergavenny

6-7 Lovers Walk
Brighton, East Sussex BN1 6AH
T +44 1273 546 800

Dear Sirs,

RPS Consulting Services Ltd (RPS) were commissioned to provide flood risk support for the proposed residential led development to be located at Land east of A4646, Abergavenny, Wales. The proposed site is situated across an approximately 63-hectare parcel of land.

This technical note aims to provide details of the potential flood risk at the site and determine anticipated drainage requirements. The below is to be used to inform the Green Infrastructure Plan which is being developed by RPS and supporting consultants.

Site Background

Site Description

The site is located to the east of the A4645 in Abergavenny, Wales at Grid Reference SO 30829 13783 and is irregular in shape. The site is currently 100% soft landscaping formed of agricultural fields. Potential vehicular access points are indicated to be to the A4645 to the west of the site and to the northeast via an existing farm track which connects to the B4233. Abergavenny train station is adjacent west of the site.

A site location plan is included in Appendix A. The proposed site boundary includes both the red and blue outlines.

Topography

No Topographical survey is available for the site. As such LiDAR data (1m resolution, dated 2006) has been used to establish the topography at the site. The site slopes in a westerly direction, the highest elevations in the east are approximately 159m AOD, with the lowest elevations along the western boundary reaching approximately 77m AOD. The access track in the northeast is highest in the northeast at 148m AOD to 122m AOD where it meets the main site boundary. The LiDAR identifies numerous drains in the centre and north running in a westerly direction in the centre, shown by the lower elevations. A drain is also present in LiDAR in the southwest of the site.

A LiDAR map for the site is included in Appendix B. It should be noted that LiDAR data has an error margin of +/- 150 mm.

Geology

British Geological Survey (BGS) online mapping (1:50,000 scale) indicates that the site is located on superficial deposits of Till Devensian formed of Diamicton across the majority of the site. The south is situated on Glaciofluvial Deposits, Devensian formed of sand and gravel. The bedrock geology across the site is St Maughans Formation formed of argillaceous rocks and sandstone, interbedded.

BGS mapping identifies the bedrock geology and superficial deposits are classified as having ‘medium vulnerability, secondary aquifer’ in the west, with the east classified as ‘high vulnerability, secondary aquifer.’

Numerous boreholes are located within a 10m radius to the west of the site. No water was struck in any of the records. The deepest of these records; SO31SW11, was advanced 7.62m below ground level (bgl).

According to Natural Resources Wales the site is not located in a Source Protection Zone.

Flood Risk

Watercourses

A number of small watercourses are identified with the site boundary. These are illustrated on Figure 1. The map is also included in Appendix C.

In the centre two watercourses traverse the centre of the site before converging into one drain and continuing in a westerly direction. This watercourse eventually discharges into the River Usk approximately 450m west of the site. A small watercourse/drain flows through the north of the site, with a watercourse/drain running along the southwest. These watercourses are also hydraulically connected to the River Usk.

Culverted sections of the watercourse run to the wets of the site boundary through a residential area of land.

Date: 27th March 2024
Regarding: Abergavenny

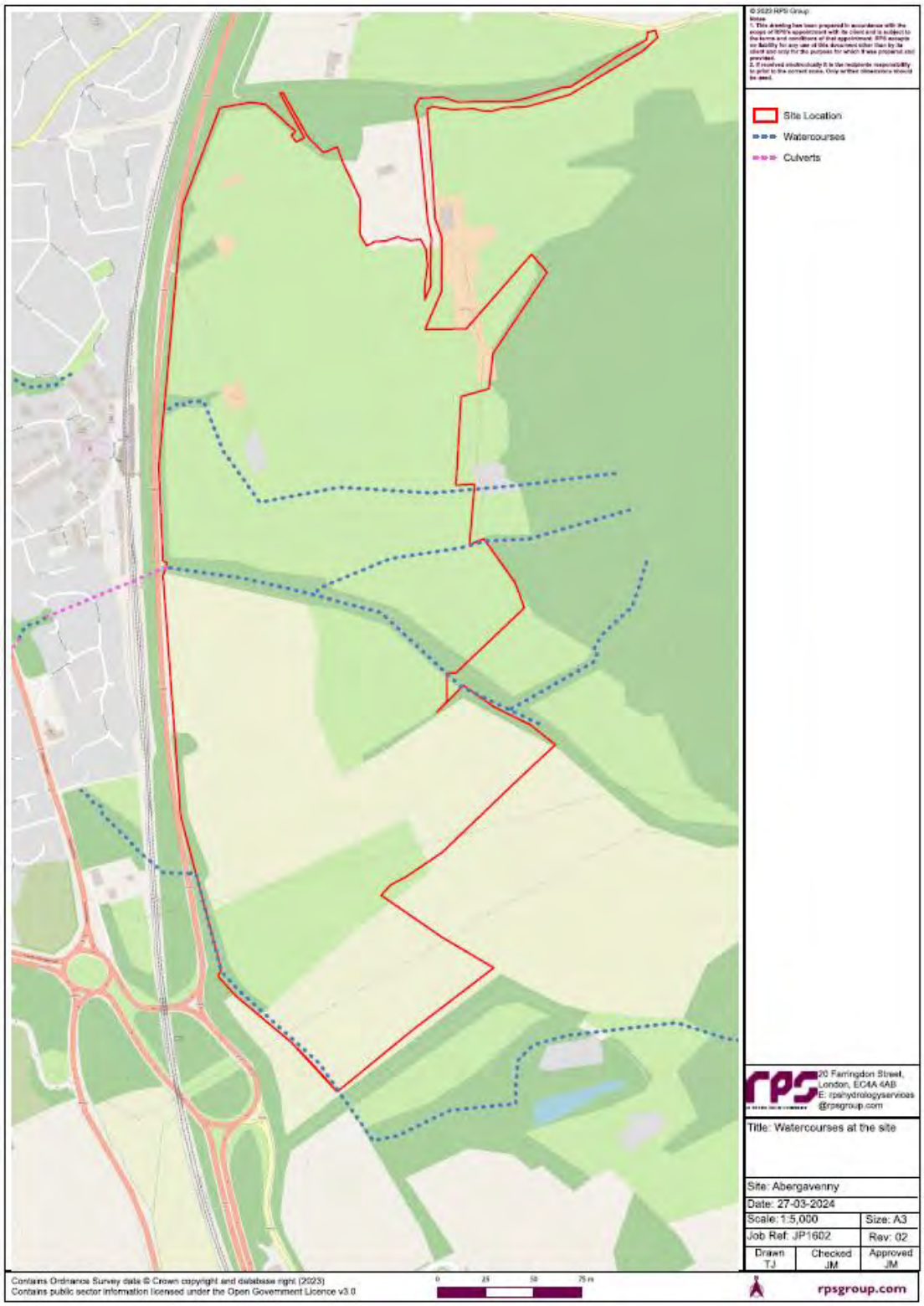


Figure 1. Watercourses on site and in proximity

Date: 27th March 2024
Regarding: Abergavenny

River and Coastal/Tidal Risk

According to the NRW Development Advice Map the site is located in Zone A, land assessed as having little or no risk of fluvial or coastal/tidal flooding.

The Flood Map for Planning has no official status until the adoption of the new TAN15 (anticipated in 2024), however, given the time likely to elapse between this report and submission of any planning application it has been assessed. In accordance with the NRW Flood Zone Mapping the site is situated in Flood Zone 1, the site is assessed as having a less than 1 in 1000-year chance of river and coastal/tidal flooding in any given year (0.1% Annual Exceedance Probability (AEP)) including an allowance for climate change.

Historical flooding has occurred from the River Usk in 1979 which impacted Abergavenny. The historical flood extended approximately 330m west of the site. No historical flooding has been identified at the site according to NRW.

The risk from rivers and coastal/tidal risk is **low.**

Surface Water and Small Watercourses

According to NRW National Flood Hazard and Risk Maps most of the site is at a very low risk of flooding from surface water and small watercourses. Isolated areas of the site are at a low to high risk. There is an area of risk associated with a small watercourse in the north of the site. Isolated areas of low to high risk are also present in the west associated with topographical depressions.

The risk categories pertain to the following probabilities of flooding:

- Low Risk – Land assessed as having a less than 1 in 1000-year risk of flooding (0.1% AEP);
- Medium Risk - Land assessed as having a less than 1 in 100-year risk of flooding (1% AEP); and,
- High Risk – Land assessed as having a less than 1 in 30-year risk of flooding (3.3% AEP).

Velocities during a low-risk scenario are less than 1m/s, flows are in a westerly direction towards the lowest elevations at the site.

The updated Flood Map for Planning shows the extent of Flood Zone 2 and Flood Zone 3 largely matches that of the current areas of low to high risk. The small watercourse in the north is categorised as Flood Zone 2/3, along with the topographical depressions in the west. The risk categories pertain to the following probabilities of flooding:

- Flood Zone 1 - Areas with a 1 in 1000 to 1 in 100 chances of flooding from surface water and/or small watercourses in a given year (0.1% to 1%), including the effects of climate change;
- Flood Zone 2 - Areas with a 1 in 1000 to 1 in 100 chance of flooding from surface water and/or small watercourses in a given year (0.1% to 1%), including the effects of climate change; and,
- Flood Zone 3 - Areas with more than a 1 in 100 chance of flooding from the sea in a given year (1% AEP), including the effects of climate change.

As mentioned, there are a number of small watercourses/drains present at the site, which may pose a risk to the site.

The risk is isolated and confined to small areas of the site. As such the overall risk is deemed **low**.

Date: 27th March 2024
Regarding: Abergavenny

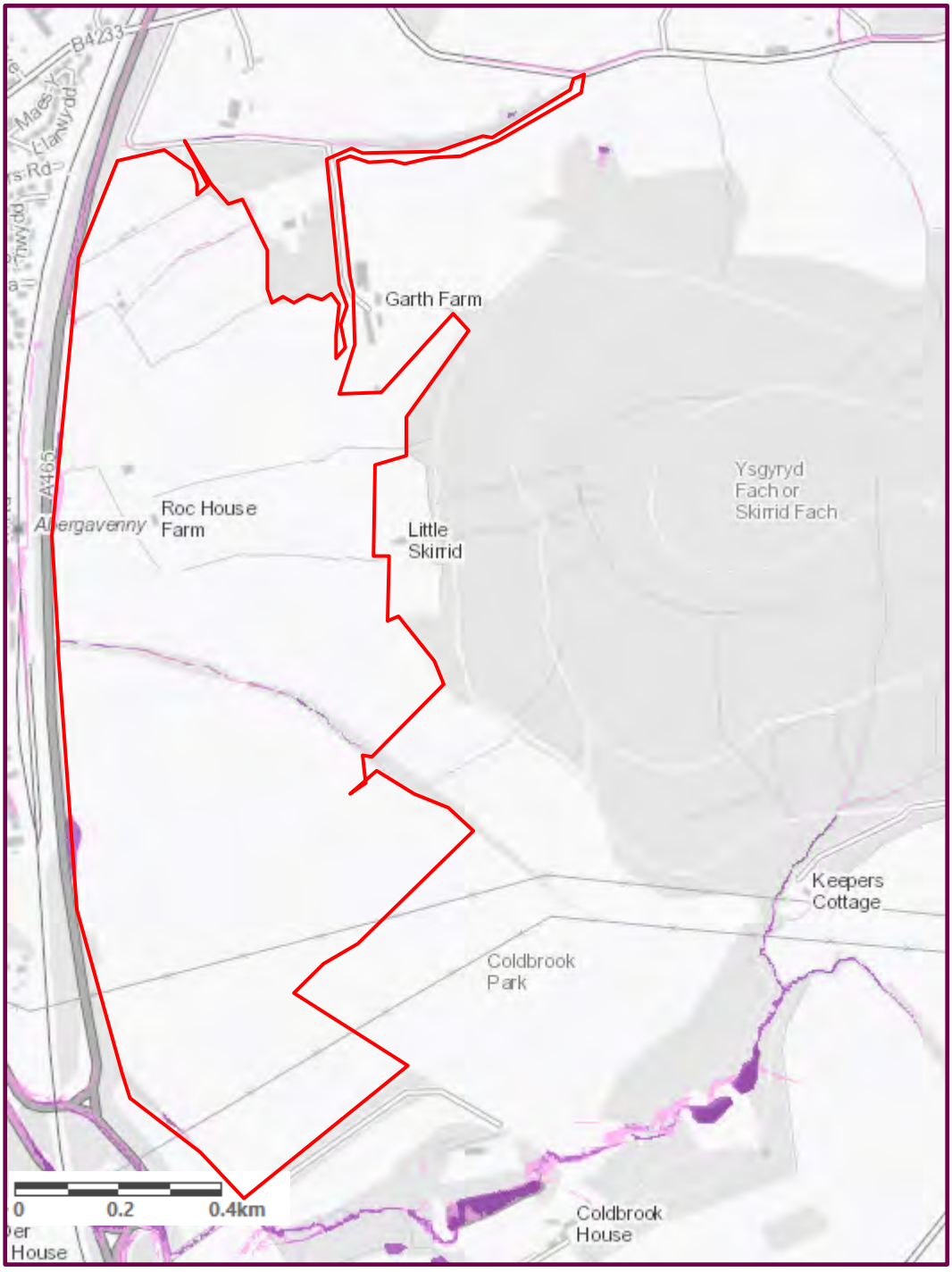


Figure 2. Risk from Surface Water and Small Watercourses Extent

Groundwater

This can occur in low-lying areas when groundwater levels rise above surface levels, or within underground structures. BGS mapping indicates that the site is underlain by Till Devasian and Glaciofluvial Deposits.

The underlying strata is considered to be permeable, therefore, the site is partially susceptible to groundwater flooding. However, no groundwater was encountered in any of the borehole records near to the site.

The overall risk is considered **low.**

Other Sources

There is a limited risk of flooding occurring as a result of a break in a water main. No water mains are likely at the site given its rural nature. No reservoirs, canals and other artificial structures are identified at or in proximity to the site.

The overall risk is considered **low.**

Proposed Development

The site is to be developed for residential use, the density and layout is not finalised at this stage.

As such we have made assumptions regarding the layout and anticipated impermeable area to provide some initial calculations for attenuation storage.

The site has been split into four primary catchments. The catchments all fall to the west, and have been split based on the watercourses on site. The catchments and anticipated flow directions based on topography are presented in Figure 3 below.

The north is proposed for residential use, with a transport hub likely to be incorporated in to plans to connect the site to Abergavenny train station. Based on initial design it is estimated that 40% of this area will comprise impermeable area. The south is to comprise of residential use, with a school potentially proposed in the east. Based on initial design it is estimated that 40% of this area will comprise impermeable area.

Urban creep of 8% has been applied to the residential areas as the anticipated density of homes is to be greater than 30dp per ha. The anticipated impermeable areas are shown in Table 1.

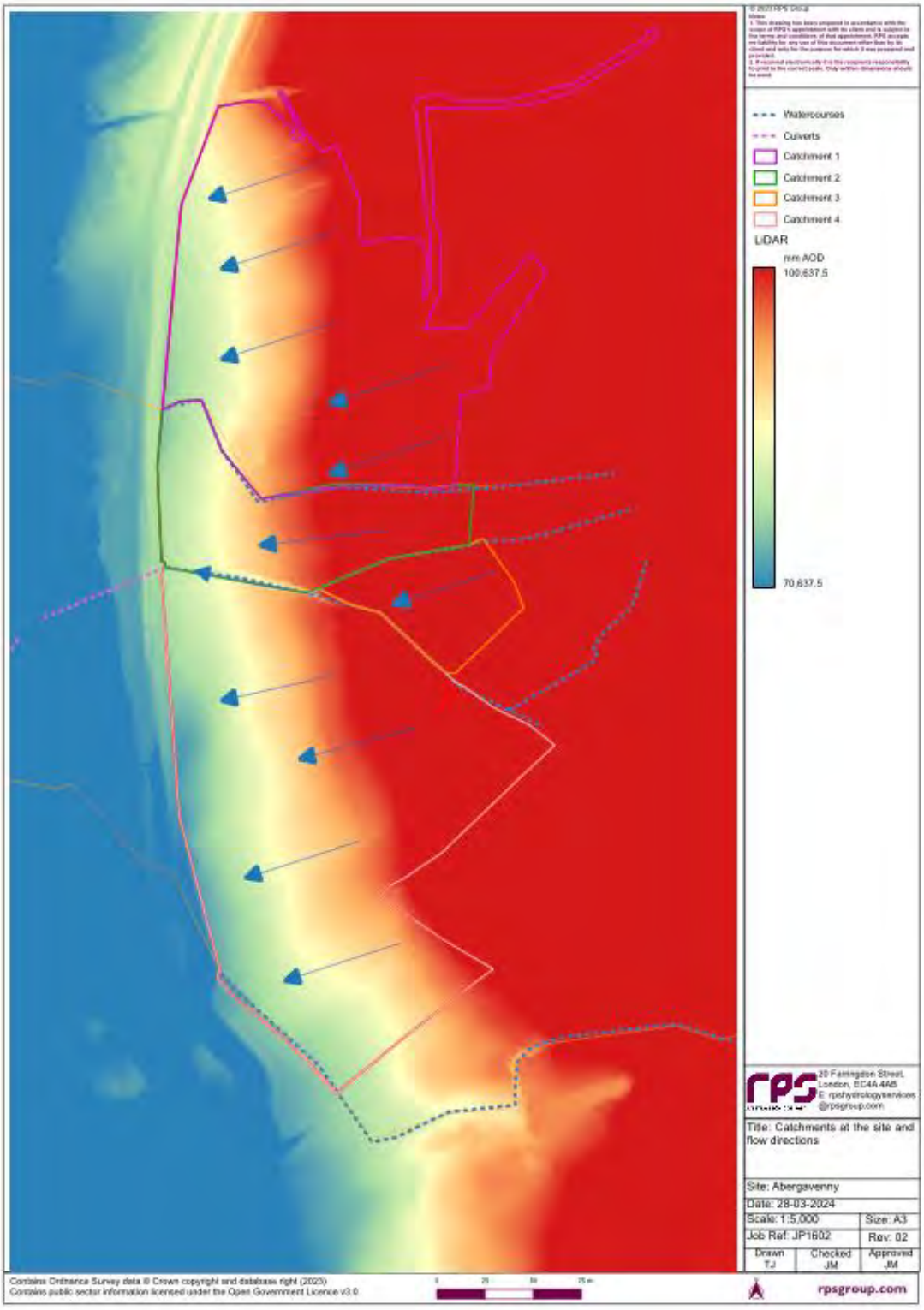


Figure 3. Catchments and Flow Directions at the site

Date: 27th March 2024
Regarding: Abergavenny

Table 1. Impermeable Areas

Ref.	Catchment	Use	Site Area (Ha)	Imp. Area %	Imp. Area (Ha)	Urban Creep (%)	Total Imp. Area (ha)
1	North	Residential	22.24	40.00	8.90	8.00	9.61
2	Middle	Residential	7.33	40.00	2.93	8.00	3.17
		Transport Hub	0.24	100.00	0.24	0.00	0.24
3	East	Residential	3.45	40.00	1.38	8.00	1.49
4	South	Residential	29.31	40.00	11.72	8.00	12.66
	TOTALS		62.57		25.17		27.17

SURFACE WATER DRAINAGE

Climate Change

Generally, residential development is considered to have a design life of 100 years. Climate change allowances in accordance with Welsh FCA guidance[1] indicates that both the central and upper estimates should be assessed to understand the range of impact. In the absence of data beyond 2115 the site will be conservatively assessed in line with the Upper Estimate for the 2080s. Therefore a 40% should be used.

Table 2. Change to extreme rainfall intensity (compared to a 1961-90 baseline)

Applies across all of Wales	Total potential change anticipated for 2020s (2015-2039)	Total potential change anticipated for 2050s (2040-2069)	Total potential change anticipated for 2080s (2070- 2115)
Upper estimate	10%	20%	40%
Central estimate	5%	10%	20%

Attenuation Required

The attenuation required for each catchment; north and south has been calculated based on 10% storage on plot, and 0.05% of storage in the pipe network. Rainfall depth is calculated based on a national assumption.

Based on this we have calculated the conservative area of land required, see Table 3.

Maps of the drainage constraints and proposed SuDS features are presented in Appendix C.

[1] https://www.gov.wales/sites/default/files/publications/2021-09/climate-change-allowances-and-flood-consequence-assessments_0.pdf

Table 3. Land required for storage

Ref.	Catchment	Volume required (m^3)	Land required for storage (m^2)
1	North	8,647	14,700
2	Middle	3,066	5,212
3	East	1,341	2,280
4	South	11,396	19,373
TOTAL		24,450	41,565

Consideration of the Drainage Hierarchy

1. Infiltration;
2. To a surface water body;
3. To a surface water sewer, highway drain or another drainage system; or
4. To a combined sewer.

The drainage hierarchy has been considered as follows.

Re-Use

Where possible water re-use should be considered at the site. Rainwater re-use can save water, not only reducing floods by reducing runoff but also by reducing soil erosion and providing water during droughts.

Greywater harvesting from showers, baths and sinks can be reused and feedback into the property for non-potable use where possible such as for flushing toilets.

Infiltration

Reference to BGS mapping indicates that the site is underlain by a bedrock of Till Devasian and Glaciofluvial Deposits. These are likely to have some permeability capacity. As such it is recommended that infiltration testing be obtained for the site at a later stage to identify the exact infiltration rates.

To a Surface Water Body

Catchment 1

A watercourse runs in a westerly direction to the south of Catchment 1. This watercourse is hydraulically connected to the River Usk and would therefore, be the favourable connection.

Catchment 2

A watercourse is present along the northern and southern boundaries of the catchment. The northern watercourse connection is at a lower elevation and therefore is favoured. This watercourse is hydraulically connected to the River Usk.

Catchment 3

A watercourse bounds the northwest and connects to the southern watercourse. This watercourse is hydraulically connected to the River Usk.

Catchment 4

A watercourse is present along the south and runs along the south west boundary. Connection to this watercourse in the centre is possible. This watercourse is hydraulically connected to the River Usk.

It is demonstrated that each of the catchments can connect to on-site watercourses.

To a Surface Water Sewer

Surface Water sewers are likely to be present along the A4645 and wider residential area. In line with the drainage hierarchy connection to a surface water sewer should only be considered if the above methods of discharge are evidenced as unviable.

Consideration of Sustainable Drainage Systems

Swales, Detention Basins and Ponds

Given the proposed development type and constraints the best appropriate approach is to construct attenuation basins and swales. Swales can be placed between development plots in an easterly to westerly direction to direct flows to the west. In the west a series of attenuation basins will be proposed which will eventually either discharge via infiltration or be connected to a watercourse.

As identified the estimated land storage for these SuDS features will be a area of 41,565m^2 (4.1ha). The estimated volume to attenuation is 24,450 m^3.

Filtration Strips

Where required filtration strips should be proposed along the entrance roads to the site, where traffic movements are higher. This will ensure that an extra level of treatment is provided for the water flowing off this proportion of the road. The access road to the northeast should comprise of loose gravel where possible. If tarmacking or similar hardstanding is used, then surface water runoff flows will need to be directed to the main site boundary,

Filter strips can also be placed surrounding the transport hub to reduce pollution.

Filter strip can be integrated into the surrounding land use adjacent to the footpaths and tracks and will be placed within grass areas. Local wild grass and flowers can be introduced to provide additional visual amenity to the area.

Rainwater Harvesting

Rainwater harvesting can provide water for non-potable uses such as irrigation or toilet flushing. It is recommended that rainwater harvesting systems such as rainwater butts and bio-retention areas such as rain gardens are provided within private garden areas of the proposed development to attenuate small quantities of roof water for re-use within garden areas.

It is noted that the attenuation benefits provided using rainwater harvesting are considered to be limited and would only be realised when the tanks were not full.

Green Roofs

Since the development is proposing residential houses with pitched roofs, it is likely that incorporating green roofs as part of the drainage strategy is not feasible.

Permeable Paving

Permeable paving can be an efficient means of managing surface water close to its source.

Given that permeable paving has a lower load bearing then traditional paving it is recommended to incorporate it into residential driveways.

Date: 27th March 2024
Regarding: Abergavenny

Permeable paving will provide a two-stage level of water treatment to help treat water and reduce pollution to an acceptable level.

We trust the above is satisfactory to meet your current design requirements specific to surface water drainage. Please note the design is Conceptual and subject to change as the design evolves.

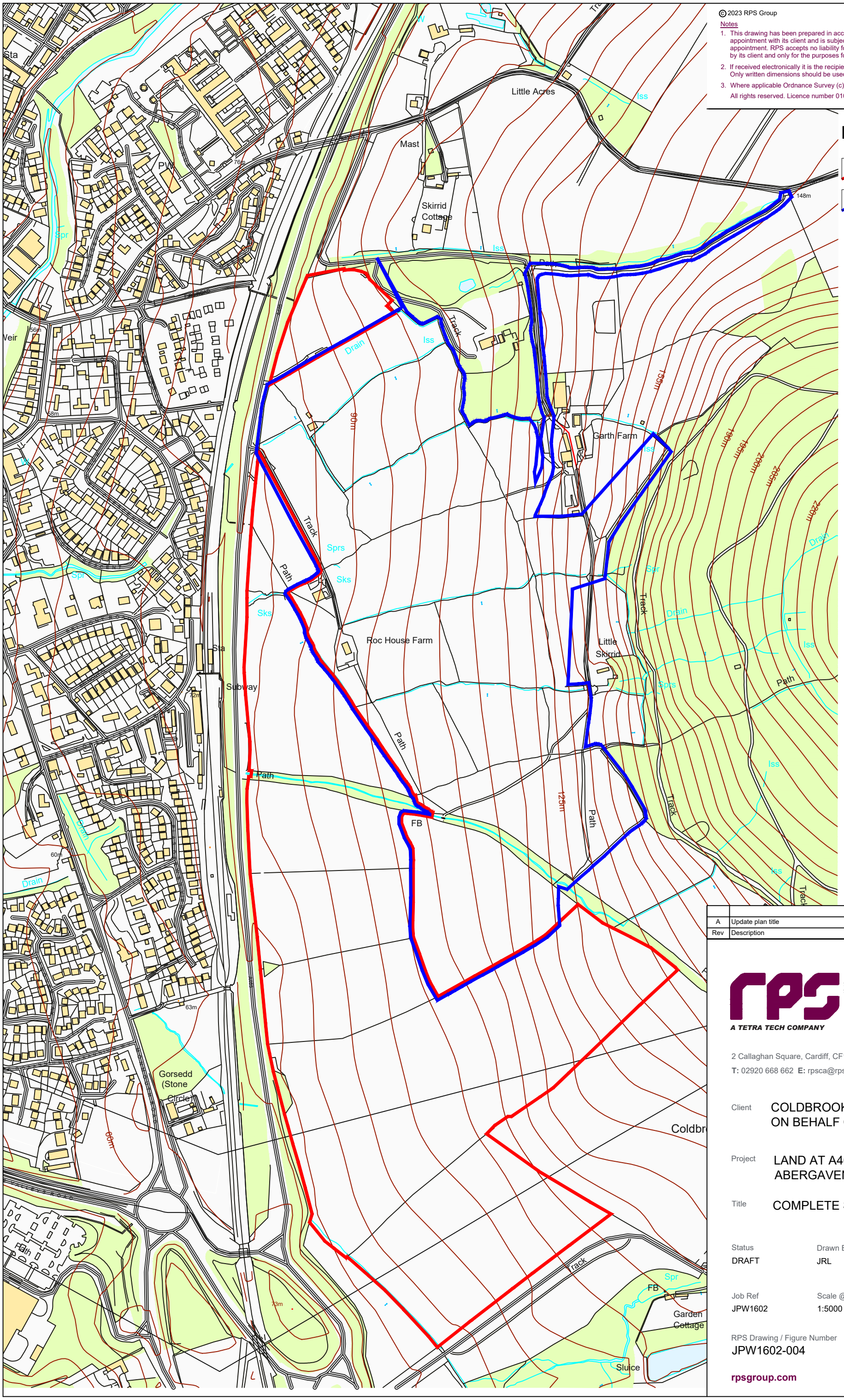
Yours sincerely,



Date: 27th March 2024
Regarding: Abergavenny

APPENDICES

A.1 Site Plan



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

- RED LINE BOUNDARY
- CS0213 BOUNDARY

Rev	Description	By	CB	Date
A	Update plan title	PO	DP	20/01/23

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: COMPLETE SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	JRL	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	JAN-2023

RPS Drawing / Figure Number: JPW1602-004

Rev: A

rpsgroup.com

W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

A.2 LiDAR Map

© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purpose for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Site Location

LiDAR

mm AOD

100,637.5

70,637.5

Contains Ordnance Survey data © Crown copyright and database right (2023)
Contains public sector information licensed under the Open Government Licence v3.0

0 25 50 75 m

N

20 Farringdon Street,
London, EC4A 4AB
E: rpshydrologyservices@rpsgroup.com

Title: Elevation at the site

Site: Abergavenny

Date: 27-03-2024

Scale: 1:5,000	Size: A3
Job Ref: JP1602	Rev: 02

Drawn	Checked	Approved
TJ	JM	JM

rpsgroup.com

A.3 Watercourses on Site

© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purpose for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Site Location

Watercourses

Culverts

20 Farringdon Street,
London, EC4A 4AB
E: rpshydrologyservices
@rpsgroup.com

Title: Watercourses at the site

Site: Abergavenny

Date: 27-03-2024

Scale: 1:5,000 | Size: A3

Job Ref: JP1602 | Rev: 02

Drawn	Checked	Approved
TJ	JM	JM

Contains Ordnance Survey data © Crown copyright and database right (2023)
Contains public sector information licensed under the Open Government Licence v3.0

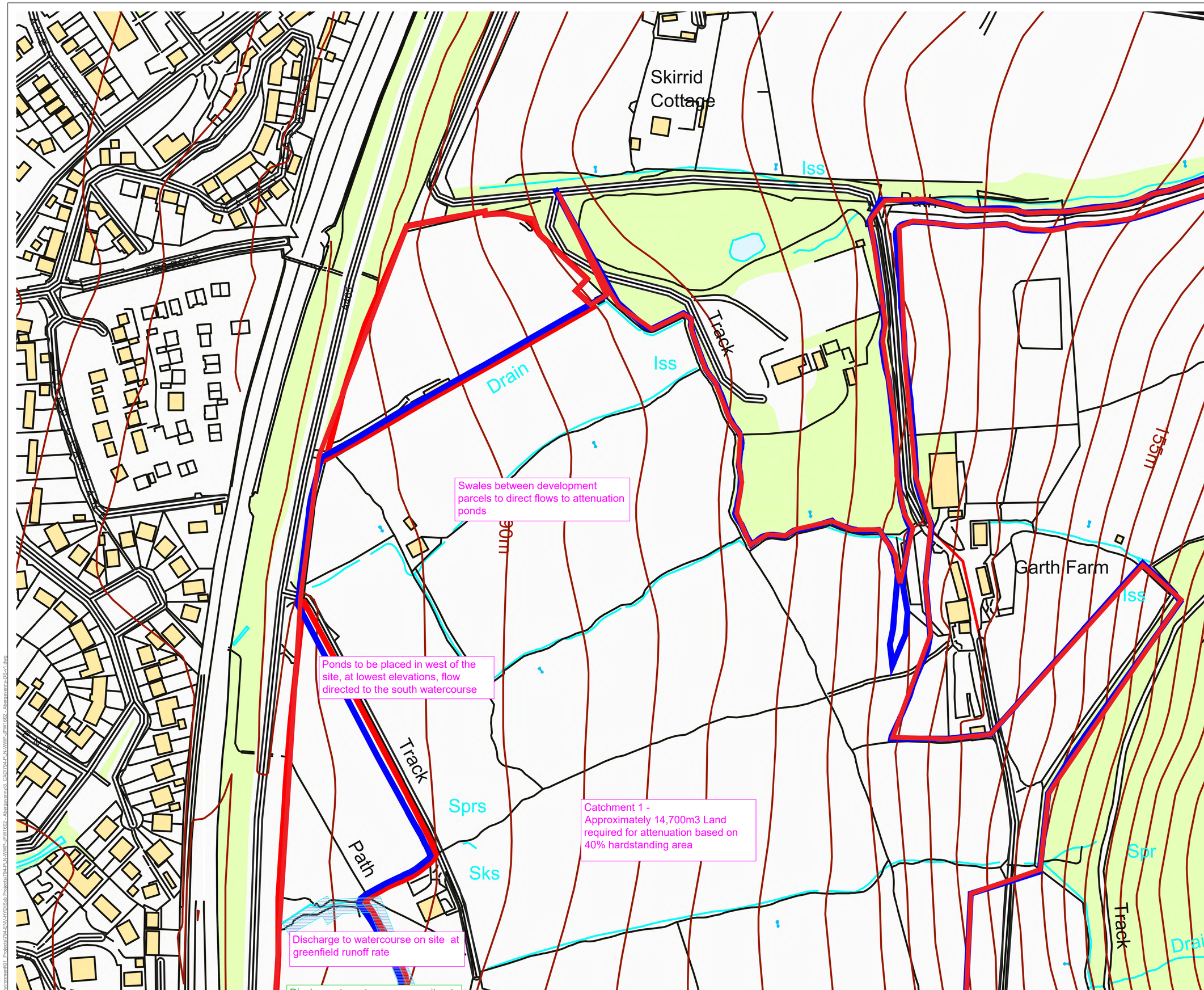
0 25 50 75 m

N

rpsgroup.com

Date: 27th March 2024
Regarding: Abergavenny

A.4 Drainage Constraints



O:\Environment\01 Projects\794-ENV-HYDIS\4 Projects\794-PLN-NWP_JPW1602 - Abergavenny\8 CAD\794-PLN-NWP_JPW1602 - Abergavenny-DS-v1.dwg

Sprs

Path

Sks

Catchment 1 -
Approximately 14,700m3 Land required for attenuation based on 40% hardstanding area

Discharge to watercourse on site at greenfield runoff rate

Discharge to watercourse on site at greenfield runoff rate

Roc House Farm

5m development buffer from watercourse

Swales between development parcels to direct flows to attenuation ponds

Catchment 2 -
5,212m3 Land required for attenuation based on 40% hardstanding area

5m development buffer from ordinary watercourse/ drain

Path

A pond to be placed in west of the site, at lowest elevations, flow directed to the south watercourse

Catchment 3
2,280m3 Lan
for attenuatio
40% hardsta
within the ca

FB

O:\Environment\01 - Projects\3794-ENV-HYD\Sub Projects\3794-PLN-WWP-JPW1602 - Abergavenny\8. CAD\3794-PLN-WWP-JPW1602 - Abergavenny.DS-v1.dwg

Skirrid

5m development buffer from watercourse

Sprs

Catchment 2 - 5,212m3 Land required for attenuation based on 40% hardstanding area

5m development buffer from ordinary watercourse/ drain

A pond to be placed in west of the site, at lowest elevations, flow directed to the south watercourse

Catchment 3- 2,280m3 Land required for attenuation based on 40% hardstanding area within the catchment

Track

FB

Swales between development parcels to direct flows to attenuation ponds

8m development buffer from main watercourse

'3m3 Land

O:\Environment\01 - Projects\794-ENV-HYD\Sub Projects\794-PLN-WWP_JPW1602 - Abergavenny\8. CAD\794-PLN-WWP-JPW1602 - Abergavenny-DS-v1.dwg

within the catchment

FB

Swales between development parcels to direct flows to attenuation ponds

8m development buffer from main watercourse

Catchment 4-
Approximately 19,373m2 Land required for attenuation based on 40% hardstanding area

Ponds to be placed in west of the site, at lowest elevations, flow directed to the central watercourse

Swales to be placed between development plots to direct flows to attenuation ponds

A499

63m

Gorsedd (Stone Circle)

BONMOUTH ROAD

Discharge to watercourse on site at greenfield runoff rate

8m development buffer from main watercourse

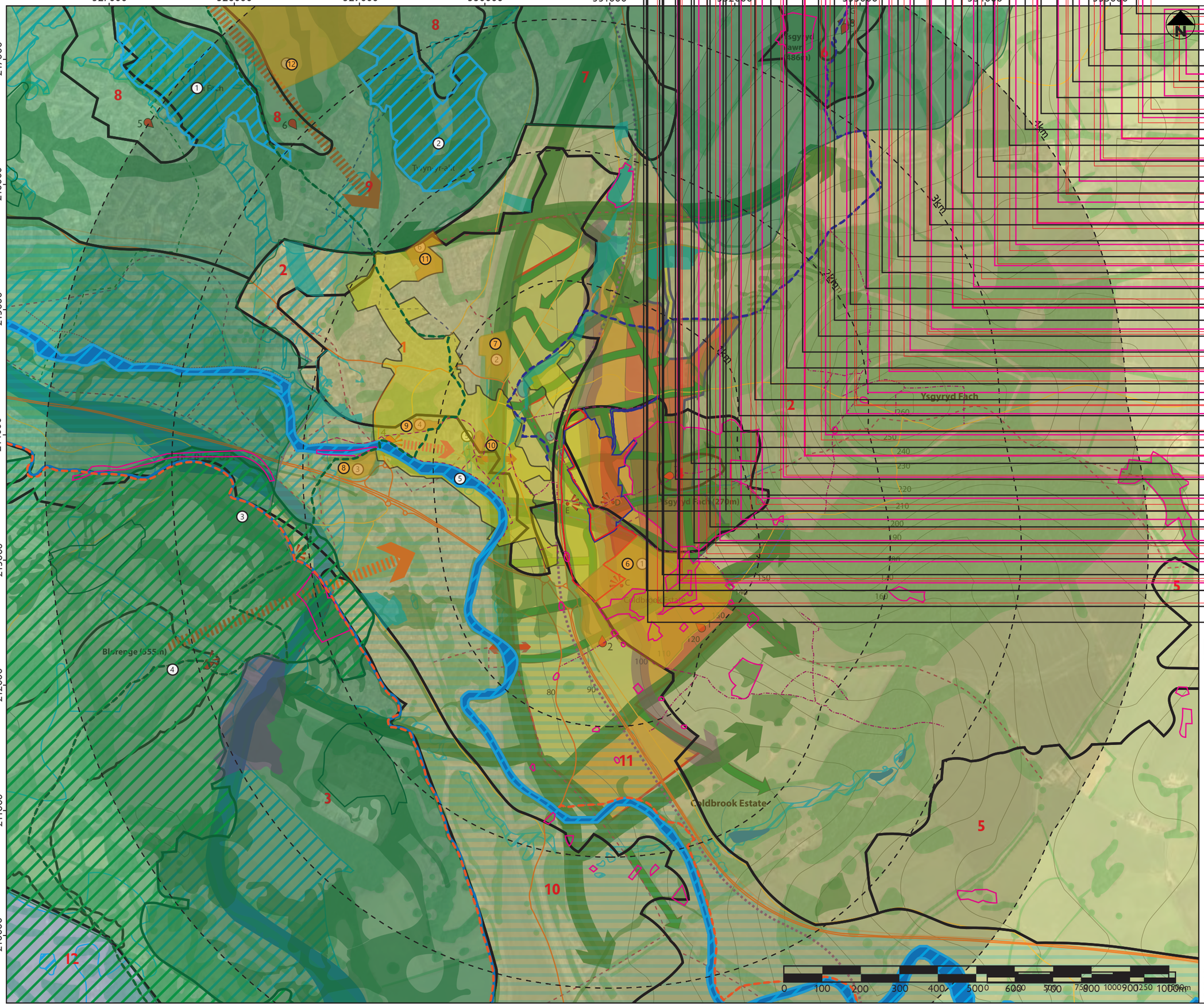
Col

rack

O:\Environment\01 Projects\794-ENV-HYD\Sub Projects\794-PLN-WWP-JPW1602 - Abergavenny\8 CAD\794-PLN-WWP-JPW1602 - Abergavenny-DS-v1.dwg

Appendix 5

Green Infrastructure Strategy and Statement



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- ~~Incremental 1km buffer from site boundary~~
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

~~Statuory Designations~~

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- ~~National parks - Bannau Brycheiniog and Black~~ Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

~~Statuory Biodiversity Designations~~

1. ~~Sugar Loaf Woodlands (Deri-fach Woodland)~~ ~~SAC&SSSI~~
2. ~~Sugar Loaf Woodlands (Deri-fach Woodland)~~ ~~SAC&SSSI~~
3. ~~Coed-y-person SSSI~~
4. ~~Blorenge/Blorenge SSSI~~
5. ~~River Usk/Afon Wysg SSSI/SAC~~

~~Historic parks & gardens~~

6. ~~Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).~~
7. ~~Bailey Park~~
8. ~~New Cemetary~~
9. ~~Linda Vista Gardens~~
10. ~~Abergavenny Castle~~
11. ~~The Hill~~
12. ~~Abergavenny Priory Deer Park~~

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

Abergavenny East, Candidate Site

Green Infrastructure Statement

2nd May 2024

Overview

As part of the development process, the existing Green Infrastructure (GI) asset has been assessed through landscape desktop survey, and the context of the site, in its wider GI network, and within the policy framework in Wales and Torfaen. Consideration of habitats and ecological features within the red-line boundary (Coldbrook Estate land) has been informed by a Preliminary Ecological Appraisal (PEA)[1], with a desktop ecology survey conducted for the remaining parts of the Candidate site outside the red line. The following statement reports on the iterative GI process and how, based on national and local policy, positive contributions can be achieved by the proposed candidate site, if developed.

Introduction

The term *'Green Infrastructure'* first came to prominence in the early 2000's most notably in the Landscape Institute Position Statement *'Green Infrastructure An integrated approach to landuse' (2009).* This document defined Green Infrastructure as;

> *'The network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. It is a natural, service-providing infrastructure that is often more cost effective, more resilient and more capable of meeting social, environmental and economic objectives than 'grey' infrastructure.'*
>
> GI Functions are described as the:
> *'roles that assets can play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystems services. They may have obvious primary functions, but each asset can perform different functions simultaneously – 'multifunctionality.'*

The natural environment between and within towns and cities, including greenspace, vegetation and water. Provision of GI offers a multitude of ecosystem services (i.e. the benefits that people derive from nature) and forms part of a sustainable approach to the management of natural resources. New infrastructure should seek to strengthen and reinforce existing assets within a site and it should be planned and designed to be beneficially multi-functional.

[1] Soltys Brewster Ecology. 2023. *Land East Of Abergavenny. Preliminary Ecological Appraisal.* Document Ref: E2315301/Doc 01, Dated 30 March 2023.

Principal Targets of GI.

The principal multifunctional targeted benefits of GI are to:

1. Protect and enhance biodiversity and the resilience of ecosystems and their connectivity;
2. Consider Opportunities for habitat protection, restoration, creation and management in the provision of GI;
3. Contribute to improved mental health with more direct contact with nature, the seasons and natural processes;
4. Identify opportunities where existing and potential green infrastructure could be improved and enhanced as part of placemaking;
5. Provide opportunities for improved physical health and wellbeing through recreational access, community permeability and connectivity;
6. Enhance place-making identity and sense of community ownership;
7. Improve townscape and landscape quality and visual amenity;
8. Integrate play and recreation in GI networks;
9. Improve micro-climate (summer cooling/winter shelter);
10. Mitigate and adapt to the impacts of climate changes improving of;
    - Oxygen production.
    - Carbon sequestration (locking carbon in vegetation and soils).
    - Water sequestration (vegetation evapotranspiration and formal attenuations).
    - Improve air and water quality.
    - Reduce flood risk.
    - Provide alternative transportation opportunities (cycling/walking/public transport links).

Green/Blue Infrastructure (GI) is the term adopted in this document to incorporate the now more fully developed drainage requirements for developments under SABs, (Sustainable Drainage Approval Body) in Wales, along with other GI elements including all the features of

Policy & Guidance

Planning Policy Wales 2024 (12th Edition)

<u>6.2 Green Infrastructure</u>

"Green infrastructure plays a fundamental role in shaping places and our sense of well-being, and are intrinsic to the quality of the spaces we live, work and play in. The planning system should protect and enhance green infrastructure assets and networks because of these multi-functional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision alongside the need to meet society's wider social and economic objectives and the needs of local communities. The multiple benefits that resilient ecosystems and green infrastructure offer to society, including the economic and social contribution they make to local areas, should be taken into account when balancing and improving these needs."

"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, helping to overcome the potential for conflicting objectives, and contributing towards health and well-being outcomes."

Future Wales: The National Plan 2040

Policy 9 – Resilient Ecological Networks and Green Infrastructure

"To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."

> "As part of a green infrastructure assessment, broad opportunities for habitat protection, restoration or creation and the provision of green infrastructure may be specified as part of identifying areas to be safeguarded or may take the form of more specific allocations. This may be achieved, for example, through the provision of buffer areas around protected sites or stepping stones connecting habitats or through the identification of green infrastructure in and around urban areas."

Local GI Policy & Guidance: Monmouthshire CC

Green Infrastructure SPG April 2015

- Provides a Evidence Base
- Identifies The Councils GI Approach
- Provides as structure for Embedding GI into Development
- Identifies Potential GI Requirements for Key Growth Areas

For the Abergavenny area the SPG identifies the following.

'Abergavenny is a distinctive historic market town nestled within the Usk Valley, immediately outside the Brecon Beacons National Park's eastern boundary. Its town centre is a conservation area containing many listed buildings, including the ruins of the Norman Abergavenny Castle. Together with the nearby village of Llanfoist, it is overlooked and sheltered by the Blorenge and the Sugar Loaf mountains, located to the south-west and north-west respectively. The Blaenavon World Heritage Site stretches to the south-west. Other key GI assets include:

- *The River Usk (also a SAC) and its floodplain (to the south of Abergavenny), which includes accessible natural greenspaces such as Castle Meadows.*
- *The River Gavenny which flows through Abergavenny and the Monmouthshire and Brecon Canal situated to the south of Llanfoist.*
- *Historic parks/gardens including Bailey Park within Abergavenny, Abergavenny Priory Deer Park to the north and Coldbrook House to the south-east.*
- *Public Rights of Way and the Usk Valley Walk long distance path.*
- *Partly accessible woodlands such as Twyn-yr-allt and Deri-fach (also designated as SSSI and SAC) to the north and Coed-y-person to the south (designated as a SSSI)'*

Appendix C of the document provides a Green Space assessment of Abergavenny, with a high level Landscape Sensitivity and Capacity Study, including high level Landscape Capacity for Housing. These identify a primary Green Infrastructure corridor along the southern site boundary vegetation, along the railway line and A465 road. This strategic assessment information has informed our desktop baseline and has been incorporated into our more detailed site assessment.

In addition, a review of the Ecological Connectivity Assessment (2010) produced as part of the current (adopted) LDP has been undertaken. The relevant map from the 2010 identifies the vegetation corridor along the A465 to the west of the Candidate Site and some of the adjacent hedgerow corridors as providing existing ecological connectivity.

Candidate Site GI Process

As part of the candidate site process, the existing Landscape, Visual and Green Infrastructure (GI) asset has been assessed through Landscape desktop survey and Ecological desktop and site survey (red-line Coldbrook Estate Land only), and the context of the site, in its wider GI network, considered. These assessments are illustrated and reported in the following document(s);

- 2488601-SBC-XX-ZZ-DR-L-001, Landscape Character Areas
- 2488601-SBC-XX-ZZ-DR-L-002, Visual Constraints & Opportunities
- 2488601-SBC-XX-ZZ-DR-L-003 -005, Viewpoint Photography
- 2488601-SBC-XX-ZZ-DR-L-006, Green Infrastructure Strategy
- 2488601-SBC R01 Landscape and Visual Appraisal Statement
- Preliminary Ecological Appraisal (PEA), Dated 30 March 2023

Summary of Ecological Features and Habitats (Red Line area)

As illustrated on the Phase I Habitat map, the majority of the land within the red-line boundary comprises of improved agricultural grassland or arable fields which would be considered of low ecological value. The field parcels are separated by a network of native hedgerows and small areas of woodland, with ditches or streams associated with several of these habitat corridors. A summary of the habitat types and their extent within the red line is shown in Table 1.

Table 1 Extent of Habitats within & immediately adjacent to Red Line

Habitat Type	Habitat Area (ha.) or Length (Linear M)
Improved Grassland or Arable Land (F1-F8)	27.95ha.
Woodland (within or immediately adjacent)	3.53ha
Watercourses (Streams (S) & Ditches (D)). Typically along hedgerow corridors	Streams – 937m Ditches – 805.25m
Intact Species-rich hedgerows	206.3m
Intact species-poor hedgerows	1252.1m
Defunct species-poor hedgerows	234.7m
Species-rich hedgerow with trees	900.5m
Species-poor hedgerow with trees	472.5m

The dominance of habitats of low ecological value lends itself to the Stepwise Approach set out in PPW with development focused on these areas allowing retention and enhancement or more valued ecological features and habitats. On a site wide basis, providing development at this location would also contribute to 'avoiding' development pressure on other sites to meet LDP housing needs.

The Green Infrastructure Strategy, illustrates the culmination of this strategic assessment process and the existing GI Context, and potential development site multifunctional GI connections, to enhance and contribute to the wider GI network. As part of the candidate site assessment process the context and enhancement of the existing GI has been an integral consideration.

GI Context & Connectivity

The stepwise approach (PPW 12) has been implemented. A summary of the stepwise approach is as followed-

1. **Avoid**

   To avoid damage to biodiversity and ecosystem functioning.

2. **Minimise**

   Alternative sites that would result in less harm, no harm or gain are to be fully considered to minimise the any harmful environment effects.

3. **Mitigate/Restore**

   '...ensure that features and elements of biodiversity or green infrastructure value are retained on site, and enhanced or created where ever possible.'

4. **Compensate on site**

   Onsite compensation must be sought when all other options have been exhausted.

5. **Compensate off site**

   Offsite compensation must be sought when all other options have been exhausted.

6. **Long Term Management**

   Long Term Management of retained and new GI assets to secure enhancement.

Summary of Effects, Mitigation & Enhancement

The stepwise approach has been applied to the proposed scheme, within the LDP stage framework masterplanning GI led process.

Step 1&2: **Avoid/Minimises**

As indicated above, the majority of the habitats within the red line boundary would be considered of low ecological value – locating development in these areas would avoid/minimise impacts on the primary GI network as part of the candidate site development approach.

Step 3&4: **Mitigate/Restore & Compensate (onsite)**

The site has the potential to Mitigate, Restore and Compensate for the necessary loss of GI components within the site including the enhancement of existing north-south and east-west GI corridors. Supplementary planting to mitigate for any loss of the existing quantum of hedgerow or woodland habitats (as summarised in Table 1) would aim to provide increased coverage of these species as part of the GI network to achieve a demonstratable gain for biodiversity.

Step 5: **Compensate (offsite)**

Off-site compensation is not anticipated to be necessary, subject to detailed masterplan development.

Step 6: **Long Term Management**

An additional benefit which can result from development could be the opportunity for the long-term management of the retained and new GI assets to secure these enhancements and their value in the long term.

GI Conclusion

Key outcomes of the GI assessment identify that the site has the potential to accommodate development, particularly on the lower more visually contained slopes, which also correspond to habitats of low ecological value with remaining more sensitive land parcels having the capacity to accommodate GI mitigation and enhancements. An indicative visual buffer line illustrates the broad boundary between the most appropriate land for development and the less appropriate land for development, subject to detailed development masterplanning with consideration to the density, grain, and type of develop and incorporated GI corridors and buffering.

Appendix 6

Landscape and Visual Appraisal

(incl. Visual Opportunities and Constraints Plan, Annotated Viewpoints and Landscape Character Areas Plan)

ABERGAVENNY EAST CANDIDATE SITE

LANDSCAPE & VISUAL APPRAISAL STATEMENT (LVS)

April 2024

Intentionally blank

RPS

ABERGAVENNY EAST CANDIDATE SITE

LANDSCAPE & VISUAL APPRAISAL STATEMENT (LVS)

Document Ref: 2488601-SBC- R01

Issue	Revision	Stage	Date	Approved by
01	R01	-	11/04/24	Greg Vaughan

Abergavenny East Candidate Site– Landscape and Visual Appraisal Statement (LVS)

1.0 Introduction and Approach.

1.1 Soltys Brewster Consulting were commissioned in March 2024 by RPS to produce a 'high level' landscape and visual appraisal relating to land to the east of the A465 at Abergavenny. The land is a Candidate Site for a residential development within the Monmouthshire Replacement LDP.

1.2 The following tasks were undertaken by a Chartered Landscape Architect (CMLI) in April 2024. A study area extending to 4km from the centre of the site was adopted.

a) A desk-based appraisal of the baseline landscape context, including the physical landscape, designations and landscape character (LANDMAP).

b) A site-based assessment to establish contextual views and site visibility.

c) Report compilation, providing a summary of the baseline landscape and visual context and resulting constraints and opportunities to be considered in masterplanning proposed development within the site.

1.3 *Green Infrastructure Supplementary Planning Guidance (Monmouthshire CC Adopted April 2015)* includes key findings from the *Landscape Sensitivity and Capacity Study (Main Settlement Summaries, 2010).* This identifies the site at a strategic level as having a high and high/medium sensitivity and a low capacity for housing development. This appraisal considers the capacity of the site for housing development at a more detailed level, in relation to the site topography, views and opportunity for buffering to maximise development capacity in an acceptable way.

2.0 Overview of Proposed Development.

2.1 Outline proposals for the site have been produced, illustrated on *'Land East of A465, Abergavenny – Concept Plan, (Pegasus Group P22-3191_DE_001_A_02).* The masterplan indicates:

- Residential development served by primary vehicular access from the A465T Road.
- A transport hub within the northern section of the site, adjacent to the A465T road.
- Public open space primarily to the south and east of the site. Indicative location of SuDs and play areas are included across the site along with proposed planting to supplement retained existing.

3.0 Landscape and Visual Context.

The Site

3.1 The site is located on agricultural land to the immediate south-east of Abergavenny, separated by transport corridors comprising the A465 road and the Newport to Hereford rail line. The land rises sharply from a low point to the south of the site at 75m AOD eastwards to a high point beyond the site boundary at Ysgyryd Fach at 270m AOD. The site contains a network of managed uniform hedges and taller field boundaries containing trees and unmanaged hedges. There are also a number of streams flowing east to west across the site, most notably including a well-vegetated corridor located centrally and accessed by an adjoining public footpath. The site is well-contained by woodland on the higher land at Ysgyryd Fach and also on lower-lying areas forming the site boundary. This includes roadside woodland and trees along the A465 to the east and woodland blocks within the Coldbrook Park Estate to the south and around Caederwen to the north.

The Study Area (4 km)

3.2 The site is contained between the settlement of Abergavenny and the local wooded landform of Ysgyryd Fach. To the west, flowing from north-west to south-east is the River Usk and beyond this rises the Blorenge. To the north of Abergavenny, the land rises to the Sugar Loaf. These uplands form distinctive and popular highpoints within the Banau Brycheiniog National Park. Further to the north-east, Ysgyryd Fawr/The Skirrid, another popular high point, forms the eastern edge to the BBNP. Beyond Ysgyryd Fach, to the east, the study area comprises a sparsely populated agricultural landscape of rolling irregular fields enclosed by managed hedges trees and woodland.

Landscape Designations and Background Planning Policy

3.3 A summary schedule of landscape designations that extend into the study area is provided in ***Appendix 1.***

3.4 The Grade II Registered Historic Park and Garden of Coldbrook Estate extends within the site boundary to the south. This statutory designation comprises a multi-layered small park and gardens dating from the medieval period to the early twentieth century, with areas of rolling pasture interspersed with mature woodland copses and individual trees. The main drive, lying just beyond the southern alignment of the site boundary is flanked by mature lime trees. Significant views from the house are acknowledged to the north to the wooded slopes of Ysgyryd Fach and to the south-east, across rolling farmland.

3.5 Within the wider study area, to the north and to the west at distances beyond 1.6 km, the Bannau Brycheiniog National Park (BBNP) extends broadly across upland areas, including the Blorenge, the Sugar Loaf and to the north-east, the Skirrid, (Ysgyryd Fawr). Panoramic views from these summits will extend across areas that may, in some cases, be outside the BBNP. There will be a statutory duty to ensure that development considers indirect effects on these views and the wider setting of the BBNP.

3.6 To the west of the study area, extending across the Blorenge, the Blaenavon UNESCO World Heritage Site together with the Blaenavon Registered Landscapes of Outstanding Historic Interest reflect the multi-layered industrial heritage of the area.

3.7 A Conservation Area extends across the historic town centre of Abergavenny to the west. This reflects the historic core town centre and its medieval core, focussed on the Castle and St Mary's Church and the distinctive medieval layout of roads and burgage plots.

3.8 The study area also contains promoted long-distance footpaths including the Cambrian Way, Beacons Way and the Usk Valley Walk. These provide popular tourist routes through the study area. Public footpaths also extend through the site, providing a popular route to the summit of Ysgyryd Fach.

Landscape Character/LANDMAP

3.9 ***Figure 1*** illustrates Landscape Character Areas (LCA's) that extend within the study area. ***Appendix 2*** provides a summary of the key characteristics and relative values of each LCA.

3.10 The site falls partially within ***LCA 4 Ysgyryd Fach,*** evaluated as high in value. This small LCA is strongly characterised by the wooded landform of Ysgyryd Fach. It forms a distinctive and attractive dome rising from the lower ground and is a visual focus and a backcloth to Abergavenny, Coldbrook Estate and the surrounding lower lying land of the Usk Valley. Below the wooded dome, the landscape is open pasture fields with managed hedges and occasional farmsteads.

3.11 Remaining areas of the site to the west and to the south fall within **LCA 2 Northern Hills.** This LCA extends across a broad tract of Monmouthshire to the east of the study area. It is evaluated as high value overall. It is a tranquil and gently rolling agricultural landscape of irregular fields enclosed by a rich tapestry of hedges, trees and woodlands.

3.12 Abutting the western edge of the site is the historic market town of Abergavenny, defined within LCA 1 Abergavenny. This urban area, evaluated as moderate value, has a distinctive historic core and a strong and positive relationship to the River Usk, (***LCA 11 Upper Usk Valley***). The Usk Valley extends along the southern edge of Abergavenny and comprises an attractive and open valley floor with a distinct sense of place and a high value. Surrounding hills, most notably including the Blorenge (***LCA 3 Blorenge***) and the Sugar Loaf (***LCA 8 Sugar Loaf***) and, more distantly to the north-east, the Skirrid (***LCA 6 Ysgyryd Fawr***) provide an important scenic backcloth to the Usk Valley and Abergavenny. These upland areas are popular tourist destinations and scenic landmarks that are outstanding in value with key sensitive characteristics relating to panoramic views, isolation, remoteness and historic/cultural identity.

Visual Appraisal/Viewpoints

3.13 A site visit was carried out in April 2024 and photographs recording views of the site from seven viewpoints within the study area are illustrated on Figures 3 to 5. A visual analysis is also presented on Figure 2 to assist with identifying site constraints and opportunities in relation to views and visibility.

3.14 The visual analysis identifies that:

- The site possesses a strong west facing aspect with a visual envelope likely to extend broadly across the Usk Valley as far as the enclosing hills of the BBNP. It will include parts of the Blorenge and, more distantly north-west and beyond the study area, the Sugar Loaf. **Viewpoint D Ysgyryd Fach** illustrates typical views west and north-west from higher parts of the site. **Viewpoint B Blorenge** is located on the upper edge of the Blorenge scarp and illustrates the extent of the strong intervisibility that the site shares with this summit. The entire site will be visible in views east in the middle distance beyond Abergavenny and the wooded A465 corridor.
- The site is visually enclosed by the wooded landform of Ysgyryd Fach and there will be no visibility of the site from the north and around to the east. Within panoramic views south from the Skirrid (Ysgyryd Fawr) for example, (**Viewpoint G The Skirrid**), the site, including the extent of the blue line access track to the north, is obscured behind woodland and landform.
- The site is visible within filtered and glimpsed views from the lower-lying undeveloped areas of the River Usk Valley and the east-facing valley sides. **Viewpoint F Cambrian Way/Castle Meadows, Abergavenny** illustrates typical views from the riverside. Beyond the scattered intervening mature trees and woodland, the distinctive wooded landform of Ysgyryd Fach forms an important green backcloth to the views east. Within the site, lower areas, (i.e. below around 100m AOD), however, are largely obscured by intervening trees. ***Viewpoint A Cambrian Way/Monmouthshire and Brecon Canal*** illustrates the view east from more elevated sections of the lower valley sides more to the west. Visibility of the lower sections of the site increases slightly although intervening vegetation, particularly along the A465 continues to filter and obscure these areas. Broadly above the 100m AOD level, the fields within the site are visible and contribute strongly to the attractive backdrop that Ysgyryd Fach provides within views east from the undeveloped sections of the Usk Valley floor.
- From developed areas within Abergavenny, there will be some localised glimpse views where built form allows. Within these views, the wooded summit and the upper fields within the site may be visible to varying degrees. Lower sections of the site will be obscured, particularly by the mature vegetation along the A465 corridor and elsewhere.
- Local views to the site will be constrained by vegetation. Along the A465, the boundary trees, hedges and woodland screens visibility across the site. To the north, there will be no visibility to the site from routes that will include minor roads and the Beacons Way, due to

a combination of topography and vegetation. From the south, views from the Coldbrook Estate, (RHPG), have been considered. **Viewpoint C Coldbrook Estate** illustrates views north from drive and approach to Coldbrook House. The southern extent of the site within the lower, nearest field within the site is clearly visible in the foreground of the view. Elsewhere local enclosure is provided by elevated land and trees in the foreground.

4.0 Master planning constraints and opportunities.

4.1 Section 3.0 provides a review of the landscape and visual context for the site within a 4.0km study area.

4.2 The key constraints that will require consideration in master planning of the site are summarised below:

Landscape Designations

- ***BBNP.*** Key characteristics that contribute to the special qualities of the BBNP will include long views from the summits of the Blorenge and Sugar Loaf. These views will be influenced by land-use changes that fall outside the National Park but contribute to the setting. The site shares close intervisibility with the Blorenge and to a lesser degree due to distance, the Sugar Loaf.

- ***Coldbrook Estate Historic Park and Garden.*** The boundary of this statutory designation extends partially within the site. It is likely that areas within the designation will be unacceptable for development. Areas beyond the designation that contribute to the setting of the estate will also need to be sensitively integrated, perhaps through incorporation of an appropriate buffer.
- ***Access and recreation.*** A number of public footpaths extend though the site including a popular route providing access to the summit of Ygyryd Fach. These will need to be integrated with the proposed development.

Landscape Character/LANDMAP

- ***Abergavenny (MNMTHVS072).*** The town possesses a positive relationship with the River Usk valley floor. Master planning within the site will need to ensure that expansion of the urban development to higher enclosing slopes of Ysgyryd Fach does not dilute this relationship.
- ***Blorenge BBNP LCA 15 Blorenge LANDMAP MRTHRVS840.*** A key characteristic is the strong sense of place reinforced by panoramic views. The site is visually prominent in views

east across the Usk Valley from the upper scarp slope and master planning will need to ensure proposed development is sensitively integrated with the grain of the site-based landscape/GI.

- ***Ysgyryd Fach (MNMTHVS013).*** This LCA/LANDMAP visual and sensory aspect area extends across a section of the site (blue line boundary) to the north. Key characteristics relating to its distinctive landform and undeveloped appearance that provide a backcloth to Abergavenny and to Coldbrook House and surrounding lower-lying land will need to be retained.

Visual/Views

- Ysgyryd Fach forms a important green backcloth to the undeveloped areas of the Usk Valley. Broadly above the 100m AOD level, the fields within the site are strong visual contributors to this backcloth and it is likely that development within these sections will be either unacceptable or visually constrained.
- As outlined above, views north from the drive and approach to Coldbrook Estate will need to be considered and development sensitively integrated through an appropriate visual buffer.

4.3 The key opportunities that the site offers in relation to master planning are summarised below:

- **Existing site Green Infrastructure (GI).** The site contains a rich tapestry of existing GI corridors, including wooded stream corridors, managed and unmanaged hedges and woodland. This provides a strong structure that could be reinforced to integrate proposed development with the landscape.
- **Visual buffers.** An opportunity exists to maximise the development potential of the site through provision of a strategic visual planted buffer broadly extending north to south through the site, following the 100m contour. Some development may be justified above the 100m contour with the added benefit of the planted buffer to assist with screening and integration. An additional visual buffer would also be justified to the south of the site to ensure sensitive integration with the setting of the Coldbrook Estate. Strengthening and reinforcing the existing hedgerows in this location with buffer planting would achieve this.
- **Visual connectivity to Abergavenny.** The lower sections of the site, (i.e. below 100 m AOD) are visually enclosed and will strategically appear well-connected to Abergavenny without diluting the positive relationship that the town possesses to the River Usk.

5.0 Conclusion

5.1 The LVS has considered the landscape and visual context for the site within a 4.0km study area. This identifies that areas of the lower site have potential and capacity to accommodate development within an appropriately designed GI structure, with sensitivity to the existing GI network. Lower slopes are relatively visually enclosed. An indicative visual buffer line illustrates the broad boundary between the most appropriate land for development and the less appropriate land for development, subject to detailed development masterplalnning, with consideration to the density, grain, and type of develop and incorporated GI buffering.

APPENDIX 1: LANDSCAPE DESIGNATIONS

Statutory Designations

Bannau Brycheiniog National Park (BBNP)	This designation extends across areas to the north and to the west of the study area within 1.6 km the site boundary at its closest. Special Qualities of the BBNP are: • *Sweeping grandeur & outstanding natural beauty.* • *Peace, tranquillity & darkness.* • *Contrasting patterns, colours and textures.* • *A sense of place & cultural identity.* • *Sounds, sights, smells & tastes.* • *Sense of discovery.* • *Mosaic of diversity.* • *Living landscape.* • *Enjoyable & accessible.* • *An intimate sense of community.*
Blaenavon World Heritage Site	Granted in 2000 by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as World Heritage Site (WHS), this designation is located approximately 1.6 km to the west of the proposed development site boundary. The designation is principally defined by the boundaries of land historically leased or purchased to provide the minerals, energy and infrastructure for the ironworks, and by additional land used in direct association with the ironworks or its communities.
Registered Historic Parks and Gardens	Coldbrook Historic Gardens and Parkland extends partially within the site boundary to south. This comprises a multi-layered small park and gardens dating from the medieval period to the early twentieth century, with areas of rolling pasture interspersed with mature woodland copses and individual trees. The main drive, lying just beyond the southern alignment of the site boundary is flanked by mature lime trees. The original manor House has been removed and replaced with a more house, set further to the north west although remaining features are largely retained. Within Abergavenny there are further RHPGs, at: • *Bailey Park* • *New Cemetary* • *Linda Vista Gardens* • *Abergavenny Castle* • *The Hill* • *Abergavenny Priory Deer Park*

Non Statutory Designations

Blaenavon Registered Landscapes of Outstanding Historic Interest	The Register of Landscape of Outstanding Historic Interest in Wales (Part 2.1) has been established, by Cadw/ International Council on Monuments & Sites (ICOMOS) UK to identify those landscape that can be considered of importance within Wales based upon a clear set of criteria. The eastern extent of Blaenavon RLOHI lies 1.7km to the west of the site.
Conservation Area	The historic core of Abergavenny Town Centre is designated as a Conservation Area. This reflects the historic core town centre and its medieval core, focussed on the Castle and St Mary's Church and the distinctive medieval layout of roads and burgage plots.
Access and recreation	The study area contains a network of local public footpaths and bridleways. There are also promoted long distance footpaths including: • Cambrian Way. This extends broadly north to south through Abergavenny and the wider study area. At its closest point it is around 1km to the east of the site. • Beacons Way. This route extends through the town of Abergavenny north and east through the study area. At its closest point it is around 50m to the west of the site boundary. • Usk Valley Walk. This follows the eastern bank of the River Usk and is around 1.7km to the south-west of the site at its closest point.

APPENDIX 2: LANDSCAPE CHARACTER AREAS

Abergavenny (MNMTHVS072).	This area extends across the urban area bordering the site to the west. It is evaluated as **moderate** overall. Key characteristics are: • Historic market town with distinctive core centred on the castle, St Mary''s priory church and the distinctive town hall. • Positive relationship with the River Usk valley floor • Scenic views to the Sugar Loaf and Blorenge enhance sense of identity.
Northern Hills (MNMTHVS015).	This area extends across the site and a broad tract of Monmouthshire to the east of the study area. It is evaluated as **High** overall. Key characteristics are: • Small irregular fields of permanent pasture enclosed by a managed hedges, hedgerow trees and treelines and small-scale woodland blocks, including ancient woodlands and alder woodland and orchards. • A gently rolling lowland landform. • Distant views, notable to the Blorenge and the Sugar Loaf and more locally to Ysgyryd Fawr and Fach. • The tranquil, intimate character away from the main traffic routes. • The distinctive small watercourses with associated riparian vegetation. • Sparsely settled with smaller villages and a predominantly traditional agricultural appearance.
Blorenge BBNP LCA 15 Blorenge. LANDMAP MRTHRVS840.	This area extends across upland to the west of the study area. It is evaluated as **outstanding** overall. Key characteristics are: • A distinctive landform with scenic views in and out across the Usk Valley to the Sugar Loaf and Black Mountains. • Strong sense of place reinforced by panoramic views and as an upland hill important as a landmark defining the Usk Valley. • Open exposed moorland of rock outcrops and scree-slopes with remnant stone walls and scattered windswept hawthorn scrub on lower slopes. • Remote with an absence of settlements. • Lower and mid slopes contain a traditional patchwork of managed hedges, hedgebanks, hedgerow trees and their native species diversity. • Important/high industrial heritage and cultural values associated with Blaenavon.
Ysgyryd Fach MNMTHVS013	This area extends into the site and extends to the immediate east. It is evaluated as **high** overall. Key characteristics are: • The hill is a distinctive and attractive dome rising from the lower ground and forming a visual focus and a backcloth to Abergavenny and to Coldbrook house and surrounding lower lying land. • Dominated by a block of mixed deciduous and coniferous woodland. • Large pasture fields on lower slopes enclosed by managed hedges. • Sparsely settled with small-scale traditional farmsteads and crossed by a network of footpaths.

Raglan Hinterland (MNMTHVS038).	This area extends across a small part of the study area to the southeast. It is evaluated as **high** overall. Key characteristics include: • Gently rolling domesticated mixed arable and pastoral lowland, diverse and intimate in character. • Well-settled landscape with numerous roads. Settlement forms a mixture of country estates, scattered houses and small villages, with farm complexes both large and small.
Ysgyryd Fawr (The Skirrid) BBNP LCA 12. LANDMAP MNMTHVS012.	This area extends across the highpoint to the north-east of the study area. It is evaluated as **outstanding** overall. Key characteristics include: • A distinct isolated hog-backed hill which forms a focal point of outstanding scenic quality within the surrounding lower lying landscape. • Long panoramic views towards the Sugar Loaf in the west, the Blorenge and Abergavenny to the south-west • Remote and isolated, windswept landscape with scattered scrub and hawthorn inter-mixed with bracken, heath and semi-natural grassland. Semi-natural woodland and coniferous plantations predominate on the lower western slopes whilst the head of the outlier remains open, dominated by rock outcrops. • Remote - There is little or no settlement other than the network footpaths which lead to the fort at the peak.
Penyclawdd Watershed (MNMTHVS051)	This area extends across the area to the north of the study area. It is evaluated as **moderate** overall. Key characteristics include: • Flat lowland landscape, forming the interface between the undulating hills and valleys and the upland plateaux of the Black Mountains. • Views out to the Sugar Loaf and Ysgyrdd Fawr to the east. • Visually open with medium to large-scale regular fields, • Well-settled and domesticated landscape, the tranquillity disturbed by the A465(T) and the railway.
Sugar Loaf BBNP LCA 12 Skirrid and Sugar Loaf . LANDMAP MNMTHVS004	This area extends across parts of the study area to the north-west. It is evaluated as **outstanding** overall. Key characteristics include: • Distinct landmark with the form of the peak. • Panoramic views towards the Blorenge and Abergavenny within the valley bottom. • Open and exposed character with a strong sense of place. • Remote with no settlement but highly popular recreational/tourism values. Access is limited to a few well used footpaths.
Sugar Loaf Scarps BBNP LCA 12 Skirrid and Sugar Loaf . LANDMAP MNMTHVS029)	This area extends across parts of the study area to the north. It is evaluated as **high** overall. Key characteristics include: • Forms the outward facing scarp slopes of the Sugar Loaf and its slopes are a distinctive and a rare feature. • Long panoramic views across Abergavenny and towards the Blorenge in the south. • Large open expanses of permanent pasture interspersed with occasional fields of arable crops dominate lower valley sides interspersed with remnant treelines and mature field trees.

- Sparsely settled landscape with scattered farmsteads, large houses and narrow roads winding their way up valley sides.

Llanover Lowland (MNMTHVS042)

This area extends across part of the study area to the west. It is evaluated as **high** overall. Key characteristics include:

- An attractive rolling lowland landscape
- An enclosed landscape with large irregular blocks of mixed deciduous and coniferous woodland, parkland and medium to large-scale fields
- A domesticated landscape with numerous large farmsteads, traditional cottages, country estates and small-scale linear settlements. It is crossed by a network of narrow roads as well as the main A4042(T) and the Newport to Hereford railway.

Upper Usk Valley (MNMTHVS046)

This area extends across the study area to the west. It is evaluated as **high** overall. Key characteristics include:

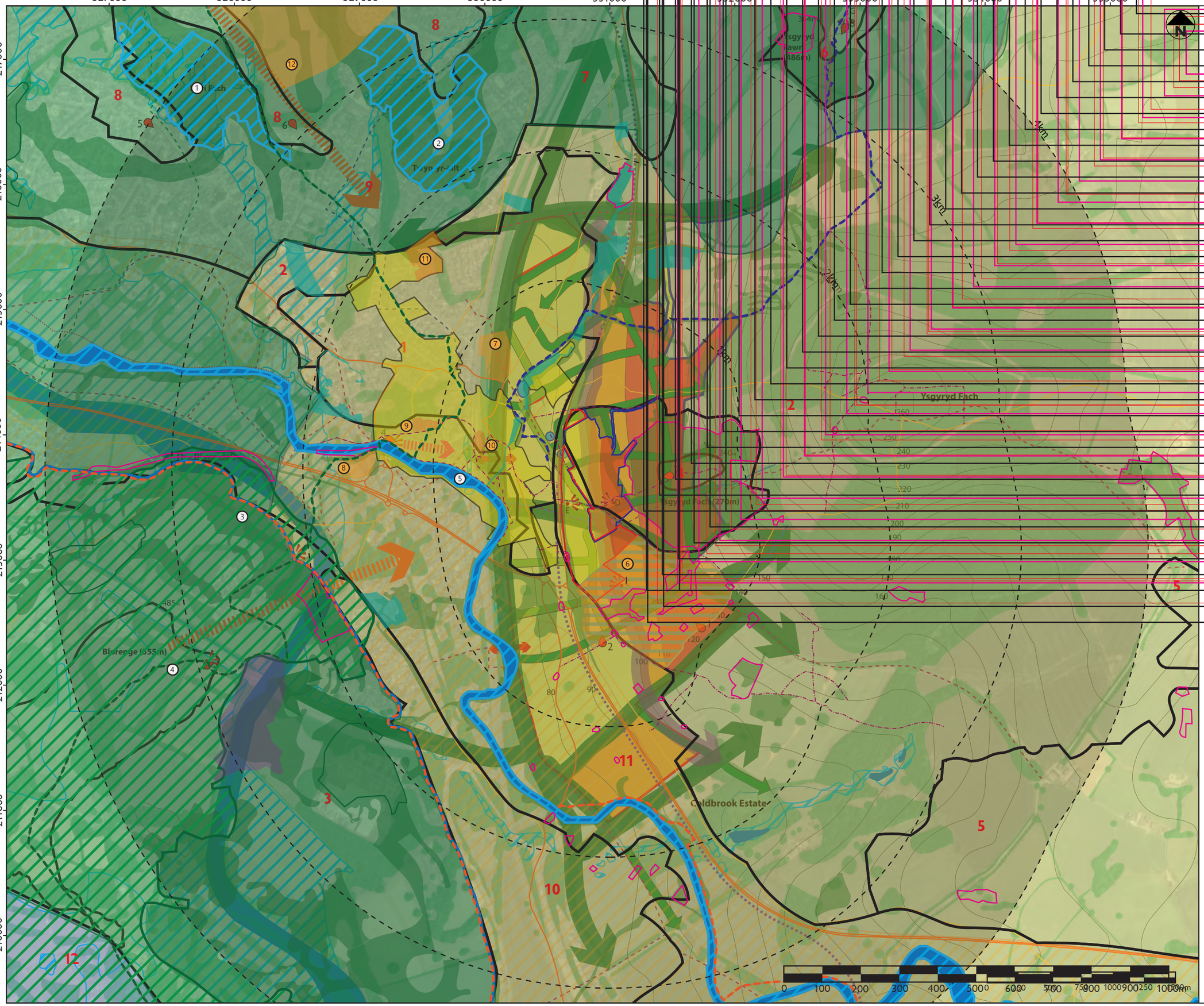
- An attractive flat open landscape with an attractive backcloth of hills and scarp slopes.
- The area has a distinct and strong sense of place as an extensive valley floor focused on the sinuous River Usk.
- Medium to large-scale fields of permanent pasture and arable crops
- Villages interspersed with large farmsteads and country estates interconnected by the B4598, A49(T) and the Newport to Hereford railway line.

APPENDIX 3: VIEWPOINT DESCRIPTIONS

VP	Location	Description of view	Co-ordinates	
			Northing	Easting
A	Cambrian Way/ Monmouthshire and Brecon Canal.	Glimpse view east from the canal towpath/Cambrian Way and seating area across the River Usk Valley to Ysgyryd Fach. The foreground is wooded and lower areas in the valley are filtered and partially obscured by vegetation. Urban areas in Abergavenny along with pylons and roads are visible in the middle distance. The site forms an attractive and distinctive green backcloth to view, with the fields rising sharply to the wooded summit of Ysgyryd Fach. Lower areas adjacent to the A465 and to the south of the site are more visually enclosed either by site-based vegetation along the A465 or by intervening foreground vegetation at the viewpoint.	28475	13071
B	Blorenge	Wide panoramic view east from the eastern edge of the scarp slope of the Blorenge. Abergavenny extends across the middle distance of the view contained on the lower-lying land of the Usk Valley. The summits of the Sugar Loaf and the Skirrid are prominent features in the view around to the north and the north-east respectively. Ysgyryd Fach adds to this sense of enclosure to the eastern edge of the town. In the distance, the view extends out into the rolling farmland of Monmouthshire.	27709	12232
C	Coldbrook Estate	Views north from the edge of the drive and approach to Coldbrook House and Estate extend across the southern part of the site only with local enclosure provided by elevated land and trees in the foreground. Abergavenny is largely obscured from the view by intervening woodland along the A465. Pylons extend across the foreground of the view and into the River Usk valley below. In the distance the distinctive summit of the Sugar Loaf forms an attractive backdrop to the view. Away to the east the Blorenge forms a more imposing backdrop to the Usk Valley.	31108	12839
D	Ysgyryd Fach	This viewpoint is located on a PRoW on the upper slopes of the site below Ysgyryd Fach and illustrates views across the site to the west and north-west. Site visibility to the east and the foreground comprises low hedges defining open pasture fields, sloping away to the low ground of the Usk Valley. To the south, the wooded brook provides local visual enclosure within the foreground. Abergavenny is clearly visible in the middle ground amongst tree planting and woodland. The Blorenge forms an imposing backdrop to the west and to the north the land rises sharply to the foothills of the Sugar Loaf, again forming an attractive backdrop to Abergavenny.	31036	13497
E	Footpath, A465	This viewpoint is located on a PRoW on the lower slopes of Ysgyryd Fach, adjacent to the A465. It illustrates views across the site to the	30611	13464

		south-east. The foreground comprises open pasture fields, rising away to the wooded high point of Ysgyryd Fach and parkland within the Coldbrook Estate to the south. The edge of the footpath to the north is enclosed by woodland along the stream corridor. Pylons extend across the skyline and into the Usk valley.		
F	Cambrian Way/Castle Meadows, Abergavenny	This viewpoint illustrates open views east from Cambrian Way/Castle Meadows at Abergavenny. The area is a popular recreation area with riverside paths and benches. The foreground comprises informal grassland focussed on the riverside with scattered mature trees and woodland. The backdrop to the view is the distinctive wooded landform of Ysgyryd Fach rising beyond the treeline of the Usk Valley. Lower parts of the site are obscured by intervening woodland and trees. More elevated fields within the site are either fully or partially visible.	29188	13980
G	The Skirrid	Open panoramic view south across rolling farmland. Ysgyyryd Fach forms a distinct wooded feature in the middle distance. The site is obscured by landform and woodland.		

APPENDIX 4: FIGURES



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- Incremental 1km buffer from site boundary
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

Statuary Designations

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- National parks - Bannau Brycheiniog and Black Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuary Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
2. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
3. Coed-y-person SSSI
4. Blorenge/Blorenge SSSI
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

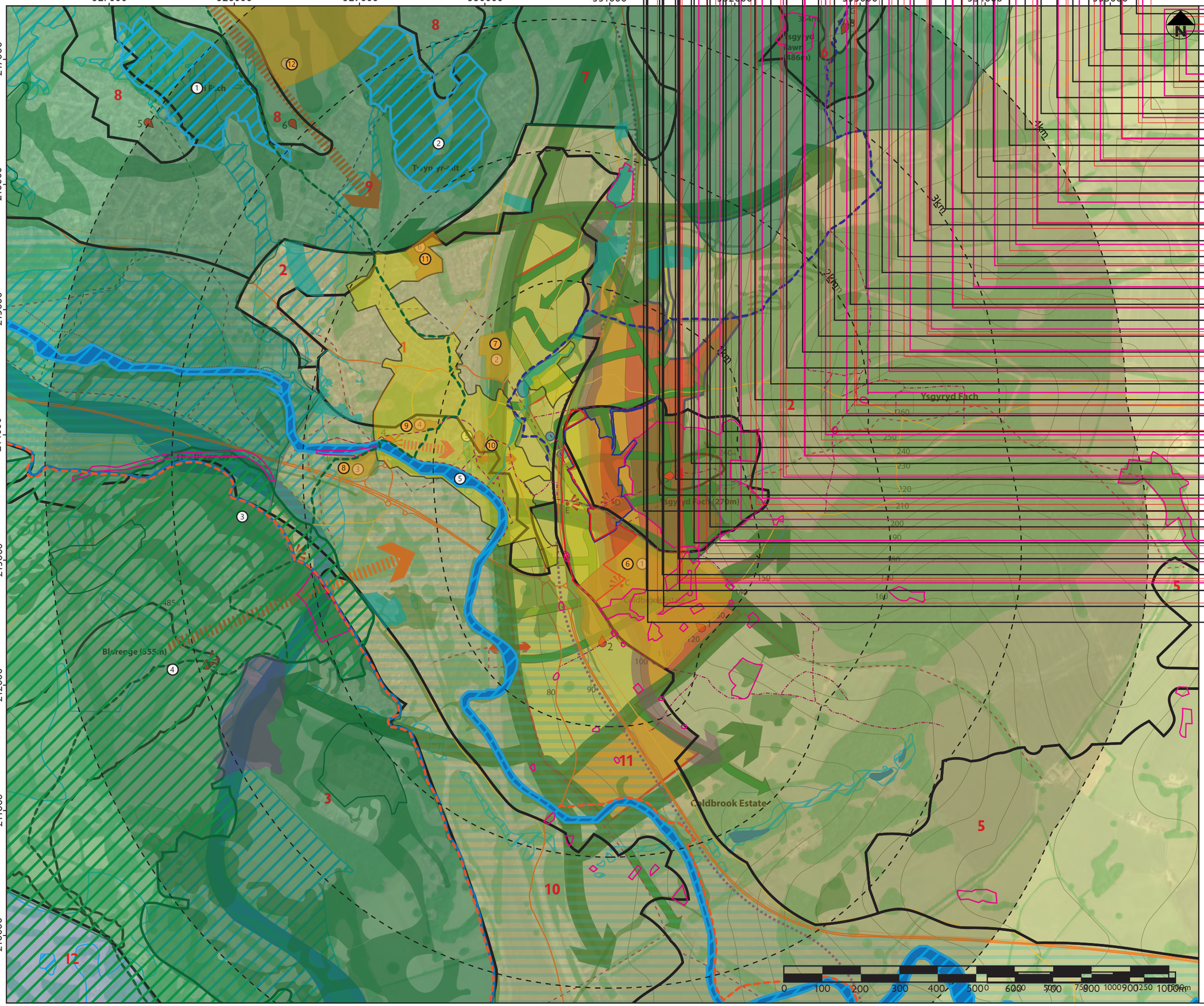
project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- Incremental 1km buffer from site boundary
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

Statuory Designations

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- National parks - Bannau Brycheiniog and Black Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuory Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
2. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
3. Coed-y-person SSSI
4. Blorenge/Bloreng SSSI
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

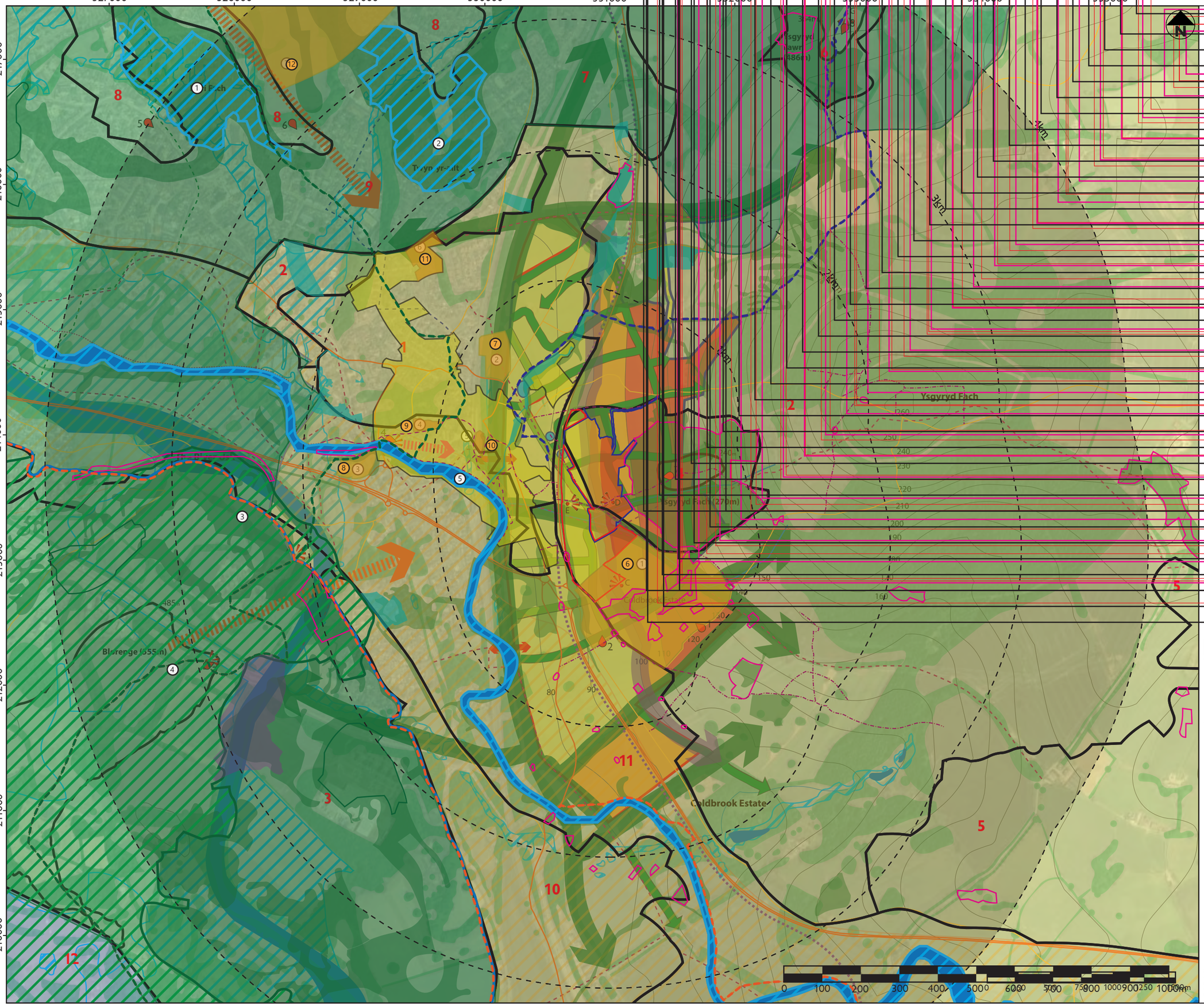
project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- ~~Incremental 1km buffer from site boundary~~
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

~~Statuory Designations~~

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- ~~National parks - Bannau Brycheiniog and Black~~ Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuory Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) ~~SAC&SSSI~~
2. Sugar Loaf Woodlands (Deri-fach Woodland) ~~SAC&SSSI~~
3. Coed-y-person SSSI
4. ~~Blorenge/Bloreng SSSI~~
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. ~~Coldbrook Historic Gardens and Parkland -~~ (Cadw/ICOMOS Register of Parks and Gardens of ~~Special Historic Interest in Wales~~).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX 5: VIEWPOINT PHOTOGRAPHS

Ysgyryd Fach



A) Cambrian Way/Monmouthshire and Brecon Canal (N28475,E13071)

Y Fal - Sugar Loaf

Ysgyryd Fawr - The Skirrid

Ysgyryd Fach

Coldbrook Estate



B) Blorenge (N27709, E12232)

Blorenge

Y Fal - Sugar Loaf



C) Coldbrook Estate (N31108,E12839)

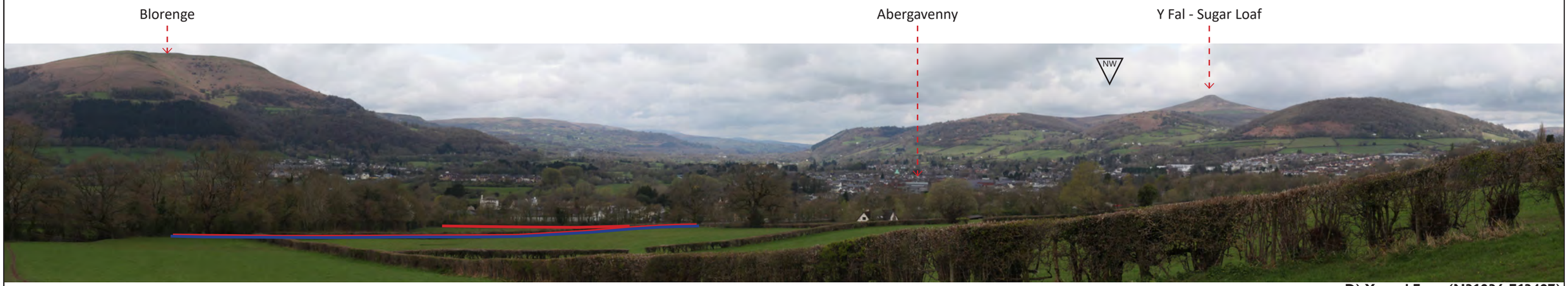
Key

Red Line Boundary

Blue Line Boundary

° project **Abergavenny East Development**	° figure Figure 3: Viewpoint Photography	° client RPS	
° doc 2488601-SBC-XX-ZZ-DR-L-003	° scale NTS@A3	° drawn JM	° date Apr 2024

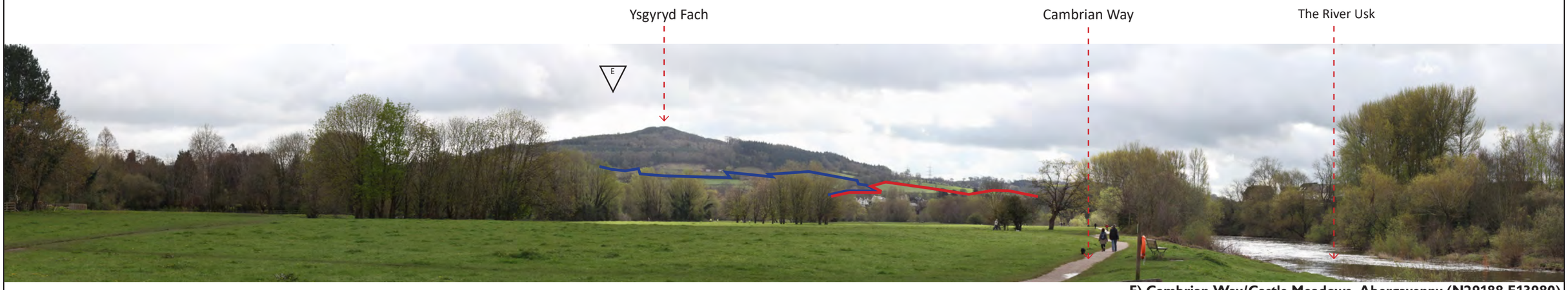
soltysbrewster



D) Ysgyrd Fawr (N31036,E13497)



E) Footpath, A465 (N30611,E13464)



F) Cambrian Way/Castle Meadows, Abergavenny (N29188,E13980)

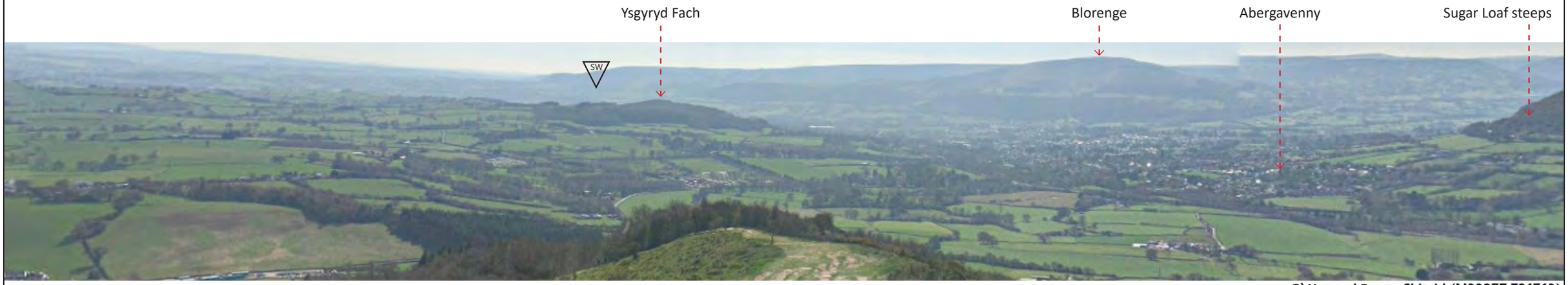
Key

Red Line Boundary

Blue Line Boundary

° project **Abergavenny East Development**	° figure Figure 4: Viewpoint Photography	° client RPS	
° doc 2488601-SBC-XX-ZZ-DR-L-004	° scale NTS@A3	° drawn JM	° date Apr 2024

soltysbrewster



G) Ysgyryd Fawr - Skirrid (N33277,E21713)

Key

Red Line Boundary

Blue Line Boundary

project	figure	client	
Abergavenny East Development	Figure 5: Viewpoint Photography	RPS	
doc	scale	drawn	date
2488601-SBC-XX-ZZ-DR-L-005	NTS@A3	JM	Apr 2024

soltysbrewster

Appendix 7

Preliminary Ecological Appraisal

COLDBROOK ESTATE
LAND EAST OF ABERGAVENNY
PRELIMINARY ECOLOGICAL APPRAISAL MARCH 2023



soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone:- 033 00 13 00 12
e-mail:- enquiry@soltysbrewster.co.uk
Web Site:- www.soltysbrewster.com

COLDBROOK ESTATE

LAND EAST OF ABERGAVENNY

PRELIMINARY ECOLOGICAL APPRAISAL

DOCUMENT REF: E2315301/DOC 01 – MARCH 2023

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	29 March 2023	[redacted]	[redacted]	[redacted]
		For Issue	30 March	[redacted]	[redacted]or)	[redacted]

CONTENTS

Summary

1.0 Introduction

2.0 Methodology

Desk study

Extended Phase 1 Habitat Survey

Survey Constraints

3.0 Results

Desk study

Extended Phase 1 Habitat Survey

Fauna

4.0 Policies and Plans

5.0 Conclusions and Recommendations

References

Appendices

Appendix I Site Location Plan

Appendix II Desk Study Information Received from SEWBReC

Appendix III 2023 Extended Phase 1 Habitat Survey Plan and Target Notes

Appendix IV LDP Candidate Site Assessment Form

SUMMARY

Soltys Brewster Ecology were commissioned by RPS Group on behalf of Coldbrook Estate to undertake a preliminary appraisal of an area of land to the east of Abergavenny, Monmouthshire. The area is being promoted as part of a larger strategic candidate site via the LDP review process. The ecological baseline conditions within the land owned by Coldbrook Estate (Candidate Site) were established in March 2023 through a combination of desk study and Extended Phase 1 Habitat Survey.

Desk based consultation confirmed that the candidate site does not hold any designations for nature conservation. However, the small watercourses at the site have hydrological links to the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and River Gavenny Site of Importance for Nature Conservation (SINC) which are located over 400m west of the candidate site, beyond the A465 road corridor.

The desk study returned an extensive list of records for protected fauna and flora within 2km of the candidate site. This included the identification of several bat roosts within 500m of the candidate site boundary (a single record of foraging Soprano pipistrelle *Pipistrellus pygmaeus* within the red line boundary) as well as over 172 individual records of foraging and commuting bats within the 2km search radius. The data search included records of Great Crested Newt (GCN) within 2km of the candidate site boundary with 1no. records located within 600m. Records of Otter, Badger, and other priority mammalian species such as Hedgehog were also identified within the 2km search radius. There were also a small number of Slow-Worm records with the nearest located 500m north of the site. The desk study returned an extensive list of protected and priority bird species records within the 2km radius with multiple records for species such as Barn Owl and Skylark within proximity to the candidate site.

An Extended Phase 1 Habitat survey undertaken in March 2023 identified a range of habitats present at the candidate site and immediately adjacent area including improved grassland, arable fields, poor semi-improved grassland, broad-leaved woodland, dense scrub, running water, and an extensive hedgerow network. The survey found no evidence of any invasive plant species at the candidate site.

[redacted] The linear habitat features at the site such as the hedgerow network, woodland corridor and woodland edge were considered likely to support a range of commuting and foraging bat species. The candidate site contains a number of mature/veteran trees assessed to have a high, moderate and low potential to support roosting bats and were also considered of some suitability to support nesting Barn Owl. The habitats at the candidate site were also considered likely to support nesting

[1] Soltys Brewster Ecology. (2021) Land East of Abergavenny Preliminary Ecological Appraisal.

and foraging birds with the open areas of improved grassland and arable field also considered suitable to support ground-nesting birds such as Skylark. The extensive hedgerow network and woodland was considered to be of some suitability for Hazel dormouse. Although the majority of the habitats at the candidate site (i.e. grazed improved grassland/arable) are unsuitable for reptiles, the field margins and poor semi-improved grassland located in the southern part of the candidate site contained suitable shelter, cover and basking opportunities and were considered to have a low potential to support common reptiles. No waterbodies are located directly within the candidate site boundary, however, a review of OS mapping found 2 ponds located 250m to the south of the site There are 3 small streams present within the site boundary which run generally form east to west under the A465 Rd. The habitats at the candidate site (hedgerows, woodland and to a lesser extent, improved grassland) were considered suitable to support GCN within their terrestrial phase.

Further survey work would be recommended to inform a planning submission at the candidate site and to inform any specific mitigation or licensing requirements with regards to bats, Badger, Barn owl, Great Crested newt, Hazel dormouse and reptiles. Any future vegetation works at the site, such as tree and scrub removal, would also be subject to seasonal constraints i.e. outside of the bird nesting season.

Development at the candidate site presents opportunities for both strategic & local biodiversity enhancement. The large improved/arable grassland fields were assessed as being of limited ecological interest, with features of ecological value in the context of the site primarily associated with extensive hedgerow network, woodland corridor, and other linear habitat features. Any proposed layouts should incorporate these features into the overall masterplan and aim to retain, protect and enhance the boundary features as part of a green infra-structure network.

1.0 INTRODUCTION

1.1 Soltys Brewster Ecology were commissioned by RPS Group on behalf of the landowner (Cold brook Estate) to undertake a preliminary ecological appraisal of an area of land to the east of Abergavenny. The area is being promoted as a candidate site as part of a wider strategic development allocation through the LDP review process. A survey to establish the ecological baseline conditions and identify any ecological constraints or opportunities with the site is required.

1.2 The candidate site is located to the east of Abergavenny along the A465 carriageway (central grid reference SO3079 1348) and comprises a large area of approx. 31ha (see plan in Appendix I). The candidate site and survey area mostly consist of improved grassland, arable fields, broadleaved woodland, running water and hedgerow margins.

1.3 The current report presents the findings of an ecological desk study, review of previous survey reports (SBE, 2021) and Extended Phase 1 Habitat survey undertaken at the candidate site and adjacent area in March 2023. The current report describes the existing ecological conditions as well as identifying any potential ecological constraints/opportunities associated with allocation of the site for residential development as part of the LDP review.

2.0 METHODOLOGY

2.1 In order to establish the baseline ecological conditions at the candidate site and adjacent habitats, a combination of desk-based consultation and Extended Phase 1 Habitat survey were undertaken in March 2023.

Desk study

2.2 The desk study involved consultation with the South East Wales Biodiversity Records Centre (SEWBReC) to identify any records of rare, protected or notable flora and fauna at the candidate site and within a radius of 2km extending from the central point of the candidate site. The search criteria also included information relating to the location and citation details (where available) for any sites designated for their nature conservation interest such as Sites of Special Scientific Interest (SSSIs) or Sites of Importance for Nature Conservation (SINCs).

Extended Phase 1 Habitat Survey

2.3 The fieldwork was undertaken on 10 March 2023 by a suitably experienced ecologist[2] and followed standard Phase 1 Habitat Survey protocol (JNCC, 2010) as amended by the Institute of Environmental Assessment (1995). The survey area covered land included within the candidate site boundary and observations on immediately adjacent field parcels. All habitats within and immediately adjacent to the survey area, were classified and mapped as accurately as possible. Habitats considered to have potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Eurasian badger *Meles meles* setts and dung-pits[3]). Incidental observations of birds on or flying over the site were also recorded and any incidence of invasive weed species (e.g. Japanese knotweed *Fallopia japonica*) noted.

2.4 A map of habitats was drawn up and target notes were used to identify features of ecological interest. Where possible, habitats were cross-referenced to any relevant important UK or Wales priority habitats as identified under Section 7 of the Environment Act (Wales) 2016.

2.5 During the field survey any trees or structures (e.g. single storey corrugated metal stable) at the candidate site a were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2016). The categories are as follows:

- **Known or confirmed roost**

[2] Full Member of the Chartered Institute of Ecology & Environmental Management (CIEEM)
[3] Given the sensitive nature of the information this has not been mapped on the Phase 1 map.

- **High** – A tree or structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
- **Moderate** – A tree or structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
- **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically. Or: A tree of sufficient size & age to contain PRFs (Potential Roost Features) but with none seen from the ground or features seen with only very limited roosting potential.
- **Negligible** – Negligible habitat features on site likely to be used by roosting bat

3.0 RESULTS

Desk Study

SEWBReC Records

3.1 Consultation with SEWBReC confirmed that the candidate site does not contain any designations for nature conservation. The internationally designated River Usk Special Area of Conservation (SAC) and SSSI is located ca.. 500m west of the candidate site (Table 1), and although both sites are separated by residential development and transport corridors there are a number of small watercourses and drains at the candidate site which likely flow into the River Usk. The locally designated River Gavenny SINC is also located ca... 500m west of the candidate site boundary, and supports migratory fish species, Otter *Lutra lutra* and White Clawed Crayfish *Austropotamobius pallipes* and has a direct hydrological link (tributary) to the River Usk. Similarly, the small watercourses at the candidate site are likely to drain into the River Gavenny.

3.2 Desk based consultation also identified Cwm Mill Section, Mardy SSSI and Ross Road and Maindiff Court Hospital SINCs within 1 – 1.5km of the candidate site's boundary but given the physical separation between the sites they are not likely to be impacted by the proposal and were not considered of ecological relevance (designated for habitat and geological features). To the east of the candidate site is an area of ancient woodland at Ysgyryd Fach (also an NRW Priority Area PAWS). Summary plans to illustrate the SEWBReC records are included in Appendix II.

Table 1 – Statutory and non-statutory designated sites within 1km of the candidate site boundary.

Site Name	**Citation**	**Distance from candidate site boundary.**
River Gavenny SINC	River Gavenny known to support anadromous fish species as well as resident populations of Brown/Sea Trout and Bullhead. White Clawed Crayfish, Otter and Dipper also present.	Approx. 500m west
River Usk SAC	Designated for the presence of Annex II species including Sea Lamprey, Brook Lamprey, River Lamprey, Twaite Shad, Atlantic Salmon, Bullhead and Otter. Supports Annex I habitat; Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation.	Approx.500m west
River Usk (Lower) SSSI	*See above.* *The River Usk (Lower Usk) is a rare example of a large mesotrophic lowland river which has not been subject to significant modification by man. The River Usk (Lower Usk)*	*Approx. 500m west*

	supports a wide range of riverside breeding birds, important assemblages of craneflies including rare and scarce species, Otter and also provides valuable feeding and roosting habitats for several bat species including Daubenton's bat.	
Ross Road SINC	Diverse site supports species-rich MG1 neutral grassland, broad-leaved woodland, scrub and two watercourses.	Approx. 1.5km north-west
Maindiff Court Hospital SINC	Site supports species rich MG5/6 grassland, mature parkland trees and scrub.	Approx. 1.5km north

3.3 The data search returned an extensive list of species records within a 2km radius of the candidate site -1,048 Priority Species, 355 Species of Conservation Concern and 165 Locally Important Species. The following priority species have been recorded within the site boundary Kestrel *Falco tinnunculus* (S7, Bern, CITES, WBR (RSPB)), Peregrine Falcon *Falco peregrinus* (Bdir1, WCA 1.1., Bern, CITES), Red Kite *Milvus milvis* (Bdir1. WCA 1.1, CITES), Weasel *Mustela nivalis* (NRW, Bern), and Bluebell *Hyacinthoides non-scripta* (WCA8). The following locally important species have been recorded within the site boundary Rounded Pygmy -moss *Acaulon muticum* (RDB1 (Wales), RDB2 (UK)), Monks-hood *Aconitum napellus,* and Black Horehound *Ballota nigra.*

3.4 The desk study search returned a total of 172no. individual bat records within a 2km search radius of the candidate site. One record of a foraging Soprano pipistrelle was returned within the red line boundary. Bat records within the 2km buffer include the identification of separate bat species including Whiskered bat *Myotis mystacinus*, Common and Soprano Pipistrelle, Brown Long Eared bat Noctule *Nyctalus noctule,* Brandts bat *Myotis brandit* and Lesser Horseshoe bat *Rhinolophus hipposideros*. Seven bat roosts were confirmed within 1km of the site for including day roosts/occasional male roost for Common pipistrelle *Pipistrellus pipistrellus*, Whiskered bat *Myotis mystacinus*, Brown long eared *Plectus auritus*, Natterers bat *Myotis nattereri* and a maternity roost (species not provided).

3.5 Other mammalian records in the data search results included an Otter sighting along the River Gavenny and field sign (spraint) recorded at the River Usk, located within 200m of the western candidate site boundary. A historic record (dated 2005) of a Badger sett located Ysgyryd Fach was included in the data search. There was also a Badger road kill reported along the A465 carriageway ca. 200m west of the site, as well as an additional road kill sighting recorded ca... 1km south west of the candidate site. Other S7 priority listed small mammals recorded in a 2km radius of the candidate site include Hedgehog *Erinaceus europaeus*, Polecat *Mustela putorius*, and Stoat *Mustela erminea.*

3.6 The data search returned a record of Great Crested newt *Triturus cristatus* located ca. 600m from the western site boundary within a garden pond(2007). A further 17no. records were identified within 2.5km of the candidate site boundary. Other amphibians such as Smooth newt *Lissotriton vulgaris* and Palmate newt *Lissotriton helveticus* have also been recorded within garden ponds located within 150m of the candidate site boundary. There are multiple records for Common frog *Rana temporaria* and Common toad *Bufo bufo* within the wider landscape, the nearest of which is located ca. 100m south-west. There were a limited number of common reptile records included in the desk study results (8), with Slow-worm *Anguis fragilis* recorded on five occasions with the nearest record 500m of the north western site boundary and a single record for Grass snake *Natrix Helvetica* recorded approximately 1km to the west.

3.7 An extensive number of protected and priority listed bird species records returned within the 2km search radius (189no. records), the majority of which were associated with the habitats along the River Usk to the west of the site. In a 1km search radius from the candidate site, records of bird species listed under Schedule 1 of the Wildlife and Countryside Act (1981) (as amended) include those for Barn owl *Tyto alba*, Peregrine *Falco peregrinus*, Redwing *Turdus iliacus*, Fieldfare *Turdus pilaris*, Common Crossbill *Loxia curvirostra*, Brambling *Fringilla montifringilla*, Goshawk *Accipiter gentilis*, Hobby *Falco 11pprox.11* , Kingfisher *Alcedo atthis,* Merlin *Falco coumbarius* and Golden Oriole *Oriolus oriolus*. Records of S7 priority listed bird species include those for Bullfinch *Pyrrhula pyrrhula,* Cuckoo *Cuculus canorus*, Linnet *Linaria cannabina*, Spotted Flycatcher *Muscicapa striata*, Skylark *Alauda arvensis*, Curlew *Numenius arquata*, Tree Pipit *Anthus trivialis*, Kestrel *Falco tinnunculus*, Wood Warbler *Phylloscopus sibilatrix*, Marsh Tit *Poecile palustris*, Hawfinch *Coccothraustes coccothraustes*, Yellowhammer *Emberiza citrinella*, Yellow Wagtail *Motacilla flava*, Willow Tit *Poecile montana*, Lesser Redpoll *Acanthis cabaret*, House Sparrow *Passer domesticus*, Dunnock *Prunella modularis*, Song Thrush *Turdus philomelos* and Nightjar *Caprimulgus europaeus*. Given the size of the site and close proximity to the River Usk there is likely to be some interchange of species, particularly those associated with scrub, hedgerow or woodland habitats.

3.8 The data search returned some records of protected fish species, all associated with the River Usk and River Gavenny. There are records of Atlantic Salmon *Salmo salar*, Brown/Sea Trout *Salmo trutta*, Eel *Anguilla Anguilla* and Sea Lamprey *Petromyzon marinus* within these watercourses.

3.9 The data search included 150 priority listed (S7) invertebrate species within close proximity to the candidate site. There were individual lepidoptera records of Dusky Thorn *Ennomos fuscantaria*, Grey Dagger *Acronicta psi,* Knot grass *Acronicta rumicis*, Mouse moth *Amphipyra tragopoginis,* Garden Tiger *Arctica caja, Atethmia centrago,* Rustic *Hoplaodrina blanda*, Small Blue butterfly *Cupido minimus* and Cinnabar moth *Tyria jacobaeae*. Other S7 Priority Species invertebrate recorded include Violet Oil-beetle *Melo violaceus,* Southern Iron Blue

Mayfly *Baetis niger*, Northenr February red stonefly *Brachyptera putata* and Hornet Robberfly *Asilus crabroniformis*.

3.10 Invasive species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) such as Japanese Rose *Rosa rugosa*, Japanese Knotweed, Himalayan Balsam *Impatiens glandulifera*, Rhododendron *Rhododendron ponticum* and Giant Hogweed *Heracleum mantegazzianum* have been recorded within habitats in a 500m radius of the candidate site boundary.

Summary of the SBE 2020 Survey findings

3.11 The Phase 1 survey undertaken in 2020 (SBE 2021) found that the land to the east of the Candidate site comprised of habitats consistent with its agricultural use including improved grassland, arable fields and poor semi-improved grassland. Broad-leaved mixed woodland, dense scrub, tall ruderal, running water and ditches, hedgerows and farm buildings was also noted during the survey. The main habitat features of ecological interest included the hedgerow network, scattered trees, woodland corridors/edge, dense scrub and poor semi-improved grassland as these were considered suitable to support protected and priority species, potentially including foraging and commuting bats, nesting birds, Hazel Dormouse, Great Crested Newts and reptiles [redacted]

Extended Phase 1 Habitat Survey 2023

3.12 The distribution and extent of habitats recorded in March 2023 at the candidate site and wider survey area are illustrated on the Extended Phase 1 Habitat Plan with accompanying target notes in Appendix III. The candidate site and survey area support a range of habitat types (consistent with the previous 2020 survey and current land use) including improved grassland, arable fields, poor semi-improved grassland, hedgerows, running water, ditches, dense scrub, broad-leaved woodland, and scattered trees. A post and rail fence is present around the entire red line boundary.

Buildings/outbuildings

3.13 There was a single storey, corrugated metal stable located in Field 1 with a horse present during the survey. Access to the field was not possible during the survey however, there did not appear to be any obvious external roosting potential for use as a day roost (Negligible potential) – e.g. no dense ivy, generally unsuitable construction material (corrugated metal) for day roosting. However, the structure could be used occasionally as a night roost or feeding perch by bats as it is open to one side. Nesting birds (e.g., Swallow) could also make use of the structure during the breeding season (typically March – August).

Improved grassland

3.14 The field parcels in the northern part of the candidate site and survey area consist of grazed improved grassland fields (3 out of 8 fields surveyed). At the time of the current survey field 1 and 2 contained horses. The grassland is characterised by a short sward height and low floral diversity with species present including Perennial Rye Grass *Lolium perenne*, Annual Meadow Grass *Poa annua*, Creeping Buttercup *Ranunculus repens*, Dandelion *Taraxacum officinale* and Ribwort Plantain *Plantago lanceolata*.

Plate 1 – Improved grassland field (F3)



Arable

3.15 The site contains five fields comprising of arable cropland located at the southern part of the site (F4-8). The current crop at the time of the survey was a type of brassica. The field margins contained Perennial rye grass/ Annual meadow grass, with stone/rubble piles present (assume to have been removed during the ground preparation prior to sowing).

Plate 2 Field margin of arable field 7



Poor semi-improved grassland

3.16 There is a section in Field 8 that has not been sown with an arable crop. This area of grassland has been categorised as poor semi-improved. Species present including Bent grasses *Agrostis sp*., Foxtail *Alopecurus sp*., Tufted Hair Grass *Deschampsia cespitosa*, Selfheal *Prunella vulgaris*, Silverweed *Potentilla anserina*, Dock *Rumex sp*, and Soft rush *Juncus effusus*. The western field boundary was considerably wetter during the survey as run-off from the field is naturally flowing into the stream on the western site boundary.

Broad-leaved semi-natural woodland

3.17 The candidate site contains a wooded stream corridor located towards the centre of the site boundary (Plate 3). The broad-leaved woodland corridor largely consists of tall mature Oak *Quercus sp*. and Ash *Fraxinus excelsior* trees. There are also stands of Hazel *Corylus avellana*, Hawthorn *Crataegus monogyna*, Holly *Ilex aquifolium*, Field Maple *Acer campestre*, Apple *Malus sp*., Rose *Rosa sp*. and Elder *Sambucus nigra*. The woodland ground-flora consists of Hart's-Tongue Fern *Asplenium scolopendrium*, Ivy *Hedera helix* and Male fern *Dryopteris filix-mas*.

3.18 A collection of mature broad-leaved trees, located within F6 were also categorised as broad-leaved woodland that include several closely grouped mature Ash, Sycamore, and Beech *Fagus sylvatica*. There was limited understorey vegetation present during the survey.

3.19 The fields and hedgerow margins at the candidate site and wider survey area support a number of solitary standing broad-leaved trees. These trees (mainly Oak and Ash) appear veteran in size and appearance and contain various roosting opportunities for bats and birds.

Plate 3 – Woodland corridor intersecting the north and southern part of the candidate site.



Dense and scattered scrub

3.20 There are small areas of dense/continuous scrub within the candidate site boundary. The western boundary of the candidate site (running parallel to A465) consists of a combination of woodland, scattered trees an outgrown hedge with a dense Bramble understory. The hedgerow along the southern boundary of Field 7 is predominantly unmanaged contains a section of dense Gorse *Ulex sp*. and Bramble.

Hedgerows

3.21 The candidate site and wider survey area supports a large hedgerow network containing a mixture of defunct and intact hedges. In total, 11 no. separate hedgerows were recorded.

<u>Intact species-poor</u>

3.22 The majority of the hedgerows located at the candidate site and wider survey area were categorised as intact species-poor hedgerows and consisted either of a single species (namely Hawthorn) or a mixture of Hawthorn, Hazel, Blackthorn, Holly and Field Maple. Most of these hedgerows were also found to be intensively managed and had been cut/trimmed to a height of c.. 1.5 – 2.0m.

3.23 Many of the hedgerow margins within fields containing livestock/improved grassland were found to be intact species-poor or outgrown hedges. Similarly, to the hedgerows described in paragraph 3.22, the defunct hedges at the site consisted either of a single species or a mixture of a small number of woody species. Fences were present around these fields.

Species-rich with trees

3.24 The candidate site and wider survey area contained several hedges which was considered to be species-rich hedgerows with trees. The south eastern field margin at field 7 contained a mixture of broad-leaved species with Oak, Ash, Holly , Hazel and Hawthorn present. A species-rich hedgerow with trees also lines the border of the candidate site to the A465 carriageway (H36). The hedge contains a number of mature Sycamore, Oak, Hazel, Ash, Field Maple, Birch and Willow trees.

Plate 4-Species rich hedgerow with trees (south eastern boundary of field 7)



Species-poor with trees

3.25 The site contains a single species-poor hedgerow with trees, located namely along the southern candidate site boundary between field 6 & 7 . The hedge mainly consists of Hawthorn, Holly and bramble with several mature trees including Field Maple, Oak and Ash.

Running water

3.26 The site supports a series of small streams and ditches. The largest watercourse at the site is located within the woodland corridor towards the centre of the candidate site. The stream comprises of a rocky and muddy substrate, is narrow, fast-flowing(at time of survey), steep-sided and shallow in depth (<5cm) although flow and depth is likely to be seasonal. The stream corridor also contains a lot of woody debris and leaf litter. The stream flows from east to west before entering a culvert under the A465 carriageway. A review of OS Mapping indicates that the stream later joins the River Gavenny located over 450m to the west of the candidate site (which links to the River Usk).

3.27 There are also a number of small streams running at the base of the hedgerow network. These streams are ca. 1m wide and 20cm deep and likely only hold water following periods of heavy rainfall. Similar to above, the streams converge before entering a culvert off-site which later links to the River Gavenny.

3.28 There is a larger stream located on the western side of Field 8. This watercourse comprises of rocky/stone substrate-very little/no submergent vegetation at the time of the survey. It was approximately 1m wide and 30cm deep and relatively slow flowing. The stream corridor contained several mature trees and understorey vegetation consistent with that of a typical wooded stream e.g. Male Fern, Harts tongue Fen, Hemlock Water dropwort. The steam flowed north then west into the adjacent broad-leaved woodland and likely into the River Gavenny on the other side of the A465.

Plate 5-Stream located on the western boundary of Field 8



Invasive species

3.29 The survey found no incidences of any invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) at the candidate site or immediately adjacent areas.

Fauna

3.30 In the course of the survey, a search of field signs for protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report, these species meet any of the following criteria:

- Species protected by British or international law;
- Priority species included on Section 7 (Environment Act, Wales);
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists);

Badger

[redacted]

Bats

3.33 Whilst the majority of the habitats at the site (i.e. improved grassland and arable field) provide limited foraging resources for the bats, other ecological features including the hedgerow network, mature trees and woodland/stream corridors were considered suitable to support a range of foraging and commuting bat species and are likely to act as important habitat corridors for bats in the wider landscape.

3.34 The survey identified a large number of trees at the site with potential to support roosting bats. This included 9no. trees with a high potential to support roosting bats, 12no. trees with moderate potential and 10 trees,

[4] Sensitive information – references to the exact location of Badger setts at the site have been removed from this document and supporting plans.

mainly associated with the boundary vegetation with low potential (see notes in Appendix III). The mature Oak and Ash trees located within the woodland corridors were collectively considered to be of a moderate/high potential to support roosting bats. Scattered trees at the site were found to contain a number of potential roost features (PRFs) in the form of woodpecker holes, cavities, split bark, deadwood and thick ivy stems. The majority of the isolated trees located within the improved/arable grassland fields were found to be in a poor condition (including a number of standing deadwood) and contained numerous PRFs including large cavities and were considered suitable to support a number of roosting bats.

Birds

3.35 A number of birds were seen/heard at the site during the survey. This included Buzzard *Buteo buteo*, House Sparrow, Tree creeper *Certhia familiaris,* Red Kite *Milvus milvus,* Coal tit *Periparus ater,* Blue Tit *Cyanistes caeruleus*, Blackbird *Turdus merula*, Robin *Erithacus rubecula*, Wren *Troglodytes troglodytes*, Magpie *Pica pica*, Rook *Corvus frugilegus* and Carrion Crow *Corvus corone*. Of the species noted, House Sparrow are listed as priority species under Section 7 of the Environment Act (Wales) (2016). The habitats at the site such as the hedgerow network, dense scrub, woodland and scattered trees were considered likely to support a number of nesting and foraging bird species. There were a number of bird nests noted within the tree canopies. Some of the trees assessed to have high/moderate potential to support roosting bats also contained suitable features (i.e. large cavities) for use by nesting Barn Owl although no pellets or other evidence of use was noted during the current survey. The desk study also contained two records of nesting Barn owl within trees at Ysgyryd Fach located east of the candidate site. The large open areas of improved grassland and arable field provide suitable habitats for ground-nesting bird species such as Skylark although none were heard/seen during the current survey.

Great Crested Newt

3.36 No waterbodies were identified within the immediate site boundary. The habitats around the field margins and boundaries of the site (i.e. hedgerow network and woodland edge) were considered suitable to support Great Crested Newt within their terrestrial phase. The desk study also returned two records of Great Crested Newt within 600m of the candidate site. GCN are known to disperse up to 250m from breeding ponds and may travel further in search of higher quality habitats e.g. woodland patches within an arable landscape (Langton *et al.,* 2001). As such, the habitats at the candidate site (in particular towards the northern extent of the site) were considered to have a low potential to support GCN within their terrestrial phase.

Hazel Dormouse

3.37 Although the desk study did not identify any records of Hazel Dormouse *Muscardinus avellanarius* within 2km of the candidate site, the linear habitat features at the site such as the species-rich hedgerow margins and

woodland corridors were considered suitable to support the species. These features contain a number of potential food sources (e.g. Hazel, Oak, Bramble), are structurally suitable containing a continuous understorey layer and have existing connectivity to larger woodland parcels in the wider landscape which could support a source population (e.g. at Ysgyryd Fach and A465 corridor). Many of the hedgerows located towards the north between the improved(grazed) grassland and the arable fields to the south were found to either be defunct or intensively managed (regularly cut/trimmed) and were not considered suitable to support dormouse. Gnawed hazelnuts collected during the current survey were attributed to either squirrel, or woodmouse.

Reptiles

3.38 The majority of the habitats located at the candidate site and adjoining area (e.g. improved grassland and arable field) were considered of limited suitability to support reptiles. The grazed areas of improved grassland lack any suitable cover or shelter for reptiles and are limited in foraging resources. However, field margins around the arable fields and in particular field 8, containing poor semi-improved grassland provide suitable cover, foraging resources and basking opportunities and could support a small number of common reptiles such as Slow-Worm, which has been recorded within 300m of the candidate site's boundary. However, this habitat is relatively isolated within the arable/agricultural landscape and the likelihood of reptiles being present was considered to be low.

Otter and Water Vole

3.39 The habitats at the site were not considered suitable to support Otter or Water Vole *Arvicola amphibius*. The watercourse running through the woodland corridor and drainage ditches are both small in size/depth and are unlikely to support sufficient prey resources for Otter. The wet ditches (as described in paragraph 3.25 – 3.26) lack any bankside vegetation capable of supporting Water Vole. As such, no further consideration is given to Otter and Water Vole during the current report but further consideration may be required with any detailed further planning application e.g. CEMP to allow for occasional use by Otter (the species is known to be present along the Usk and Gavenny corridors to the west). .

White-Clawed Crayfish

3.40 Although the SEWBReC search did not return any records of White-Clawed Crayfish *Austropotamobius pallipes* within 2km of the candidate site, the designation description for River Gavenny SINC includes reference to the presence of the species within a tributary just within the Brecon Beacons National Park boundary. A search of NBN Atlas[5] identified two historic crayfish records dating from 1993 and 2000 associated with watercourses ca. 2km north and 3km north of the candidate site. The watercourses within the woodland corridors at the site were considered of limited suitability to support White-Clawed Crayfish. Although the watercourse at Target

[5] https://nbnatlas.org/

Note 13 contains a rocky substate, soft banks and suitable refuges (e.g. rocks, logs and fallen leaves) the stream was flow-flowing and very shallow at the time of the survey (water depth <5cm). Crayfish are typically associated with watercourses 0.75m to 1m in depth but have been known to occasional use shallow watercourses with a water depth of around 5cm (Holdich, 2003). However, it is unlikely a watercourse this shallow could continually support a crayfish population in the long-term. In addition, there are no direct hydrological links to the watercourses where the historic crayfish records are located. No further consideration is given to the development impacts on White Clawed-Crayfish.

Invertebrates

3.41 No invertebrates were noted during the survey which is likely to be a result of the time of year, cooler temperatures and snow that had fallen earlier in the day. As described for other species, the improved grassland and arable fields are likely to provide little (if any) resources for species of conservation interest. Other habitats at the site, including hedgerows, streams/ditches, mature trees and woodland will however support a more diverse assemblage of invertebrates.

5.0 POLICIES AND PLANS

4.1 The following local and national planning policy relating to nature conservation and biodiversity are considered of relevance to the site.

Planning Policy Wales (2021)

4.2 This document set out the land use planning policies of the Welsh Government with Chapter 6 dealing with Distinctive and Natural Places which covers Biodiversity and Ecological Networks. The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN's), with TAN 5 addressing Nature Conservation & Planning.

4.3 TAN 5 identifies a number of key principles, which the town and country planning system in Wales should consider. Those relevant are detailed below:

- Work to achieve nature conservation objectives through a partnership between local planning authorities, Natural Resources Wales (NRW), voluntary organisations, developers, landowners and other key stakeholders;
- Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time;
- Ensure that the UK's international obligations for site, species and habitat protection are fully met in all planning decisions;
- Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;
- Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;
- Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;
- The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

Environment (Wales) Act, 2016

4.4 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

Section 6 – Biodiversity and resilience of ecosystems duty

4.5 Section 6 of the Act places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

Section 7 – Biodiversity lists and duty to take steps to maintain and enhance biodiversity

4.6 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

Local Planning Policy

Monmouthshire County Council Local Development Plan (2011 to 2021)

4.7 The Monmouthshire County Council LDP was adopted in February 2014, replacing the Monmouthshire Unitary Development Plan (UDP) to become the adopted development plan for the County (excluding the part within the Brecon Beacons National Park). Following a review in 2018, the current plan will be replaced with a revised LDP (2018 to 2033) and is scheduled to be adopted in 2021. Policies of relevance to the proposed site within the current LDP include:

Key Policy:

3. VALUING OUR ENVIRONMENT

Rural Environment and Biodiversity

- *Monmouthshire has major biodiversity and landscape resources that need to be preserves and should be protected, managed and enhanced.*
- *There is a need to improve connectivity within the landscape through protecting and improving existing wildlife networks and corridors and creating new linkages to allow species to move and adapt to climate change impacts.*

The LDP seeks to influence these issues by:

- *Ensuring that new development does not cause harm to international, national and locally protected sites and species and that where appropriate and necessary, avoidance, mitigation and compensation measures are incorporated, while ensuring that new benefits for Biodiversity are explored.*

- *Undertaking a Habitats Regulations Assessment to ensure that the cumulative effects of development in Monmouthshire and adjoining areas do not result in harm to internationally designated nature conservation sites.*
- *Ensuring that biodiversity is considered in any development in order to protect any existing interest on the site and encourage biodiversity enhancements where necessary.*
- *Protecting high quality landscapes throughout the County, paying particular attention to those contained in the Wye Valley AONB and in the setting of the Brecon Beacons National Park.*

Detailed Policies:

STRATEGIC

Policy S13 – Landscape, Green Infrastructure and the Natural Environment. Development proposals must:

1. Maintain the character and quality of the landscape by:

(i) identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;

(ii) protecting areas subject to international and national landscape designations;

iii) preserving local distinctiveness, sense of place and setting;

(iv) respecting and conserving specific landscape features, such as hedges, trees and ponds;

(v) protecting existing key landscape views and vistas.

2. Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure network.

3. Protect, positively manage, and enhance biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them.

4. 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.

LANDSCAPE AND NATURE CONSERVATION

Policy LC1 – New Built Development in the Open Countryside

"...new built development will only be permitted where all the following criteria are met:

d) the development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity or local amenity value"

GREEN INFRASTRUCTURE

Policy GI1 – Green Infrastructure

Development proposals will be expected to maintain, protect and enhance Monmouthshire's diverse green infrastructure network by:

a) Ensuring that individual green assets are retained wherever possible and integrated into new development. Where loss of green infrastructure is unavoidable in order to secure sustainable development appropriate mitigation and/or compensation of the lost assets will be required;

b) Incorporating new and /or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off-site.

NATURE CONSERVATION AND DEVELOPMENT

Policy NE1 – Nature Conservation and Development

Development proposals that would have a significant adverse effect on a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or on the continued viability of priority habitats and species, as identified in the UK or Local Biodiversity Action Plans or Section 42 list of species and habitats of importance for conservation of biological diversity in Wales, will only be permitted where:

a) the need for the development clearly outweighs the nature conservation or geological importance of the site; and

b) it can be demonstrated that the development cannot reasonably be located elsewhere.

Development proposals shall accord with nature conservation interests and will be expected to:

5) *Retain, and where appropriate enhance, existing semi-natural habitats, linear habitat features, other features of nature conservation interest and geological features and safeguard them during construction work;*

ii) Incorporate appropriate native vegetation in any landscaping or planting scheme, except where special requirements in terms of purpose or location may dictate otherwise;

iii) Ensure the protection and enhancement of wildlife and landscape resources by appropriate building design, site layouts, landscaping techniques and choice of plant species;

iv) Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 The combination of desk study and Extended Phase 1 Habitat survey identified a range of habitats at the candidate site and adjacent areas including improved grassland, arable field, poor semi-improved grassland, broad-leaved semi-natural woodland, dense scrub, running water and an extensive hedgerow network. The areas of grazed improved grassland and arable fields were considered of limited ecological importance and represent the area of the candidate site most suitable for any proposed development. Habitat features of ecological interest at the site including the hedgerow network, scattered trees, woodland corridors/edge, dense scrub and poor semi-improved grassland were considered suitable to support protected and priority species, potentially including foraging and commuting bats, nesting birds, Hazel Dormouse, Great Crested Newt and reptiles – for which further consideration and/or targeted survey work would be required as part of a future planning submission. [redacted] Many trees within, and immediately adjacent to the candidate site boundary were assessed to have potential to support roosting bats.

Badger

[redacted]

[redacted]

[redacted]

[redacted]

Bats

5.6 The survey identified several trees with varying potential to support roosting bats including 9no. with a high potential, 12no. with moderate potential and at least 10low potential have been included in these figures, however there are a greater number of trees present within the site boundary and wooded strip that were inaccessible during the time of the survey. Any future development at the candidate site should seek to retain any trees identified as having potential to support roosting bats. However, given the current condition of some trees at the site (e.g. standing deadwood and trees with damage) some would likely need to be removed for development and/or H&S reasons – in this case further survey work (presence/absence surveys) would be required.

5.7 The best practice guidelines (BCT, 2016) recommend that for trees with high bat roost potential 3no. survey visits are undertaken between May – September comprising of at least one separate dusk emergence and dawn re-entry survey. For trees with moderate potential 2no. survey visits should be undertaken comprising of at least one separate dusk and dawn survey. Given that many of the trees are easily accessible a potential roost feature (PRF) inspection could be undertaken on all trees identified as having low, moderate and high potential to determine the presence/absence of roosting bats (dependant on health and safety restrictions). A PRF inspection would involve the use of tree climbing equipment/ladder and endoscope to physically inspect potential roost features for evidence of bats (e.g. live/dead bats, droppings and feeding remains). This survey can be undertaken at any time of year.

5.8 Trees assessed to have a low potential do not require any further survey work under the BCT (2016) guidelines. However, on a precautionary basis if any trees with low potential were to be removed as part of any future

development a prior inspection of potential roosting features would be undertake prior to soft-felling approach would be recommended. Trees should be section felled with cut tree limbs carefully lowered and left grounded overnight to allow any bats present to leave (Jackson, 2015).

5.9 The linear habitat features at the candidate site and wider survey area including the extensive hedgerow network, woodland corridor and woodland edge were considered likely to support a range of foraging and commuting bats species – the desk study returned an extensive list of bat field records within a 2km radius of the site. Given the scale of the candidate site further activity surveys (manual transects and automated surveys) would be required to establish how bats are using the candidate site to inform any mitigation/avoidance measures for a planning submission and to inform development layout. Based on the availability of suitable habitats at the candidate site the minimum level of survey recommended in the best practice guidelines (BCT, 2016) would be considered appropriate in the first instance to achieve a representative sample of bat activity across the candidate site[6]. This would comprise 3no. activity survey visits in spring, summer and autumn in appropriate weather conditions. Given the scale of the candidate site activity surveys are likely to consist of more than a single transect. Separate automated/static surveys (minimum one static per transect) would also be required, with each session recording for 5 consecutive nights *in situ* per season. The location of the static detectors (e.g. Anabat Express units) would be focused on the areas likely to be subject to development impacts (e.g. hedgerow removal).

5.10 The corrugated metal stable located in Field 1 was not accessible during the survey however, it was considered to be of negligible/low potential for roosting bats given the material, size and lack of external features noted (albeit from a distance). It is possible the structure may be used a night roost/feeding perch for a small number bats therefore it is recommended that an internal inspection of the building be undertaken. Further surveys may be required if the structure upon closer inspection reveals potential roosting features and/or evidence of bat use.

5.11 The design of any site lighting should also seek to reduce artificial light spill onto retained boundary habitats and linear features (e.g. hedgerows and surrounding woodland). These habitat features should be maintained as dark corridors for bats and other nocturnal wildlife. See lighting guidance note produced by BCT & ILP (2018) for advice on how to mitigate for impacts of artificial lighting on bats. Any future development proposal should also provision for the inclusion of bat boxes onto new residential units and retained trees.

[6] Further surveys may be required if these surveys reveal higher levels of bat activity than predicted.

Birds

5.12 The hedgerow network, scattered trees and areas of dense scrub and woodland at the candidate site were considered likely to support a number of foraging and tree/scrub nesting bird species, with the open areas of improved grassland and arable field considered suitable to support ground-nesting bird species. A number of old bird nests were noted within the tree canopies. Under the Wildlife and Countryside Act (1981) (as amended) all wild birds and their nests are protected against damage or destruction whilst in use or being built.

5.13 Given the high likelihood of ground nesting birds being present within the habitats at the candidate site further potential compensation/enhancement measures for the loss of ground-nesting bird habitats (i.e. arable field and improved grassland) should be considered at the design stage of any future development at the candidate site. This could include the inclusion of retained areas of open grassland (not publicly accessible) that would be managed to replicate farmland habitat i.e. strategic grazing.

5.14 Any future vegetation works (i.e. grassland and tree/scrub removal) would be subject to seasonal constraints and should be undertaken outside of the nesting bird season (undertaken between September – February). If this is not possible an ecologist should be present to inspect habitats for nesting birds prior to removal.

5.15 A number of the scattered trees at the site were also considered to be of some suitability to support Barn owl. In particular, the solitary standing trees assessed to have a high potential to support roosting bats were found to contain cavities of suitable size to support Barn owl (ca.80mm diameter) although no pellets or other evidence was noted around the trees during the current survey. The data search also returned records of nesting Barn owl within close proximity to the candidate site. As a Schedule 1 listed bird species Barn Owl is afforded more protection under the Wildlife and Countryside Act (1981) (as amended) meaning it is an offence to disturb any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young. It is recommended that a detailed walkover/scoping survey is undertaken to assess the suitability of trees at the candidate site for nesting Barn Owl. The findings of which would be used to determine if any further targeted survey work is required (e.g. nocturnal watches) and inform the development layout.

Great Crested Newt

5.16 Whilst no waterbodies are located within the immediate candidate site boundary, a review of OS mapping revealed the location of two ponds within 250m south of the site. No access was permitted at the time of the current survey. The candidate site was considered to offer some limited resources for Great Crested Newt in their terrestrial phase with the hedgerow margins and woodland. GCN are known to use terrestrial habitats up to 250m from breeding ponds (Langton *et al.,* 2001). The desk study identified two GCN records within

600m of the site and the pond cluster is also highlighted on the GCN and ponds connectivity plan prepared for the Monmouthshire County Council Ecological Connectivity Assessment (Gwent Ecology, 2010).

5.17 Great Crested Newt and their breeding and resting places are afforded legal protection under the Conservation of Species and Habitats Regulations (2017) and Wildlife and Countryside Act (1981) (as amended). As there is a low potential that GCN may be present within the habitats at the candidate site it is recommended that an initial Habitat Suitability Index (HSI) potentially followed by an eDNA survey is undertaken at the ponds located within 250m of the candidate site access permitting. An eDNA survey for GCN should be undertaken by a licensed surveyor during a single day time visit between mid-April to mid-June. Based on the eDNA survey findings, further survey work may be required at these ponds to establish the likely population size class assessment to inform any mitigation measures and licencing requirements at the candidate site. This would involve up to 6no. survey visits (e.g. torching, bottle trapping and egg search) between mid-March to mid-June.

Hazel Dormouse

5.18 Although the desk study did not return any records of Hazel dormouse within 2km of the candidate site, the species-rich hedgerows and woodland corridors at the candidate site and wider survey area were considered suitable to support the species. The candidate site is also located within the known range of the species (Bright *et al.*, 2006). Hazel dormouse and their breeding and resting places are also afforded legal protection under the Conservation of Species and Habitats Regulations (2017) and Wildlife and Countryside Act (1981) (as amended). Dependant on the likely impacts of any future development layout at the candidate site further survey work may be required to determine the likely presence/absence of Hazel dormouse and inform any appropriate mitigation/avoidance measures or licencing requirements.

5.19 Further surveys would involve the deployment of nest tubes along the hedgerow margins, woodland corridor and woodland boundaries at the candidate site. As per best practice guidelines (Bright *et al.*, 2006), nest tubes should be deployed in March/April and checked at monthly intervals for the presence of Dormouse up until November. A minimum of 50no. nest tubes should be deployed to sample a site. Given the scale of the candidate site it is likely >50 nest tubes will be required to achieve full coverage and demonstrate an appropriate survey effort.

Reptiles

5.20 The majority of the habitats at the candidate site and wider survey area were considered to have a limited potential to support common reptiles in their current use (grazed by livestock/arable). The grazed areas of improved grassland (in particular within the northern section of the site) lack any suitable cover or shelter for reptiles. However, the field margins of the arable fields-which are not currently managed and contain numerous

stones/boulders/rubble piles which have been ploughed from the fields, do provide some suitable habitat for reptiles although these features are relatively isolated within the agricultural/arable landscape. There are several Records of Slow-Worm were identified within 500m of the candidate site's boundary.

5.21 All UK reptiles are protected against intentional killing or injuring under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended). As such, it is recommended that the presence of reptiles is considered for any habitat management or enhancement work along the boundaries/field margins of the site. This could include, for example a supervised destructive search of rubble piles at a suitable time of year, the adoption of a phased, directional cutting methodology for any vegetation clearance and creation of habitat features as localised enhancements (e.g. log or brash piles).

Priority habitats

5.22 The candidate site contains an extensive hedgerow network. As priority habitats listed under Section 7 of the Environment Act (Wales) (2016) any future development at the candidate site should seek to retain hedgerow margins, where possible, or include the hedgerow network into the layout of any development design via a green-infrastructure management plan. This would also apply to broad-leaved woodland habitats at the candidate site which are also listed as priority habitats in Wales (as lowland mixed deciduous woodland).

Other considerations

5.23 As discussed in paragraphs 3.25-3.26 the small watercourses at the candidate site have existing hydrological links to the River Gavenny SINC and River Usk SAC SSSI. Any future development at the candidate site will need to take in consideration the potential for indirect impacts to designated sites such as changes to water quality through the discharge of surface water run-off during construction and operation.

Ecological Enhancements

5.24 Enhancement measures as part of any proposed development at the candidate site could include:

- The planting up of existing species poor/defunct hedgerows to create dense, species rich intact hedgerows using native species;
- Buffer planting between residential properties and retained hedgerows.
- The inclusion of bat and bird boxes onto new buildings and retained trees;
- The design of SuDS features to benefit biodiversity (e.g., attenuation features designed to hold water during most part of the year);
- The use of native tree and shrub species within any future soft landscape plan;

- The creation of a 130mm x 130mm gap at the bottom of garden and boundary fencing as to allow continued connectivity through the candidate site for Hedgehog and other small mammals[7];
- Installation of 'bee bricks' onto new buildings;
- Creation of reptile hibernacula using rubble/stones/felled/chipped material;
- Installation of Owl box on suitable retained trees;
- Sowing of native, locally sourced wildflower planting in suitable locations.

[7] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

REFERENCES

Bat Conservation Trust (2016) *Bat Surveys – Good Practice Guidelines*. Bat Conservation Trust, London.

Bat Conservation Trust & Institution of Lighting Professionals (2018) *Bats and artificial lighting in the UK. Guidance Note 08/18*. Bat Conservation Trust, London.

Bright, P., Morris, P. and Mitchell-Jones, T. (2006) *The Dormouse Conservation Handbook: Second Edition*. English Nature, Peterborough

English Nature (2002) *Badgers and Development*. English Nature, Peterborough.

Froglife (1999) *Reptile Survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.

Gwent Ecology (2010) *Ecological Connectivity Assessments of Settlements in Monmouthshire*. Gwent Ecology, Monmouthshire.

Holdich D (2003) *Ecology of the White-clawed Crayfish*. Conserving Natura 2000 Rivers Ecology Series No. 1. English Nature, Peterborough

Institute for Environmental Assessment (1995) *Guidelines for Baseline Ecological Assessment*. E & FN Spon, Hong Kong.

Jackson, D. (2015) *Bats & Trees – Information Leaflet*. Bat Conservation Trust, London.

Joint Nature Conservation Committee (JNCC) (2010) *Handbook for Phase I Habitat Survey. A technique for environmental audit.* JNCC, Peterborough.

Langton, T. E. S., Beckett, C. L. and Foster, J. P. (2001) *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.

Monmouthshire County Council (2014) Adopted Local Development Plan (LDP) 20011-2021.

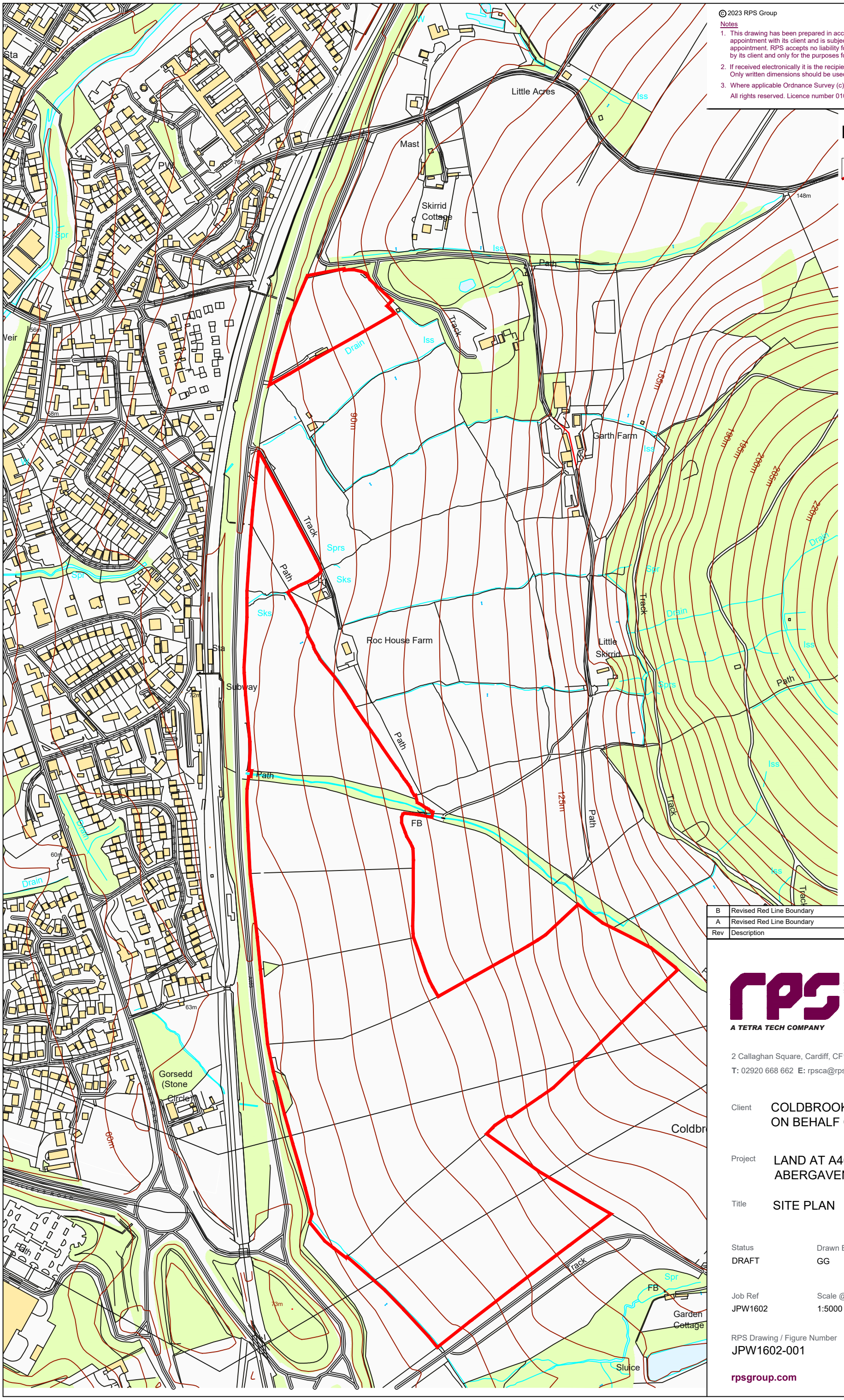
Natural England. (2013) Bat habitat assessment prior to arboricultural operations. Guidance for Natural Englands National Nature Reserves.

Soltys Brewster Ecology. (2021) *Monmouthshire Housing Association Preliminary Ecology Appraisal*. Report Ref: E2093401/DOC 01, Issue 3 Dated: August 2021

Welsh Assembly Government (2021) Planning Policy Wales Edition 11. February 2021.

Welsh Assembly Government (2009) Technical Advice Note 5: Nature Conservation and Planning.

APPENDIX I SITE BOUNDARY PLAN



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

RED LINE BOUNDARY

N

Rev	Description	By	CB	Date
B	Revised Red Line Boundary	JRL	DP	24/01/23
A	Revised Red Line Boundary	GG	DP	22/07/21

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	GG	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	MARCH-2020

RPS Drawing / Figure Number: JPW1602-001

Rev: B

rpsgroup.com

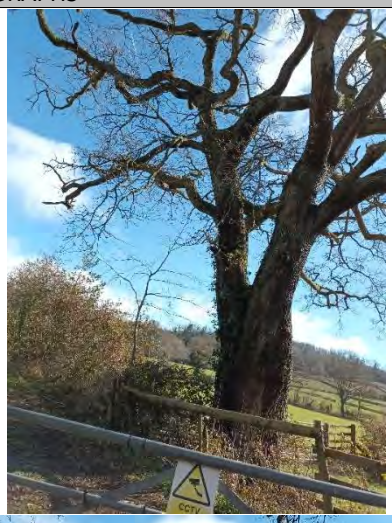
W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

[redacted]

APPENDIX III 2023 PHASE 1 HABITAT MAP & TARGET NOTES

Land west of Abergavenny,
Site visit notes. Friday 10th March 2023
Weather-Snow in morning then became sunny, 5-10°C

Species noted during the visit: Mistle thrush *Turdus viscivorus*, Pheasant *Phasianus colchicus* (F), Buzzard *Buteo buteo*, House Sparrow, Tree creeper *Certhia familiaris,* Red Kite *Milvus milvus,* Coal tit *Periparus ater,* Blue Tit *Cyanistes caeruleus*, Blackbird *Turdus merula*, Robin *Erithacus rubecula*, Wren *Troglodytes troglodytes*, Magpie *Pica pica*, Rook *Corvus frugilegus* and Carrion Crow *Corvus corone*
Mole hills, Badger sett (and footprints),

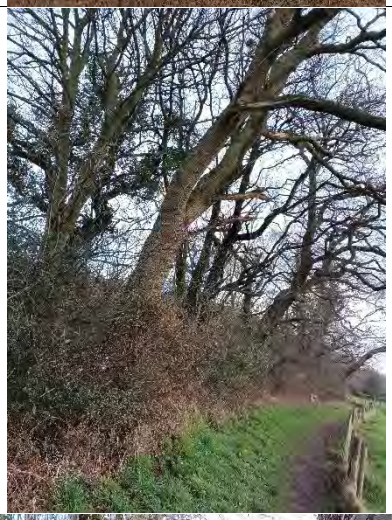
TN	PHOTOGRAPHS	DESCRIPTION
1		Mature Oak in northern corner of the adjacent field next to the entrance of Field 1. Several woodpecker holes noted. Large cavity present. **High bat potential**
2		Field 1. Access was not possible due to a locked gate. Single storey, corrugated metal stable with horse present during the survey-considered to have negligable bat potential. Improved grassland (grazed) with a dirt access track. Woodland to the north and west of the field.
3		Roadside outgrown hedge/broadleaved woodland along western side of Field 1. Semi mature/mature trees noted include Ash, Sycamore, Oak. Dense bramble undestorey. Laurel noted within the vegetation. Trees low potential given the presence of dense ivy. Likley to be used for foraging/commuting bats/nesting birds.

4		Field 2 Horse grazed improved grassland. Water collects in the southern part of the site and flows into a culvert located in Field 3. Hedgerow along the north eastern boundary is approximatley 1.5m high and is managed to a uniform height. Hedges/trees likley to be used for foraging/commuting bats and nesting birds.
5		Area of woodland has development along the western side of Fields 2/3. Tree species noted include Oak, Ash, Sycamore, Hazel, Willow, Field Mapel. Former hedge has become outgrown and self sown trees including Ash have established with a largely bramble understory,. Other species noted include Lords and Ladies, Male Fern. Hedges/trees likley to be used for foraging/commuting bats and nesting birds. Birds' nest noted in the trees.
6	 	Western boundary of Field 3. Wooden fence present. Bramble undertsory with several semi mature trees present. Species noted include Beech, Ash, Sycamore. Some Trees are likley to have been planted along the roadside verge given their uniform age and structure. Hedges/trees likley to be used for foraging/feeding/commuting bats and nesting birds. Several mature trees present. **Low bat potential-dense ivy covering preventing full inspection.**

7		Field 3 Dilapitated corrugated metal shed with Willow tree entangled into it. **Moderate bat potential**
8		Field 3 Culvet in north western corner of field. Drainage ditch flowing from east to west. Outgrown, species rich hedge along northern boundary between field 2 & 3. Hazel, Holly, Willow with bramble scrub understory.
9		Storm damaged Ash in hedge. Limb tear present. Regrowth has naturally occurred. **Low bat potential.**
10		Eastern hedge along Field 3. Managed to a height of approximatley 1.5m- Hazel, Hawthorn, Holly. Wet ditch runs length of the hedge into northern part of Field 3. 2 Mature Oaks within the hedge-Several rot holes and split branches present. **Low bat potential.**

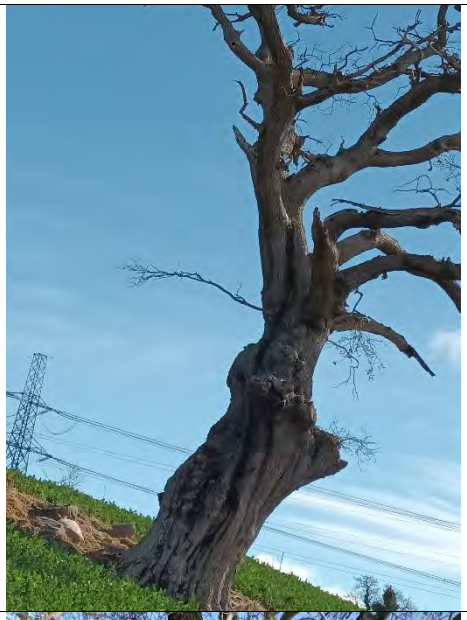
11		Outgrown, intact species rich hedge. Species noted include Ash, Hazel, Holly, Blackthorn with a bramble understorey. Self sown saplings also present.
12		Improved grassland-sheep grazed fields to the east of Fields 3 (outside red line boundary). Post and rail fence present with managed Hazel, blackthorn, Hawthorn hedge.
13		Wooded stream corridor running from the east to west. (Also a PROW). Several mature trees including Oak, Ash, Willow, Field maple, present with Hazel, Holly understory. Other species noted include Harts tongue fern, Male fern and Lords and Ladies. The stream during the survey was fast flowing in parts, shallow and did not contain any submergent vegetation during the survey, but did contain leaf litter.
14		Several mature Ash and Oaks trees within the woodland strip. Numeours cracks, splits limbs, limb tears present. Moderate/High bat potential.

15			Ash within woodland strip. Dense ivy present. Low bat potential.
16			Mature Oak within woodland strip. Limb tear near top of tree. Numeorus cracks/splits noted on upper limbs. Moderate bat potential.
17			Some trees were inaccessible during the survey, therefore not all have been fully assessed. Mature Ash on other side of wooded embankment. Ivy present. Limb tear noted towards the top. Moderate bat potetial.

18		Mature Oak. Numeorus limb tears/splits cracks present. Moderate bat potential.
19		PROW running alongside wooded stream on the left. Field 4 is present on the right side of the picture and it fenced with post and rail fencing.
20		PROW access from road. Non native Daffoils present.
21		Field 4 Arable field. Well managed hedge present on eastern and southern boundary. Boundary on the western side is consistent with the rest of the western boundaries. Out grown hedge with trees.

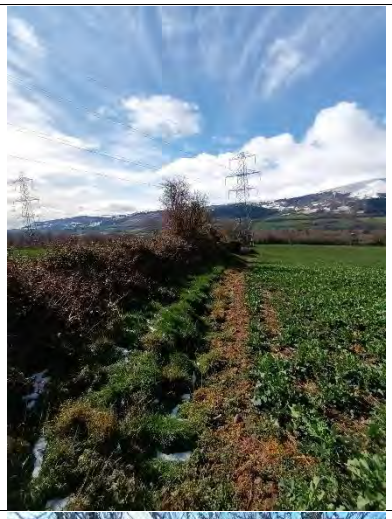
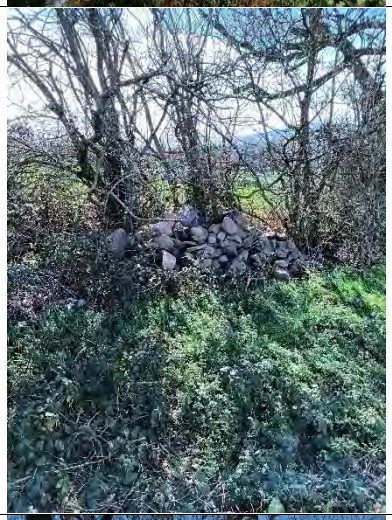
22		Field 5 Arable field. Intermittent hedge along northern/southern bounday. Western boundary consistent with the other roadside boundaries-scrub/outghrown hedge although the tree cover is less compared to the areas to the north and south. Mature Oak present in the centre of Field 5. Large cavity in lower section of the trunk. **High bat potential.** **Also potential bird nesting opportunities.**
23		Area of woodland between fields 5 & 6. Species noted in clude Ash and Beech. Section of western boundary has been managed in line with the overhead cables. No obvious potential roosting features noted. Negligable potential for roosting bats however likley otbe used for foraging/commuting.
24		Oak tree within hedgerow between fields 5&6. Large knot hole present, with cracked raised bark noted on the upper limbs. **Moderate bat potential.**

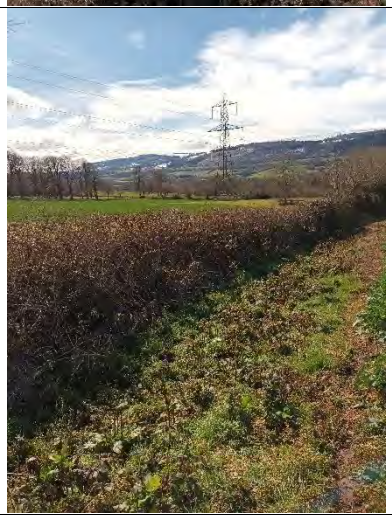
25	 	2 Mature Ash located next within the managed hedgerow between fields 6&7. Cavities/limb tears present approximatley 2.5m from ground. Dense ivy present. **Moderate bat potential**
26		Field 7- Arable field Intermittent hedge along northern boundary interspersed with semi mature/mature trees.

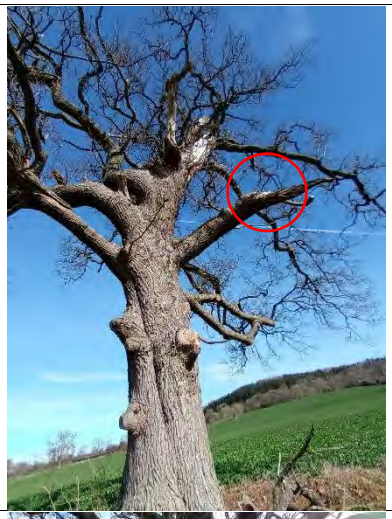
27		Dead tree located in field 7. Numerous rot holes/woodpecker holes, cracks/splits. High bat potential. Potential for nesting birds.
28		Mature Ash located within the adjacent field to the north of Field 7. Several cavities present/ Cracked bark and limb tear also noted. Moderate bat potential.
29		Eastern boundary of Field 7. Continuation of wooded stream running along the eastern boundary. Several mature trees present within the fenced woded stream, bramble scrub understorey present. Consistent with remainder of wooded stream.

30		2 Mature Ash present within the fencline of Field 7. (view looking north) **Negligable bat potential.**
31	 	3 dead/dying Oak and Ash present on field boundary with adjacent field to the south /east of field 7. Nuemrous rot holes/cavities, limb tears present. **High bat potential.**

		
32		Dead on south eastern boundary of Field 7. Dense ivy present, limb tear and cavity also noted. **High bat potential.**
33		Dead hollow Oak tree on south eastern boundary of Field 7 (outside fence line) Limb tears and dense ivy present. **High bat potential.**

34		Southern hedge of Field 7- consists largely of bramble scrub, itermittent along the length. Gorse present towards central section of the hedge near the pilon.
35		Stone rublle piles located on boundary between Fields 7 &8. Outgrown hedge present consitisting of Hazel, Ash and Holly.
36		Mature Ash present in hedge betwenen field 7&8. Some cavities present in upper limbs, but these appear to be shallow. **Low bat potential.**

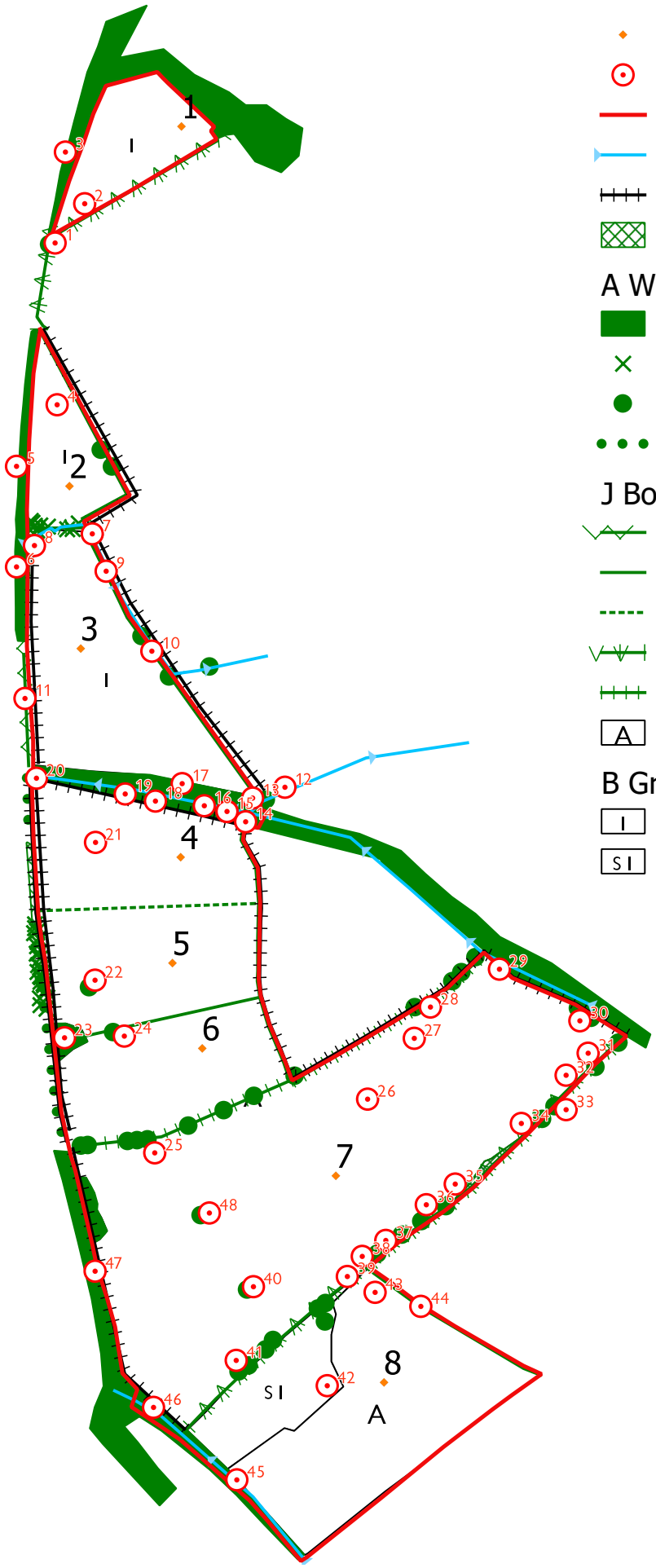
37			Dead tree with numeours cavities, cracks present. **Moderate potential.**
38			Mature Ash. Limb tears, cavities present. **Low bat potential.**
39			Bramble scrub hedge intermittent with trees between Fields 7&8.

40			Large Oak in centre of Field 7. Large limb tear on eastern facing side. **Low bat potential.**
41		 	2 Mature Oak in scrub on southern boundary. Large cavity present from base on one of Ash trees. Numeours limb tears and cavities present. **Moderate bat potential**

42		Field 8 Mainly arable with area of poor semi-improved grassland in northern corner of Field. Compact Rush noted, Selfheal, bush vetch noted. Outgrown hedge present on the northern side of Field 8. Hazel, Holl, Ash present with bramble scrub understory.
43	 	Dead tree present in the eastern part of Field 8. Dense bramble around base. Several cavities present and it appears to be hollow from the top. **High bat potential.** **Potential for nesting birds.**

44			Managed hawthorn hedge along eastern boundary of Field 8.
45			Wooded stream present on western boundary of Field 8. No submergent vegetation. Brambel understory with Mature Beech, Ash, Holly and Hazel present. Ground flora noted includes: Hogweed, Hemlock water dropwort, Dandelion, Male fern, Lords nad Ladies and dock sp.
46			Woodland strip on western boundary of Field 7. Species noted include Ash, Hazel, Silver birch, Holly with bramble understory. Relitively uniform height and size. Likley to have been planted along the roadside verge with self sown saplings also establishing.

47		Section of hedge/trees cut for overhead lines.
48		Mature Oak in middle of field 7. Large limb tear present. Cracked bark and crevices present. **Moderate bat potential.**



- Field no.
- Target Notes
- Site Boundary
- G2 Running Water
- J2.4 Fence
- A2.1 Dense/Continuous Scrub

A Woodland and Scrub

- A1.1.1 Broad-leaved Semi-natural Woodland
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- A3.1 Line of Broad-Leaved Trees

J Boundaries and Miscellaneous

- J2.1.1 Intact Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- [A] J1.1 Arable

B Grassland and Marsh

- [I] B4 Improved Grassland
- [SI] B6 Poor Semi-improved Grassland

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Coldbrook Estate

Land East of Abergavenny

2023 Phase 1 Habitat Survey

E23115301 KG MW 24 March 2023

soltysbrewster

4 Stangate House Stanwell Road Penarth Vale of Glamorgan CF64 2AA

Telephone:- 033 00 13 00 12

e-mail:- enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX IV LDP CANDIDATE SITE ASSESSMENT FORM

Local Development Plan
Ecological Site Assessments in Monmouthshire
2023

1 Introduction

To inform the allocation and deliverability of candidate sites through the LDP process in line with relevant policy and legislation, Monmouthshire County Council requires the submission of baseline ecological information. This methodology has been prepared in order to ensure that there is a consistent approach to this submission and that the quality of the information provided is adequate.

Site Appraisals shall be presented in a report and describe the existing ecological value of the proposed LDP sites, principally based on botanical survey but with consideration of other potential Protected or Priority species that may be present. Sites must be also assessed for their potential to qualify wholly or in part as Sites of Importance for Nature Conservation (SINCs) using the Guidelines for the Selection of Wildlife Sites in South Wales adapted for Monmouthshire (Available on the Monmouthshire County Council Website).

Following the site appraisal, an evaluation of status or potential impact on the biodiversity of the site must be made and classified as either: High, Medium or Low value. This status will be quality assured and checked by Monmouthshire County Council through the Candidate Sites Assessment Process prior to the Deposit Plan.

Information gathered from the Monmouthshire County Council Connectivity Assessment (available on the Monmouthshire County Council Website) will also need to be used to help inform the overall value of the proposed LDP Candidate Sites.

In addition to this, GIS (Geographical Information Systems) data in the format of shape files should be provided to provide visual representation of the ecological status of each site. (A guidance note on this requirement is available on the LDP webpages relating to the ecological site assessments of Candidate Sites on the MCC website.)

2 Requirements for LDP Candidate Site Assessment

Due to the large number of candidate sites proposed, Monmouthshire County Council requires a consistent approach to ecological data gathering and summarisation. All Appraisals must comply with the CIEEM Guidelines for Preliminary Ecological Appraisal and be undertaken and reviewed by CIEEM members only. All appraisals must include a summary sheet to be used by the LPA (template included at the end of this document). **The LDP should be based on robust evidence and our expectation is that this guidance is followed.**

It is strongly recommended that ecological information is submitted during the second call for candidate sites in late 2019.

2.1. Desk-Based Study

The desk based study shall be based on the following as a minimum:

- A 1km SEWBReC data search for Protected and Priority Species
- A 1km SEWBReC data search for existing designations including SACs, SPA, Ramsar site, SSSIs, Local Wildlife Sites, Sites of Importance for Nature Conservation. This must include 'reasons for designation' for LWS/SINCs.
- Use of the Ancient Woodland Inventory to identify woodland designations ASNW, PAWS etc.
- Identification of whether the site falls within the Juvenile Sustenance zone[1] for the Wye Valley and Forest of Dean Bat Sites SAC*
- Review of any previous walkover undertaken for the adopted LDP – information is available on the MCC LDP webpages
- Review of the Monmouthshire Ecological Connectivity Assessment[2] to assess the context of the candidate site in providing ecological connectivity- information is available on the MCC LDP webpages
- Appraisals will be expected to consider any relevant ecological records that have been previously generated by studies to inform planning undertaken on or near the sites.

[1] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost (SSSI)
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost (SSSI)
[2] Ecological Connectivity Assessment of Settlements in Monmouthshire Report, 2010

2.2. Field Assessments

The optimum period for the assessment of biodiversity and habitats is between the months of April -July. Sites to be surveyed according to the methodology detailed in the 'Handbook for Phase 1 habitat survey' . The following details and features must also be noted:

- Habitats present and features of nature conservation interest including Priority Habitat (Section 7 Habitat[3])
- Protected or Priority (Section 7) species - signs indicating presence and potential for the habitat to support such
- Site of Importance for Nature Conservation – assessment of the condition of the site with respect to its potential to qualify as a SINC
- Consideration of all hedgerows in the context of the Hedgerow Regulations 1997.
- Veteran trees - presence of over-mature trees
- Consideration of the value of the site in terms of habitat connectivity / ecosystem resilience using best available guidance
- Requirements for further ecological survey.

2.3. Expertise of consultants

The information will need to be prepared and reviewed by an appropriately experienced ecologist that is a member of the Chartered Institute of Ecology and Environmental Management.

2.4. Biodiversity Evaluation

Using the results of the desk-based survey and field assessments, an evaluation of status or impact of the biodiversity of the site shall be made and classified as either: High, Medium or Low value.

2.5. SINC Identification

Local Development Plan Candidate Sites must be assessed against the criteria in the '*Guidelines for the Selection of Wildlife Sites in South East Wales*' which have been adapted for Monmouthshire.

[3] Environment (Wales) Act 2016

3. Summary of Outputs

The following will be expected to submitted to the LPA during the second call for sites in Autumn 2019.

3.1 Preliminary Ecological Appraisal Report (PEAR)

A Preliminary Ecological Appraisal Report (PEAR) in accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal / Guidelines for ecological report writing.

3.2 Site summary form

A Site Summary Form shall be completed for each Candidate Site based on both field survey and desk-based assessments. A blank Site Detail Form and accompanying explanatory notes are provided in Annexes 1 & 2.

3.3 Site Values

For all sites, the **overall value** for biodiversity will need to be defined (see evaluation criteria below). Monmouthshire County Council may adjust this value depending on further ecological survey and evidence prior to the Deposit Plan.

3.4 SINC Assessment

Candidate sites/parts of sites must be considered for the potential for them to be of SINC quality. If the site, or part of the site meets the SINC criteria, please contact the LPA Biodiversity and Ecology team to discuss how data shall be presented. Designation will be thereafter undertaken by the SINC expert panel[4].

3.5 GIS information

The ecological status of the site will need to be digitised using GIS (Geographical Information Systems) in the format of shape files. A guidance note and template GIS shape file will be available on the Monmouthshire LDP website on the LDP page relating to the ecological site assessments of Candidate Sites. This shall include the format that digitisation will need to take.

[4] SINC Expert Panel includes Monmouthshire County Council, Gwent Wildlife Trust, Natural Resources Wales and Monmouthshire Meadows Group.

4. Evaluation Criteria

Sites must be evaluated using the following criteria drawn together using the methodology for the adopted Local Development Plan, Ratcliffe Criteria[5] and Local Wildlife Site guidelines[6]. The evaluation will be checked and quality assured by Monmouthshire County Council. **Deliberate underestimation of site value could jeopardise the sites inclusion in the deposit plan.**

HIGH (Red)

- Candidate Site includes land designated as SAC/SPA/Ramsar/SSSI
- Site within the Juvenile Sustenance Zone[7] of a Wye Valley Forest of Dean Bat Sites SAC Maternity roost SSSI
- Site wholly designated as Local Wildlife Site/SINC/ASNW
- Site identified as Site of Importance for Nature Conservation (SINC) quality during field assessment
- Site is in the majority (>50%) composed of Priority Habitat(s) (Section 7) Environment (Wales) Act 2016
- Site of existing value for connecting semi-natural habitats in the landscape which is considered to be critical in the context of a protected species or protected site
- Protected species recorded on site to an extent that development will not be possible

MEDIUM (Orange)

- Site close / adjacent to a SAC/SPA/Ramsar/SSSI/LWS/SINC/ASNW
- Site habitat(s) close to SINC quality but threshold for designation not reached
- Part of the site includes habitats that meet LWS / SINC threshold
- An already designated LWS/SINC present within a candidate site of overall lower biodiversity value
- Presence of Priority Habitat (Section 7) within the candidate site (except hedgerow)

[5] Ratcliffe, 1977
[6] South Wales Wildlife Sites Partnership, 2004 (as amended)
[7] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost (SSSI)
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost (SSSI)

- ‘Important’ hedgerow/s present
- Veteran / over mature tree(s) present
- Site of existing value for connecting semi-natural habitats in the landscape as identified in the ecological connectivity assessment and/or during field surveys.
- Protected species recorded / reasonable likely to be found on site but unlikely to prevent development if appropriate mitigation and compensation provided
- Site within the Juvenile Sustenance Zone[8] of a Horseshoe Maternity roost (not designated).

LOW (Green)

- Site not near any protected sites SAC/SPA/Ramsar/SSSI/LWS/ANSW
- Site assessed as not of SINC quality
- Limited or no features of biodiversity interest
- No priority habitats on site (with the exception of hedgerows)
- Site of very limited value for connecting semi-natural habitats in the landscape
- No protected species on or near site

[8] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost

Annex 1

Reference No: CS/0125

Site General Information	
Name: Land East of Abergavenny	Grid Reference: SO3079 1348
Current land use & management: Farm/Cropland	Size: 31Ha
Proposed use: Mixed Use Development	Form Completed by: [redacted]
Overall Site Evaluation: **MEDIUM**	

Site Summary Table

Statutory Designated Site(s)	**adj**	Section 7 Habitat(s)	**part**
SAC Juvenile sustenance zone	**no**	Protected Species	**yes**
Non Statutory Designated Site(s)	**adj**	Section 7 Species	**yes**
SINC Recommendation	**no**	Ecological Connectivity	**conn**
SEWBReC unique data code:			

Statutory Designated Sites

Is the site within or adjacent to an International or European Designated Site? (Special Protection Area, Ramsar Site or Special Area of Conservation) *(Underline the relevant designation)*

Whole of site	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
Within 1km buffer	
No	

Is the site within or adjacent to a Nationally Designated Site? (National Nature Reserve or Site of Special Scientific Interest) *(Underline the relevant designation)*

Within	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
No	

Juvenile sustenance zones - Is any part of the site within 1km of a greater horseshoe bat roost SSSI or within 600m of a lesser horseshoe bat roost SSSI?

Greater Horseshoe	
Lesser Horseshoe	
Distance from roost (m)	
No	✓

Non Statutory Designated Sites

Is the site within or adjacent to a pre-designated Locally Designated Site? (Local Wildlife Site / Site of Importance for Nature Conservation or Ancient Semi Natural Woodland)

Within	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
No	

List All Relevant Statutory and Non Statutory Designated Sites identified by the desktop study:

River Usk SAC & SSSI

River Gavenny SINC

SINC Recommendation

Is the whole site or part of the site of SINC (LWS) quality? *(underline whole or part as appropriate)*

Yes		Whole		Part	

Qualifying criteria	

Borderline	
No	✓

Has the Monmouthshire County Council Biodiversity & Ecology Team been contacted to discuss what further information may be required?

Yes:		No:	✓

Date:	

Priority Habitats and Important Features

Phase 1 Habitat	Wales Priority Habitat (Section 7)	% of whole site
J2.1.1 Intact Species-rich Hedgerow	Hedgerows	<1%
J2.1.2 Intact Species-poor Hedgerow	Hedgerows	<2%
J2.2.1 Defunct Species-poor Hedgerow	Hedgerows	<1%
J2.3.1 Species-rich Hedgerow with trees	Hedgerows	<1%
J2.3.2 Species-poor Hedgerow with trees	Hedgerows	<1%
G2 Running Water	Rivers, Streams, Ditches	<1%

Are there any **veteran trees or over-mature trees** on site?

Yes ✓ No ☐

If 'Yes' how many and what species?

At least 15no. veteran Oak and Ash around the site boundary.
Wooded stream contains at least 15 mature Ash, Oak.

Does the site have any **hedgerows**?

Species-rich (high) potential Hedgerow Regs Quality	✓	Length (m) **116**
Species-poor (medium) Has some potential	✓	Length (m) **2224**
Species-poor (low)	✓	Length (m)

Single species dominant AND Gappy		**479**
No		

Does the site have any **water features** present?

Ponds	
Streams	✓
Ditches	✓
Other:	
No	

Ecological Connectivity

Adjacent Land Uses & Habitats

A465 corridor
Ysgyryd Fach/Skirrid Fach/Woodland at Coldbrook Park
Arable field and farmland

Does the site have any ecological connectivity value to either adjacent habitat or the wider landscape?

Critical connectivity:		Existing Connectivity	✓	No connectivity:	
		Connectivity Opportunity:	✓		

Protected Species

Have protected species been recorded at the site / reasonably likely to be present at site?

Confirmed ✓ Reasonably likely ☐ No and unlikely to be present ☐

List Species: SEWBReC record	Evidence of presence on site (seen directly or field signs)	Potential to be present on site (habitat and location mean that it is likely)
[redacted]	[redacted]	[redacted]
Great Crested Newt 2no. records within 600m of the candidate site (dated 2007). A further 7no. records within 2km of the site.	Two off-site ponds within 250m of the candidate site. (Coldbrook Park) Sub-optimal terrestrial habitat identified at the candidate site (hedgerows, woodland, poor semi improved grassland and arable field margins)	**Low**
Bats 172no. records of foraging and commuting bats within 2km of the candidate site. A Single Soprano pipistrelle record was retuned from within the site boundary. Lesser horsehose bat, Nathusius pipistrelle, serotine, noctule, Daubenton's and other myotis bats recorded in wider area. Roosts for common/soprano pipistrelle, natterer's bat, whiskered bat and LHS within 1km of the site.	Linear habitat features at the site (hedgerows, woodland corridor and edge and stream) considered likely to support a number of foraging and commuting bat species. 9no. trees with high bat roost potential, 12no. trees with moderate and at least 10 trees with low potential (those accessible/visible during the survey)	**High**
Hazel Dormouse No SEWBReC records within 2km.	Extensive hedgerow network and woodland corridors considered suitable to support dormouse;	**Low**

	structurally suitable. Species-poor, defunct hedgerows of lower suitability.	
Reptiles 5. slow-worm records within 2km search radius, nearest located within 500m of the northern site boundary.	Majority of habitats (i.e. improved grassland and arable field) generally considered unsuitable. However, the candidate site contains an area of poor SI grassland in the southern part and the arable field margins are currently not managed and contain stone/rubble, potentially providing suitable habitat although these feature relatively isolated in agricultural/arable landscape. .	**Low**
White-Clawed Crayfish No SEWBReC records within 2km. River Gavenny SINC designation description references presence of white-clawed crayfish.	Streams at site are narrow, slow-flowing and generally have a shallow water depth (<20cm). Unlikely to support a long-term crayfish population.	**Negligible**
Otter & Water Vole Otter sighting over 500m west of the candidate site at the River Gavenny and River Usk. No SEWBReC records for water vole within 2km.	Streams at site are narrow, very shallow and lacking any bankside vegetation suitable for otter or water vole. Unlikely to contain sufficient prey resources for otter.	**Negligible**
Birds Red Kite, Barn Owl, Peregrine, Redwing, Fieldfare, Common Crossbill Brambling, Goshawk, Hobby and Golden Oriole recorded within 2km search radius.	Candidate site contains a number of mature trees with cavities suitable for nesting barn owl.	**Low**

Priority Species

Are there records for Priority (Section 7) Species (not included above)?

Yes ☑ Potential ☐ No ☐

List Species: SEWBReC record	Evidence of presence on site (seen directly or field signs)	Potential to be present on site (habitat and location mean that it is likely)
Birds Cuckoo, Linnet, Spotted Flycatcher, Skylark, Curlew, Tree Pipit, Kestrel, Wood Warbler, Marsh Tit, Hawfinch, Yellowhammer, Yellow Wagtail, Willow Tit, Lesser Redpoll, House Sparrow, Dunnock, Song Thrush and Nightjar recorded within 2km of the site.	Number of bird nests noted in tree canopies during the survey. House sparrow observed during the phase 1 survey. Open areas of improved grassland and arable fields considered suitable to support ground-nesting birds (e.g. Skylark).	**Confirmed**
Mammals Records of hedgehog, polecat, stoat and weasel within 2km search radius. Single Weasel record from within the site boundary.	Habitats at the candidate site likely to support foraging small mammals in particular the field margins, hedgerows and woodland.	**High**

Conclusions

What additional ecological surveys/assessments will be required?

To determine if the site could be allocated for the purpose identified	Prior to the submission of planning application to influence site design etc. • Great Crested Newt (eDNA) • Bats (activity transects, automated monitoring and emergence/re-entry, Physical check of PRF's) • Hazel Dormouse • Barn Owl • Reptiles • Badger

Summary of potential biodiversity constraints

[redacted]

Hedgerows, woodland and scattered trees with potential to support foraging and commuting bats and nesting birds.

9no. trees with high potential to support roosting bats, 12no. with moderate and 10no. with low potential.

Open areas of improved grassland and arable field with potential to support ground-nesting birds.

Scattered trees at the site of some suitability to support nesting Barn Owl.

Low potential to support GCN. 2no. off-site ponds within 250m of the candidate site. Sub-optimal terrestrial habitats at the candidate site.

Low potential to support common reptiles. Areas of poor semi-improved grassland/arable field margins provide suitable habitats.

Extensive hedgerow network and woodland parcels considered suitable to support hazel dormouse, species-poor defunct hedgerows of low suitability.

Presence of veteran and over-mature trees. **Presence of priority habitats; including an extensive hedgerow network and streams.** **Streams at the candidate site have hydrological links to River Gavenny SINC.**

Recommended avoidance / mitigation / compensation measures

Retain and enhance priority habitats (hedgerow network and streams) where possible. Retain trees with potential to support roosting bats where possible. Retain veteran/mature trees Maintain dark corridors along retained hedgerow network and other linear habitat features On-site or off-site habitat management for ground-nesting birds

Enhancements that could be delivered through development including ecological connectivity opportunities

New native tree and shrub planting to strengthen/enhance defunct hedgerow boundaries. Additional buffer planting to protect retained hedge network Provision of bird and bat boxes into new residential units Incorporating a small gap at bottom of garden and boundary fencing to ensure connectivity for Hedgehog and small mammals Adoption of green-infrastructure management strategy for the site Enhancements for invertebrates e.g. bee bricks, wildflower planting.

Annex 2: Notes to Accompany Site Detail Form

Monmouthshire County Council reserve the right to amend any Site Detail Form upon detailed consideration of the site and quality assurance of the information submitted.

Site General Information

Site reference number, name, National Grid Reference, size (ha) and proposed use. 'Current Use & current management' describes the use of the site at the time of surveying and how it appears to be managed.

Overall Site Evaluation

To be completed based upon Section 4 of this guidance. One of the evaluation categories can be chosen i.e. **High** / **Medium** / **Low**. This evaluation could be subject to change upon consideration of the site and quality assurance by Monmouthshire County Council.

Summary Table

The summary table gives a quick reference guide to the ecological constraints of the site.
Protected sites are considered on page ii of the form. The summary needs to show an existing protected site (**yes**), adjacent sites within 250m (**adj**) adjacent sites within 500m (**adj**) and no protected sites within 500m (**no**). Note that development can potentially affect protected sites that are further than 500m away.

The potential for consideration of horseshoe bat SAC juvenile sustenance zones is considered on page ii of the form. The summary should address whether the site falls within the site buffers (**yes**) or not (**no**).

Non-statutory sites are considered on page iii of the form. The summary needs to show an existing site (**yes**), adjacent sites within 250m (**adj**) adjacent sites within 500m (**adj**) and no protected sites within 500m (**no**).

SINC recommendation is shown on page iv of the form. The table indicates whether the whole site is recommended for SINC designation (**yes**), part of the site is recommended for SINC designation (**part**), the site may meet the criteria following further survey and examination (borderline site – **bord**), or the site is not recommended for SINC designation (**no**).

Wales Priority Habitat (Section 7) is considered according to the table on page v of the form. This shows whether these habitats cover over 50% of a site (**yes**), less than 50% of a site (**part**) or are not present (**no**).

Projected and Priority species are considered on page vii of the form. Presence (**yes**), reasonable likelihood of presence / possible presence (**poss**) and likely absence (**no**) of Protected and Priority species are indicated in the summary table.

Ecological connectivity is considered on page vi of the form. The summary table indicates the importance of that connectivity from critical (**crit**), some (**conn**), to no connectivity (**no**).

Statutory Designated Sites

The information regarding designated sites shall be obtained via SEWBReC. Some interpretation of that data will need to be undertaken to establish the proximity of sites to Juvenile Sustenance Zones for horseshoe bats associated with the Wye Valley and Forest of Dean Bat Sites SAC (maternity roost SSSIs). The juvenile sustenance zone for Greater

Non Statutory Designated Sites

The information regarding SINCs/LWS sites shall be obtained via SEWBReC (site name and reason for designation). Detailed site designation forms (recommended for sites within 250m of the Candidate Site) will be available from Monmouthshire County Council (SINCs) and Gwent Wildlife Trust (LWS).

Designated ancient woodland is defined as ancient semi-natural woodland (ASNW) – areas that have been wooded since at least 1600. ASNW is listed on Ancient Woodland Inventory 2011 and available on the Lle website. However, in Monmouthshire, a large number of ASNW are designated as SINC and shall therefore be generated during the above data search.

SINC Recommendation

This section indicates whether the whole site or part of the site meets the criteria for SINC designation in Guidelines for the Selection of Wildlife Sites in South Wales adapted for Monmouthshire. The criterion under which the site qualifies shall be noted. The LPA Biodiversity & Ecology Officers should be contacted for relevant templates and to discuss the value of the site / part of the site.

Priority Habitats and Important Features

Habitats as defined by the Phase 1 survey guidelines and Wales Priority Habitat (defined as those listed as Section 7 Habitats of Principal Importance for Conserving Biological Diversity in Wales

under the Environment (Wales) Act 2016) shall be listed in the table. A % value for the habitat types shall be listed.

This information will also be demonstrated on the GIS shape files submitted to the LPA (see separate guidance).

Guidance for assessment of the importance of hedgerows and veteran/over mature trees is included in Annex 3 & 4.

Ecological Connectivity

Sites shall be assessed for existing value for connecting semi-natural habitats in the landscape using Ecological Connectivity Assessment and/or during field surveys. Both habitats and species need to be considered. Opportunities for delivery of habitat connectivity to be listed under the Enhancements section on page viii of the form.

Protected species

These tables indicate the presence or potential presence of protected species, based on SEWBReC records, the desk survey and field survey results. Species with protection or designation at several levels are listed under their highest degree of protection only.

Field signs and sightings are those recorded during the Phase 1 habitat survey.

Potential presence is based on the habitats on and adjacent to the site, the ecology of the species, and knowledge of the species distribution.

Protected Species are defined as those species listed on Schedules 2 and 4 of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) or any post Brexit equivalent legislation AND Species protected under UK legislation i.e. those species listed under Schedules 5 and 8 of the Wildlife & Countryside Act 1981 (as amended) or the Protection of Badgers Act, 1992. Species protected from sale only are excluded.

Wales Priority Species are defined as those listed as species of Principal Importance for Conserving Biological Diversity in Wales under Section 7 of the Environment (Wales) Act 2016

Conclusions

Additional surveys and assessments are listed. These are based on the potential presence of protected species as detailed on page vii of the form. Any surveys that may be necessary prior to the allocation of the site should be identified e.g. horseshoe bat surveys

Potential constraints are summarised, based on the findings of the desk-based assessment and field survey, as recorded in previous sections.

Recommendations for mitigation and enhancement are suggested. These are intended as an indication only, as further survey will be needed to inform mitigation, and the design and purpose of the development will determine ecological impacts and influence mitigation and enhancement possibilities. Reference can be made to the Ecological Connectivity Assessment where appropriate.

Annex 3: Hedgerow Classification

HIGH: Species-rich containing at least five native woody species in a 30 metre sample. Consider features such as banks, ditches, standing trees, ground flora associated and connecting hedges/woodland areas.

Four woody species are recorded and other features are considered important. This would include, potential dormouse habitat.

MEDIUM: Less than five native woody species in a 30 metre stretch, without other features present.

Less than four native woody species, with other features present

LOW: Less than four native woody species, without other features present. Gappy hedges, newly planted.

Annex 4: Veteran and Over Mature Tree Classification

HIGH: Veteran trees >3.7m circumference, 1.3m from base (to include native and non-native species)

Large over-mature trees >2m circumference, or estimated to be over 200 years old, which exhibit characteristics such as dead wood, rot hollows and bracket fungi. To include native and non-native species.

Appendix 8

Compliance with six DCFW Placemaking Principles



Development Compliance with the six DCFW Placemaking Principles
November 2024

Land East of Abergavenny

Roberts Limbrick

Certified B Corporation

03333 405500
mail@robertslimbrick.com
www.robertslimbrick.com

Registered in England. Registration No: 06658029

Coldbrook Estate

Author:	XX
Project:	11599
Revision:	V2
Issued:	29 November 2024

©2024 Roberts Limbrick Ltd

This report has been prepared by Roberts Limbrick Architects.

The contents of this document must not be copied or reproduced in whole or in part without written consent of Roberts Limbrick Architects.

Roberts Limbrick

Contents

Contents 2

What are the principles of the DCFW Placemaking Charter? 4

Draft Development Masterplan 5

Principle 1: People and Community 6

Principle 2: Location 8

Principle 3: Movement 10

Principle 4: Mix of Uses 13

Land Budget 14

Principle 5: Public Realm 16

Principle 6: Identity 18

What is the Placemaking Charter?

The development East of Abergavenny is focused around the Design Commission for Wales' (DCFW) Placemaking Charter.

There is a strong commitment to creating sustainable, inclusive, and people-focused places that enhance community wellbeing and reflect local identity as demonstrated in the masterplan.

1 Roberts Limbrick have been instructed on behalf of 2 Coldbrook Estate to develop a masterplan and strategy for land East of Abergavenny. The Placemaking Charter has been used to influence the design of this strategic masterplan from the early concept stages.

The Design Commission for Wales' Placemaking Charter is fundamentally a set of principles aimed at promoting high-quality, sustainable, and inclusive developments across Wales.

Key Principles of the Placemaking Charter: People and Community:

- To focus on designing places that are inclusive, accessible, and responsive to the needs of the community, fostering a sense of community cohesion.
- Encouraging active travel (walking, cycling, public transport) and promoting these modes over cars. It is also about ensuring places area easy to get around and navigable.
- Creating attractive, functional, and well-maintained public spaces that enhance social interaction and community engagement.
- Supporting mixed uses of the land that can include houses, commercial, jobs, services, and leisure spaces.
- Honing in on the local character of the place. Promoting its heritage and distinctiveness creating an of-the-place development.
- Creating an environmentally conscious development that promotes long term climate resilience, and sustainability.

1 x 2 Coldbrook Estate



Placemaking Guide 2020 (source: DCFW) | The 6 placemaking principles (source: DCFW)

What are the principles of the DCFW Placemaking Charter?

The charter is broken down into the following six principles which focus on creating a fully cohesive development.

It is our aim through the design of this masterplan to adhere and follow these principles to create a well-designed development that prioritises the needs of people, promotes walking, cycling and sustainable movement, enhances community wellbeing, and contributes to environmental, social, and economic resilience of Abergavenny.

The Placemaking Charter is designed to guide stakeholders, developers, architects, planners, local authorities, and communities, to collaborate on delivering better places.

This initiative aligns with Wales' Well-being of Future Generations Act 2015, reinforcing sustainable development and ensuring the creation of healthy, connected, and thriving communities for current and future generations.

The 6 placemaking principles (source: DCFW)

1 People and Community

- The local community are involved in the development of proposals. The needs, aspirations, health and well-being of all people are considered at the outset.
- Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

2 Location

- Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected.
- The location of housing, employment, leisure and other facilities are planned to help reduce the need to travel.

3 Movement

- Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles.
- Well designed and safe active travel routes connect to the wider active travel and public transport network, and public transport stations and stops are positively integrated.

4 Mix of Uses

- Places have a range of purposes which provide opportunities for community development, local business growth and access to jobs, services and facilities via walking, cycling or public transport.
- Development density and a mix of uses and tenures helps to support a diverse community and vibrant public realm.

5 Public Realm

- Streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity.
- They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated.
- They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.

6 Identity

- The positive, distinctive qualities of existing places are valued and respected.
- The unique features and opportunities of a location, including heritage, culture, language, built and natural physical attributes, are identified and responded to.

Draft Development Masterplan



Framework Masterplan (source: RL)

1. Attenuation ponds at lowest point on the site - creates attractive green edge to the main road.
2. Development blocks work with the contours of the site to help minimise engineering and retaining elements.
3. Site Access from A465.
4. Non ticketed access to Abergavenny town centre.
5. Ticketed access to train station for residents and Park & Ride.
6. New local centre, with commercial and community uses creates entrance space and strong frontage along A465.
7. Pedestrian and cycle routes link into the wider area via existing and established connections.
8. Existing PROWs retained and incorporated into the scheme.
9. Development does not extend beyond the 110m contour line to minimise visual impact.
10. Existing trees and hedgerows wherever possible.
11. Play spaces integrated into swathes of the land to create a green focused development.

❶ Principle 1: People and Community

The local community are involved in the development of proposals. The needs, aspirations, health and well-being of all people are considered at the outset.

Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

A sustainable community building will centre at the gateway to the development. This will provide facilities to meet local needs and will also promote active travel.

Uses could include a convenience store, co-working hub, community wellbeing spaces, cycle hub, bike parking an parcel lockers to reduce delivery traffic.

The hub could display local information, bus timetables and walking routes which would introducing new residents to sustainable travel options.

Community and commercial uses would encompass approximately 58,125sqft of space and would provide a strong and robust frontage onto the A465 announcing the development.

Community cohesion and integration will also be fostered from the outset. The development will be designed to align with Abergavenny's heritage, local vernacular and need for new sustainable and robust homes.

There is opportunity to host interactive sessions where local residents can share their ideas, concerns, and aspirations, ensuring their voices directly influencing the development's design.

Through the large volume of community uses planned, spaces will incorporate areas that encourage interaction and integration. There can be shared gardens, a range of playgrounds LAPs and LEAPs, and the multipurpose community center for events, learning, and support services.

The local community need for affordable housing will also be prioritised as part of these proposals. There will be effort made to include diverse housing options, ensuring affordability and accessibility for all income levels, fostering a balanced and inclusive community.

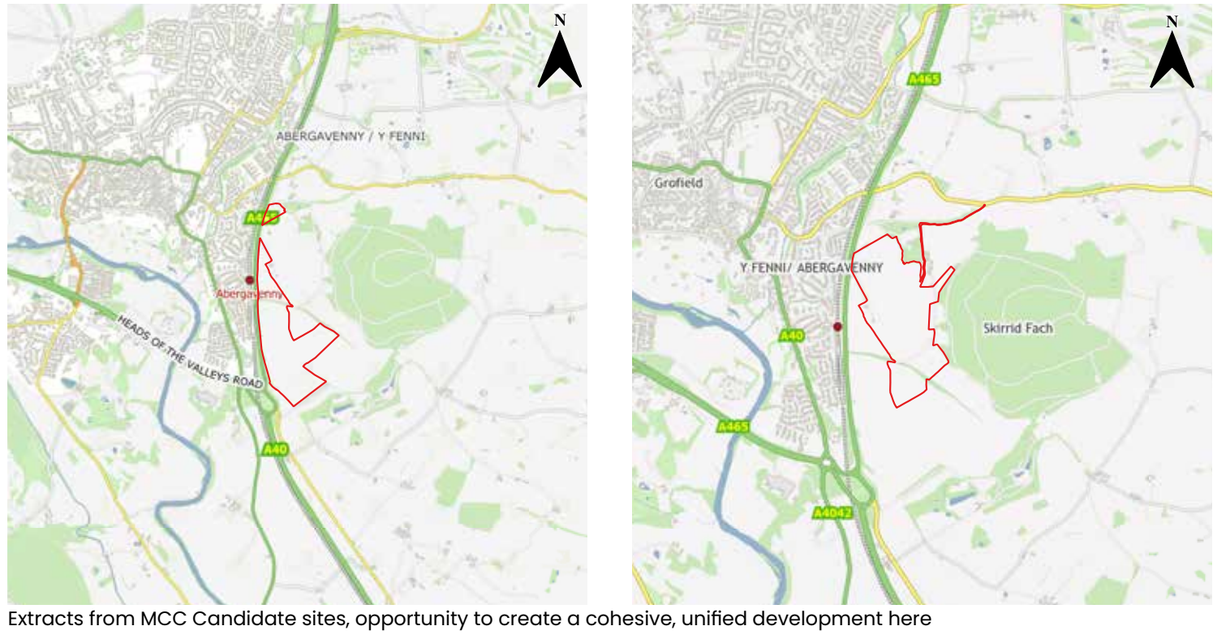


Very strong frontage onto integrated drainage swales and planting

This candidate site was the inspiration of Monmouthshire County Council (MCC) They have already carried out a public consultation and worked through the various stages of the plan to date. This concept evolves the MCC allocation and uses the DCFW placemaking principles to create a strong and robust, of-the-place development.

Working together with land owners, this cohesive plan addresses the area and creates a unified development responding to natural landscape features and also the A465.

Coldbrook Estate are in ownership of land surrounding the red line here and as such there are a range of opportunities for off site mitigation measures should any be needed.



Extracts from MCC Candidate sites, opportunity to create a cohesive, unified development here



Community centred ground floor, wide range of uses


Community building with associated gardens


Mix of retail and residential frontage onto street


Attractive and safe walking routes


Play spaces incorporated throughout


Local identity symbolised through art

2 Principle 2: Location

Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected.

The location of housing, employment, leisure and other facilities are planned to help reduce the need to travel.

The development takes inspiration from the region and character of Abergavenny. There is no development north of the 110m contour line to protect sight lines and to create a development that is respectful to the wider town.

Abergavenny's connectivity makes it a vital gateway enhancing the town's accessibility and sustainability. The development East of Abergavenny will contribute positively to the station, promoting sustainable movement.

This development masterplan uses the land efficiently and focuses around a compact, appropriately dense design. This masterplan ensures the land is used efficiently while not detracting from creating a vibrant and walkable new neighbourhood in Abergavenny.

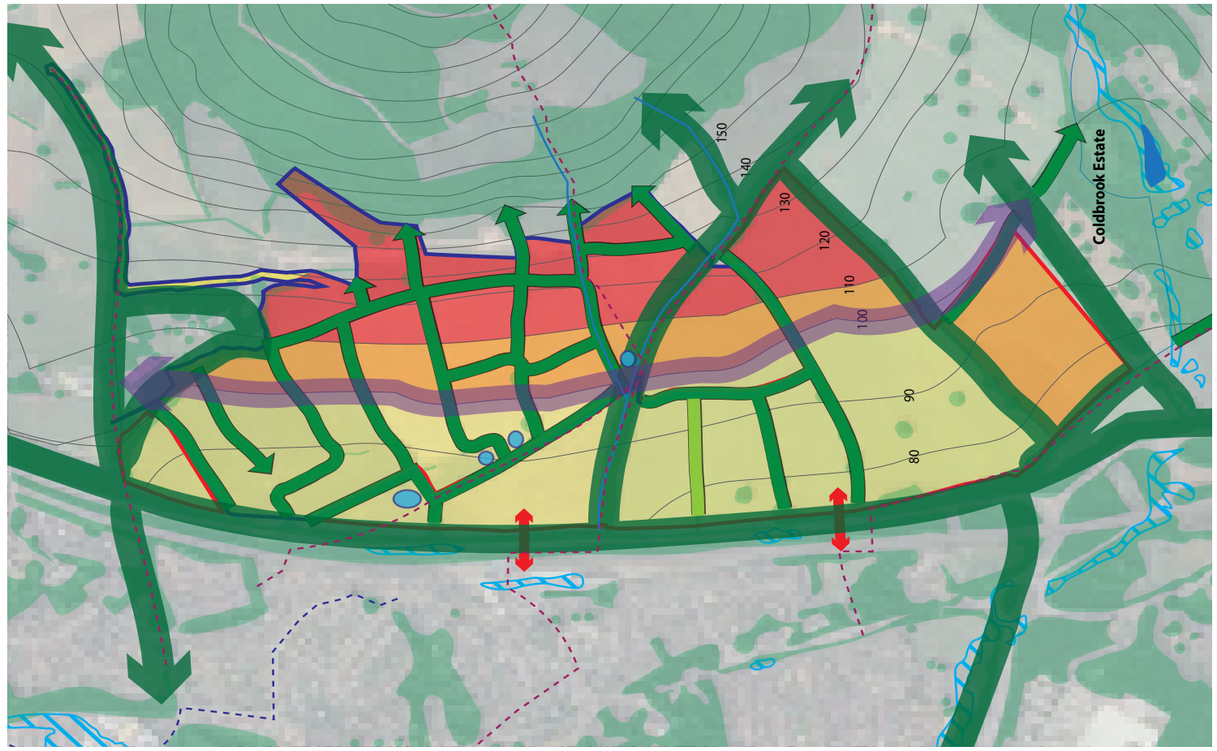
It is hoped this development will integrate with the existing communities, enhance local infrastructure and offer services to wider Abergavenny residents. The deisgn is targetted at achieving these.

Mixed-use spaces will be a key feature, combining residential, retail, and leisure facilities to make the best use of available land and foster active, multifunctional environments with mixed use buildings for example maximising space.

The development will be strategically located with great connectivity to the wider region through safe and direct walking, cycling, and public transport links.

Key facilities such as schools, healthcare, and employment centres will be easily accessible via active travel routes, ensuring that the new community is physically and socially integrated with its surroundings.

Housing, employment, leisure, and essential services will be co-located within the community and mixed use area of the development to minimise the need for residents to travel long distances for work or daily needs.



Green Infrastructure Strategy

Areas of relative high baseline visibility

Areas of relative low baseline visibility

Areas of relative moderate baseline visibility

110m contour line - No development above this contour. Proposed hedgerow and woodland buffer

A sustainable community focused mixed use hub within the development will provide amenities like shops and shared work spaces for example, reducing the need for off-site trips and supporting remote working.

This approach is aimed at ensuring the development is a natural continuation of Abergavenny and also fits into the wider region while strengthening connections with the existing communities.

Visual Landscape Appraisal:

A visual landscape appraisal was completed and this determined to be respectful and in keeping with the local area, the development would not exceed the 110m contour line.

This would screen the development from the surrounding area and settle it within the land at Abergavenny.

Important sight lines would remain and this development would not negatively impact key landmark features in the area.



Houses and development will respect the local area and take inspiration from and fit into the location



Mixed use building with retail on the ground floor



Mixed use and community uses on ground floor, apartments on upper floors to activate space



Robust frontage onto attenuation and the primary road, design is of the place and harmonious with Abergavenny



Local area respected



Community gathering spaces can be created

3 Principle 3: Movement

Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles.

Well designed and safe active travel routes connect to the wider active travel and public transport network, and public transport stations and stops are positively integrated.

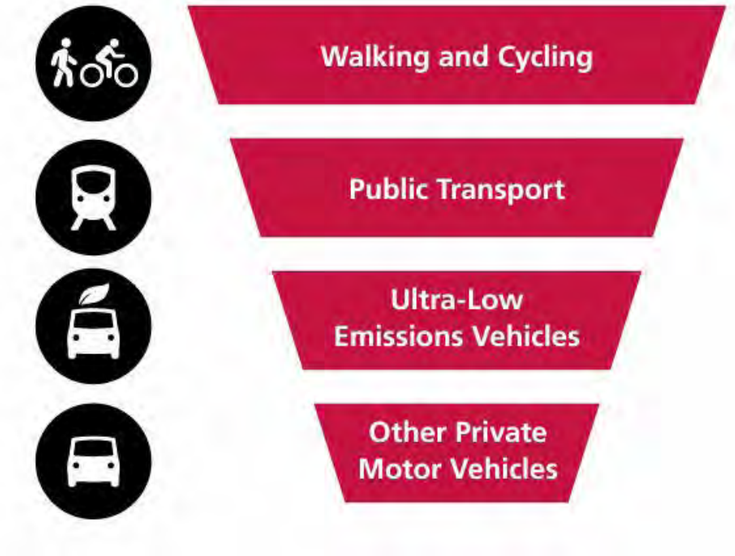
Within the development site, movement via bicycle and on foot will be prioritised over car journeys. All footways will be designed to standards. A well designed route hierarchy will also movement and provide a navigable street hierarchy.

Links will be created to existing Public Rights of Way (PROWs) throughout the site. All of the PROWs will be retained within the site and will be enhanced and incorporated into green corridors and along routes.

A new movement hierarchy will be created over the A465. Here, a radical new public space will be created turning the road into a street. This will facilitate, and promote movement over the main road towards the train station and the town core to the West.

Abergavenny train station provides regular connections to Cardiff, Newport, and Hereford, as well as direct links to Birmingham. With frequent services to Cardiff, the station is an important commuter link, facilitating easy access to Cardiff for both work and leisure. The station also offers routes towards Brecon Beacons and surrounding areas, making it popular with tourism.

The A465, is a major route running through Abergavenny and so there area number of bus services along here. Several bus routes operate along this corridor, linking Abergavenny with nearby towns such as Merthyr Tydfil, Brynmawr, and Aberdare, as well as connecting to Cardiff and other parts of South Wales. These services offer regular options for both commuters and residents. The bus routes along the A465 also support access to key facilities, including the town centre, local schools, and businesses, contributing to the region's sustainable transport network by reducing road congestion and promoting greener travel options.



This table highlights movement via Active Travel routes for different users.

This can be summarised that reasonable distances for active travel modes are:

Cycling - 5 Miles

Walking - 2 Miles

Cycling on an electric bike - 5 Miles

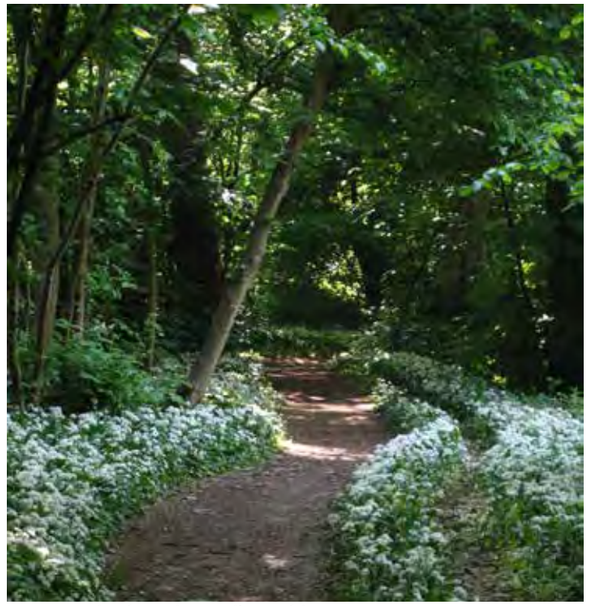
Mode	Less than 1 mile	Up to 2 miles	Up to 3 miles	Up to 4 miles	Up to 5 miles	Up to 7.5 miles	Up to 15 miles
	●	●	●	●	●	●	●
	●	●	●	●	●	●	●
e-	●	●	●	●	●	●	●

Colour	Average active user likelihood
●	Many users likely to travel this distance for utility journeys
●	Some users likely to travel this distance for utility journeys
●	Few or no users likely to travel this distance for utility journeys

Active Travel Act Guidance (source: Welsh Gov)



Natural loop routes created



Opportunity for ‘trim trails’ at fringes



Cycling and active movement

There is also a Park & Ride (P&R) facility integrated into the development at the access junction with the A465.

It is strategically located at the entrance to the site, ensuring it remains easily accessible while minimising disruption to residents within the development parcels.

This is located near to the A40 and A465 which create a distinctive connection to Abergavenny train station. This then links into the wider rail network. This positioning supports regional travel while reducing the reliance on private car journeys.

The P&R facility will hopefully contribute to green and sustainable movement. It will also encourage public transport use which will be promoted over private car travel. The P&R makes it convenient for residents and visitors to transition from their cars to the train which will also hopefully reduce road congestion.

By decreasing the number of individual car journeys (taking the train instead) the scheme significantly reduces greenhouse gas emissions and promotes links into the wider Active Travel (AT) network.

Specific pedestrian crossings along the A465 will connect the P&R to the station and onto Abergavenny to the east.

This also has a number of shared benefits, not just for residents of the new development. Residents can use the Park and Ride for commuting while visitors can also benefit from easy access to transport without burdening local roads or parking resources.

The whole development will include accessible pavements, clear signage, and seating areas that will ensure all abilities feel comfortable and safe navigating the area.



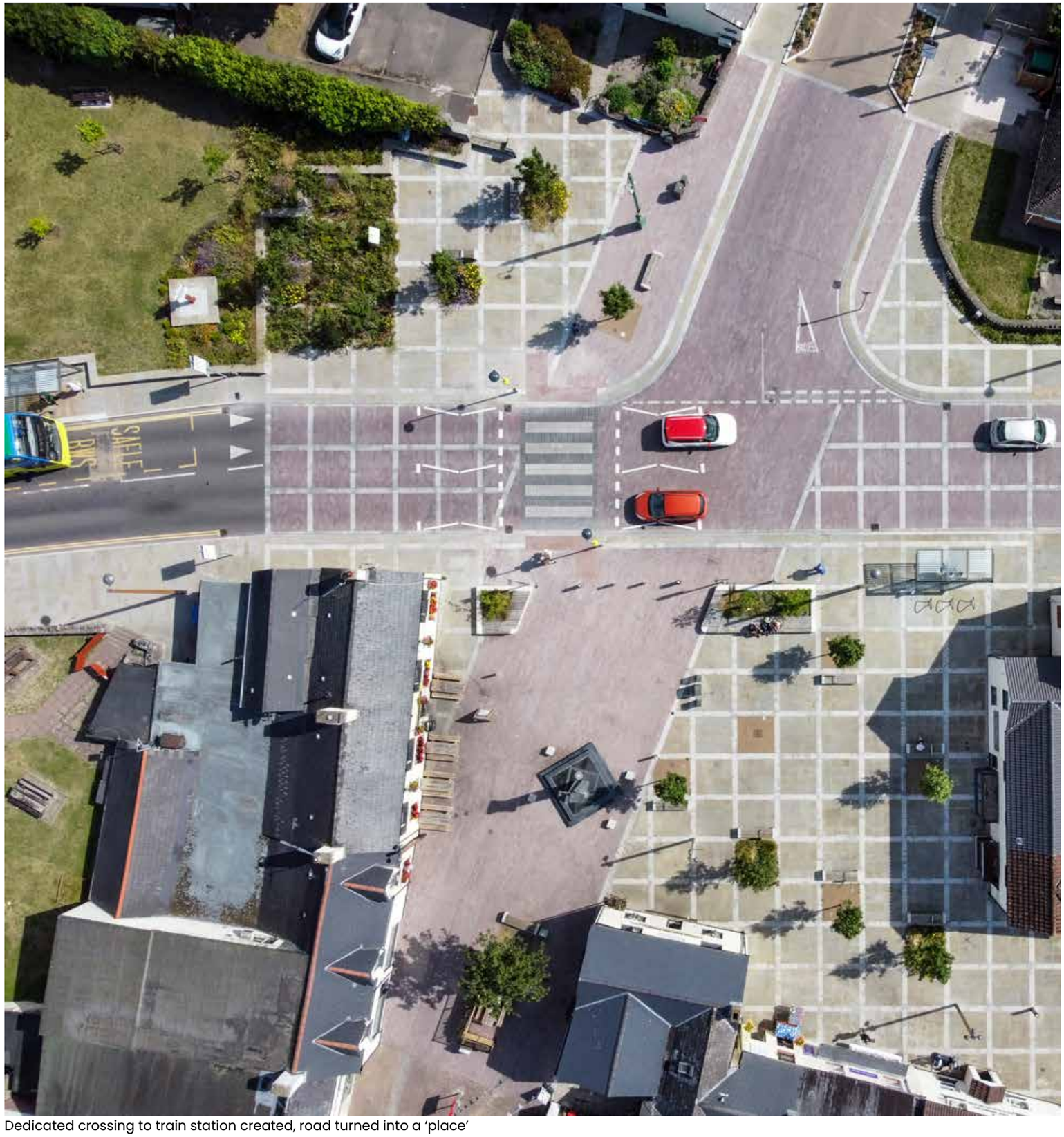
Integrated, and accessible paths through development



Opportunity to create an attractive street



Raised table traffic calming



Dedicated crossing to train station created, road turned into a ‘place’

4 Principle 4: Mix of Uses

To comply with this principle, the site not only features residential development, but also a range of other uses focused around creating a wholly functioning development for residents.

Some of these uses include mixed use work spaces, a park and ride hub, an integrated transport exchange, swathes

The land budget highlights the varied uses incorporated on the development site:

1. Residential Development
2. Potential Future Development
3. Community uses, community hub and interchange
4. Park & Ride
5. Green public open spaces
6. Commercial space

This varied land use allows the site to serve a number of functions and creates a walkable and livable place for residents.

Residential development land

Approximately 15.68ha of land has been earmarked for residential development. This would produce in the region of 500no units within the plan period. The residential land, while a fundamental element, is not the only type of allocation here.

Green spaces

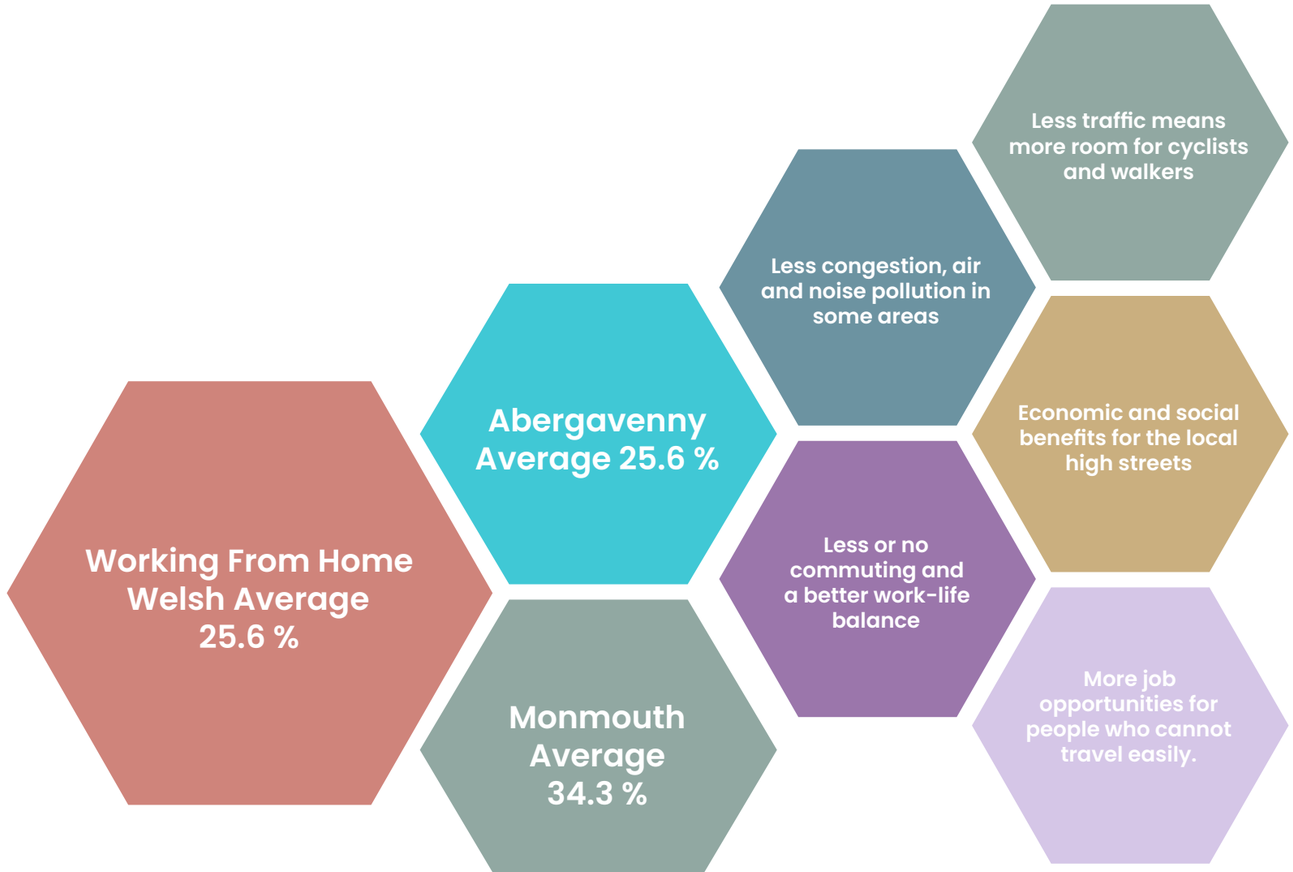
Within the land use plan and framework masterplan, there are swathes of the site earmarked for open spaces, play zones and natural green space to be enjoyed by all residents.

Almost 18ha of open space, green areas and play has been shown on the plan which creates a development with a green heart.

Local Business Hubs

Establishing opportunities for local entrepreneurs, including community spaces or shared workspaces for example will strengthen the local economy and create jobs within the community.

Park & Ride (see movement chapter)



Working from home statistics (source: 2021 census) | Benefits of working from home (source: WG remote working strategy)

Co-Working spaces

Working from home and working remotely has grown significantly in recent years. This not only reduces daily car usage but highlights the need for flexible spaces for those unable to work from home due to space or distractions.

To address this, a remote working hub within a sustainable community building could be incorporated into this site. This could offer rentable desks and private rooms for both new and existing residents, further minimizing car use in the area.

Not only would this foster a community within the development, but also offer flexible spaces for the wider residents of Abergavenny creating a cohesive sense of community with existing residents.

These interventions and vast mix of uses within the site will ensure the development meets the aspirations of the local community while fostering equality, inclusion, and a thriving sense of community well-being.

Land Budget



Land Use plan (source: RL)



Integrated public space, opportunity for spill out zones



Mix of retail, cafes, commercial, co working and community spaces



Local centre, village core created



Opportunity for seating, dwell time



Dedicated crossing, ‘place’ created at train station

5 Principle 5: Public Realm

Streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity. They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated.

They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.

Vast swathes of this development site are earmarked for public open spaces (POS) play spaces, (LEAP & LAP) as well as community spaces. These all work hard to create a robust, attractive and quality public realm not only for new residents, but for Abergavenny as a wider whole.

This development will be designed with health at the core. This development can enhance physical and mental well-being, such as promoting green spaces, active travel routes, accessibility and public realm facilities.

A community will also be fostered through the inclusion of these communal parks, walking trails, and natural areas that encourage active lifestyles, improve mental health, and provide shared spaces for residents to connect.

Public spaces will be designed to incorporate secure by deisgn principles. This will further limit antisocial behaviour etc. On this theme, streets and public spaces will be designed with clear boundaries using high-quality materials, landscaping, and appropriate lighting to create a welcoming and visually cohesive environment but also demarcate private and public spaces.

Public spaces will reflect the character of the location and the new public space created at the gateway between the train station will further set this development as a landmark site.

A new raised table here will transform the road into a ‘street’ The introduction of soft and hard landscaping (native plant species, enhancing biodiversity) will create a place.

It is hoped, this measure will slow down cars and emphasise the importance of pedestrian movement across the road.



Attenuation creating an attractive gateway to development



Community growing space



Community allotment



Integrated natural play



Green and green infrastructure combine



Corner turning unit creates attractive frontage

Green and blue infrastructure

Green measures such as tree-lined streets, community gardens, and biodiversity corridors will be integrated to enhance air quality, provide shade, and support local wildlife all the while contributing positively to the public realm within and surrounding the development.

Sustainable drainage systems (SuDS), including permeable paving, swales, and rain gardens, will be embedded into streets and public spaces to manage surface water, prevent flooding, and contribute to the area's visual appeal.

Play

Streets and public spaces will encourage social interaction through the inclusion of playgrounds, seating areas, and community hubs that cater to people of all ages and interests. Not only through formal play spaces but also informal, on the way play will be included.

This approach to public realm ensures the development is not only functional and sustainable but also creates a thriving, inclusive and attractive environment that meets the needs of residents.



Play throughout the development



Natural fringes to the development created through the public realm

6 Principle 6: Identity

The positive, distinctive qualities of existing places are valued and respected.

The unique features and opportunities of a location, including heritage, culture, language, built and natural physical attributes, are identified and responded to.



Natural identity represented through planting

This development complies with the identity principle within the Placemaking Charter. Specific attention to the local area, vernacular, historic significance and context of the place have informed the design of the masterplan at this stage.

This framework plan embraces and enhances the unique characteristics of Abergavenny. This will create a natural continuation to the town respecting its location, heritage, culture, and natural surroundings.

Here are key approaches this masterplan encompasses to respect, and enhance the local identity:

- Incorporates design elements that reflect the area's history, such as not building development past the 110m contour line to protect sight lines.
- Including a new dedicate crossing at the entrance creatong a place and public realm promoting movement across the road to the train station.
- Showcasing local stories and art at varies opportunities throughout the POS.
- Support the use of the Welsh language by integrating bilingual signage and spaces that promote cultural events or language-learning initiatives.
- We can also use locally sourced materials where possible to maintain continuity with the area's natural environment and reduce the carbon footprint.
- The development will align with the wider region of Abergavenny through the scale, density, and pattern of development rather than disrupting the existing character.
- Paths will link to the identity of the area through and along PROWs within the site.

Connections will integrate seamlessly with existing networks, further valuing and responding to the unique features and qualities of the location.

This development not only preserves but enhances the identity of Abergavenny, ensuring it contributes positively to the area's legacy and fosters a meaningful connection for new residents and visitors alike.

A distinct identity will be established by reflecting local heritage and culture in the design, including public art, architectural details, and native planting that enhance the sense of place and community pride.



Natural play creating a fun place to be



Opportunity to hone in on local art and history, signage to the train station and beyond



Opportunity to include local art / historic significance in paths and routes



Natural play-on-the-way



Opportunity for natural edges to the development respecting local character and built form



Opportunity for nature trails - local heritage and identity trails

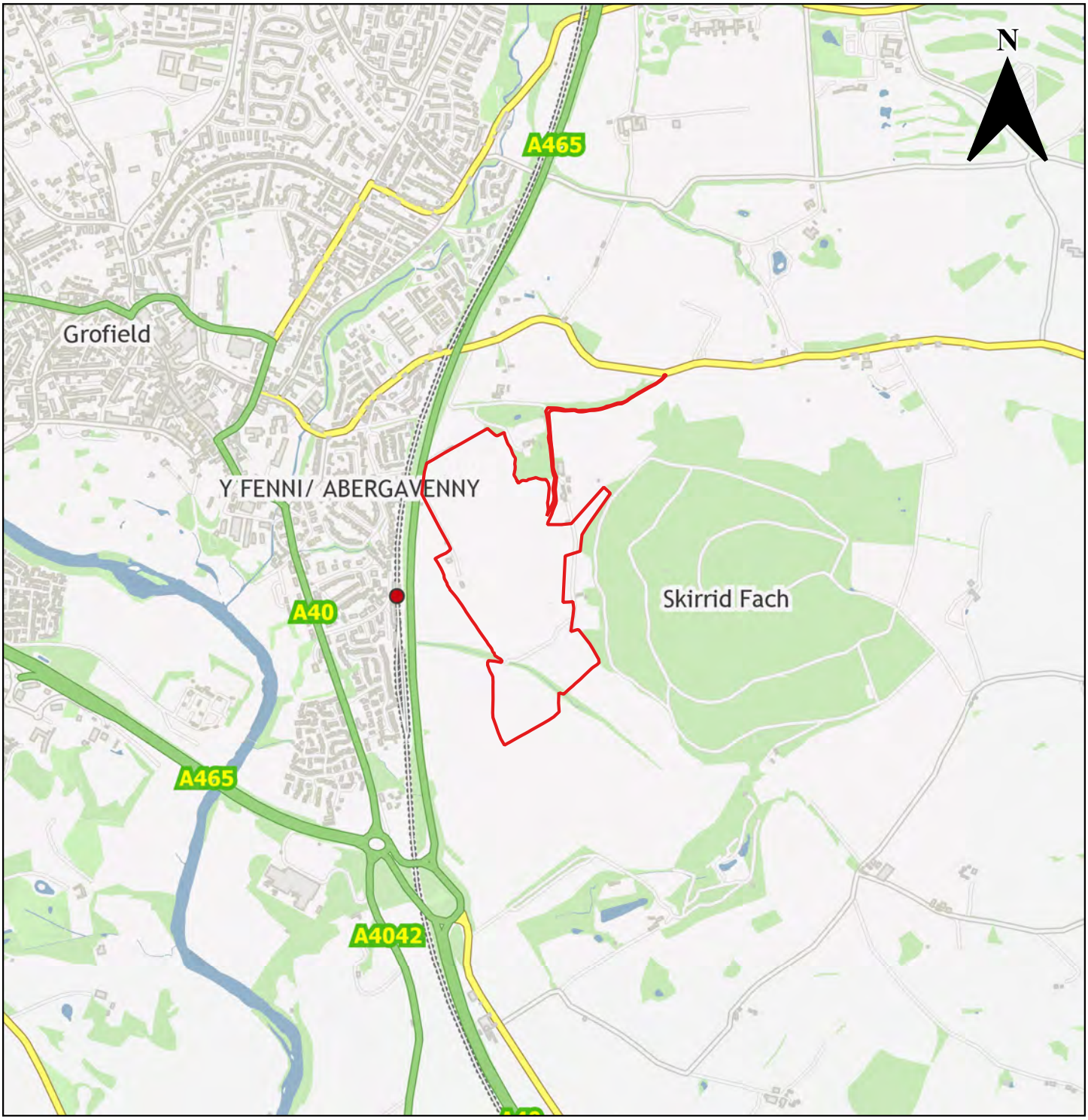
People
Location
Movement

Designed for Placemaking

Mixed Use
Public Realm
Identity

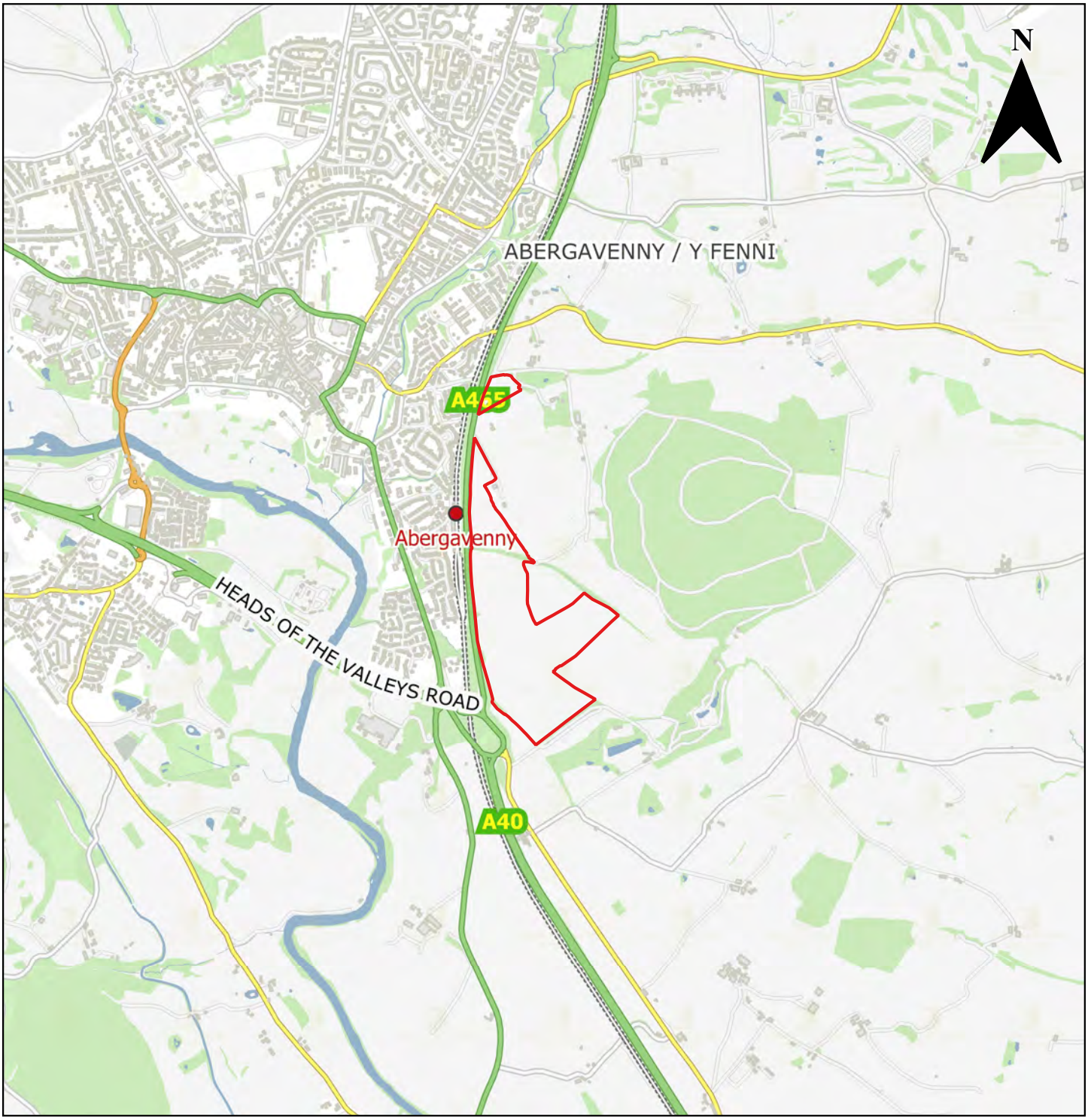
Appendix 9

Candidate Site Boundaries (Land Ownership)



Candidate Site Number	CS0213
Site Name	Land east of A465
Site Promoter	Monmouthshire Housing Association
Settlement	Abergavenny
Ward	Gobion Fawr
Proposed Use	Mixed Use: Residential (C3), Employment (B1), Retail (A1), Leisure, Education and Community Use (D1, D2)
Site Size in Hectares	24.75 ha

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
	(c) Ordnance Survey 10023415 2021	Not to Scale



Candidate Site Number	CS0293
Site Name	Land east of A465 2
Site Promoter	Coldbrook Estate
Settlement	Abergavenny
Ward	Gobion Fawr
Proposed Use	Mixed Use: Residential (C3), Employment (B1/B8), Retail/Commercial (A1/A3), Leisure, education and community use (D1/D2)
Site Size in hectares	32.62 ha

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
	(c) Ordnance Survey 10023415 2021	Not to Scale

Archived: 14 March 2025 15:11:37
From: Jones, Emily2
Sent: Fri, 6 Dec 2024 12:38:46
To: MCC - PlanningPolicy
Cc: [redacted]
Subject: Monmouthshire Deposit Plan Representation
Importance: Normal
Sensitivity: None
Attachments:
Representation-Form.docx

Good afternoon,

Please see attached a completed representation form in response to the Deposit Plan consultation. This representation is made in relation to Residential Site Allocation Policy HA1 – Land to the East of Abergavenny and seeks amendment to the proposed allocation boundary, on behalf of Coldbrook Estate.

Due to file size restrictions, please use the below WeTransfer link to access the full representation:

WeTransfer Link: https://we.tl/t-r1bvJX0ghb

Please let me know if you have any access issues, we kindly request you confirm receipt of this representation.

[redacted]

[redacted]Her)
Graduate Planner
RPS | Consulting UK & Ireland
2 Callaghan Square
Cardiff
CF10 5AZ, United Kingdom
T [redacted]

A TETRA TECH COMPANY

Follow us on: rpsgroup.com | LinkedIn | Facebook | Instagram | YouTube

MONMOUTHSHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN CONSULTATION

POLICY HA1 - LAND TO THE EAST OF ABERGAVENNY

1. Policy and Guidance Parameters for Abergavenny East

Development of Land to the East of Abergavenny (Abergavenny East) would present a logical extension to the town containing a mix of residential uses alongside employment/commercial uses, associated facilities and services that would be well connected to local services and facilities. **We fully support the intention to allocate land to the east of Abergavenny for residential-led mixed-use development.**

The policy context underpinning the allocation and future development of Land East of Abergavenny (considered in detail at section 4) tells us that the site should:

- Demonstrate effective use of placemaking tools;
- Be a deliverable site meeting The Development Plans Manual's (2020) 'Tests of Soundness';
- Be an exemplar residential-led, mixed-use community;
- Enable people to access well-connected employment and services via efficient and sustainable journeys;
- Sustain and create places in which further fragmentation and isolation of habitats and species is avoided;
- Maximise the potential of green infrastructure and open space provision to strengthen the existing GI network;
- Grow the economy of Abergavenny (and wider areas) in a sustainable manner;
- Make the best use of resources;
- Facilitate accessible and healthy environments;
- Create and sustain communities and
- Maximise environmental protection and limit environmental impact.

2. Proposed Framework Plan

In accordance with the above, a more sustainable alternative for Abergavenny East is presented within the proposed Framework Plan and Detailed sketch of the proposed Local Centre (see **Appendix 1)** which has been produced following the preparation of the following reports/documents (see **Appendices 2 - 8**):

- Landscape and Visual Statement (Soltys Brewster)
- Annotated Landscape Viewpoints (Soltys Brewster)
- Visual Constraints and Opportunities Plan (Soltys Brewster)
- Preliminary Ecological Appraisal (Soltys Brewster)
- Green Infrastructure Strategy and accompanying Statement (Soltys Brewster)

- Transport Access and Movement Strategy - Technical Note (RPS)
- MHA Site Access Review (RPS)
- High-level drainage strategy (RPS)

The key elements, principles and benefits of the proposed Framework Plan, are illustrated in **Table 1** below:

Table 1: Proposed Framework Plan: Key Elements, Principles and Benefits

Deliverability	The proposed Framework Plan has been planned practically and in line with placemaking principles to ensure Abergavenny East is suitable and deliverable, thus meeting the 'Tests of soundness' as required by the Development Plans Manual. The Proposed Plan ensures that the critical 'western side' of the site (promoted by Coldbrook Estate) is deliverable in line with MCC's vision.
Land Use and accordance with Policy HA1	The proposed Framework Plan comprises a similar scale of development (31.4ha) to that proposed in the Deposit Plan. In accordance with site requirements as per Policy HA1, the Framework Plan facilitates: - 625 residential units (500 within the plan period, the remainder comprising potential future development) - New local centre with 58,125 sqft of potential ground floor commercial/community uses with residential development integrated (a proportion of the 500 total units). - A Park and Ride Facility (0.25ha) - Greenspace (15.6ha – includes existing landscape and attenuation) - A new 'street' (see vehicular access below) along the western edge with active frontage - LAP and LEAP facilities
Placemaking	The development East of Abergavenny is focused around the Design Commission for Wales' (DCFW) Placemaking Charter. There is a strong commitment to creating sustainable, inclusive, and people-focused places that enhance community wellbeing and reflect local identity as demonstrated in the masterplan. Please see Appendix 8 for a document outlining the development's compliance with the six DCFW Placemaking Principles.
Landscape and Visual	The proposed Framework Plan closely considers visual sensitivity. Proposed development within the Framework Plan does not extend beyond the 110m contour line. The majority of development is situated within areas of low relative baseline sensitivity (see Appendix 6 for Annotated Landscape Viewpoints and Visual Constraints and Opportunities Plan) thus minimising the visual impact of the site. Conversely, the masterplan as presented in the Deposit Plan proposes areas of residential development extending into areas of relative high baseline visibility.
Green Infrastructure	The scale and layout of the Framework Plan reflects the Green Infrastructure Strategy prepared in respect of the site and accords with PPW Chapter 6 to a greater extent than the Deposit Plan. Principally, the lower more visually contained slopes of the site correspond to habitats of low ecological value with remaining more sensitive land parcels having the capacity to accommodate GI mitigation and enhancements. In this respect, it is not clear whether the masterplan presented within the Deposit Plan is adequately underpinned by a sound Green Infrastructure Strategy as required. Where practical, the eastern development edge of the Framework Plan aligns with existing field/boundaries and hedgerows to reduce potential adverse impacts. Also, existing trees and hedgerows within the site have been retained wherever possible.

	Development blocks work with the contours of the site to help minimise engineering and retaining elements. In addition to retained features, the Framework Plan proposes an attractive green edge which extends either side of the local centre on the western boundary, strengthening the GI network.
Pedestrian and Cycle Links	The proposed Framework Plan affords strong and seamless pedestrian links to the new proposed footbridge at Abergavenny Train Station from the central arrival space of the site. In addition, the site connects into existing footpaths to Abergavenny Train Station from the south of the local centre area. Pedestrian and cycle routes link into the wider area via existing and established connections. The southernmost cycle and pedestrian connection will link new residents to existing settlements beyond the A40 - this link is not afforded by the MCC masterplan within the Deposit Plan. An existing pedestrian and cycle route in the north west of the site linking to Firs Road and the wider area is also incorporated in the proposed scheme. The proposed Park and Ride facility is easily accessible from the new local centre and train station. Existing PRoW's are retained and incorporated into the scheme facilitating east-west and north- south permeability through the site. In addition, proposed off road foot/cycle paths within the site create safe and attractive routes for residents further encouraging active travel.
Vehicular Access	The proposed Framework Plan seeks to provide a deviation in alignment, raised tables and change in materials to slow traffic, create a sense of arrival and turn the A465 into a street at the site of the vehicular access. These mechanisms also facilitate the collocation of vehicular access and other modes in the vicinity of the railway station (see above). The 'street' will also extend along the extent of the proposed local centre (comprising commercial and community uses) creating a strong frontage along the A465. There is potential for buses to serve the development via creation of new stops at this location.
Drainage	The Framework Plan proposes attenuation ponds along lower levels of the site creating an attractive green edge extending north and south of the 'community hub'.

3. Delivery

Policy HA1 – Land to the east of Abergavenny in its current iteration within the Deposit Plan is not deliverable. It is acknowledged within the supporting text of Policy HA1 that the western end of the site plays an important role in integrating the new neighbourhood with the railway station and wider Abergavenny and offers potential to provide a 'community hub' serving both the urban extension and the railway station area, park and ride facility for the railway station, and linkages to and from the allocation to the station and Abergavenny. However, the 'western end of the site' comprises land promoted by the Coldbrook Estate (see CS0293 at **Appendix 9**) in addition to land promoted by Monmouthshire Housing Association (MHA) (see CS0213 at **Appendix 9**).

Despite the promoters/landowner (Coldbrook Estate) of Candidate Site CS0293 consistently expressing willingness, MCC has chosen not to fully engage throughout the masterplanning process of the Strategic Site. As the landowner of CS0293 has not agreed to the masterplan presented in the Deposit Plan, there is no delivery mechanism for the allocation in its current form.

4. What does the policy context tell us a Key Site at Abergavenny East should look like?

The following sections seek to outline the policy context which underpins the allocation and future development of Abergavenny East.

The Development Plans Manual (Edition 3) March 2020

The Development Plans Manual states that Key Sites, such as Abergavenny East, should provide a key starting point for further design collaboration and inform detailed site-specific master planning and viability work. Abergavenny East must demonstrate effective use of placemaking tools which should be undertaken collaboratively between MCC and key stakeholders responsible for the delivery of the site (i.e. the site promoters of CS0293 and CS0213), as well as the local community.

Principally, Abergavenny East should be a deliverable site to meet the 'tests of soundness'. MCC must be able to demonstrate, in broad terms; the site is deliverable with no significant impediments to implementation.

As a site key to the delivery of the plan, the Manual requires Abergavenny East to have greater evidence to support their delivery including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. The Manual suggests these principles should be set out in Statements of Common Ground (SoCG).

Planning Policy Wales (Edition 12)

Development at Abergavenny East should strive to support well-being through placemaking (Chapter 2 of PPW); it is noted that this should be implemented in the plan making process. In order to achieve the 'right development in the right place', Abergavenny East should:

- Grow the economy of Abergavenny (and wider areas) in a sustainable manner
- Make the best use of resources
- Facilitate accessible and healthy environments
- Create and sustain communities; and
- Maximise environmental protection and limit environmental impact.

Effective strategic placemaking of Abergavenny East requires the collective consideration of the above placemaking principles.

Abergavenny East should be an active, social and productive place (Chapters 4 and 5 of PPW). Development should enable people to access well-connected employment and services via efficient and sustainable journeys, by walking, cycling and public transport. This pertains to both movement within the development and the facilitation of sustainable connections to the wider area. Further, MCC should ensure there is a strategic approach to the provision of community facilities that address the requirements of new and existing residents.

Finally, Abergavenny East should be a distinctive and natural place (Chapter 6 of PPW) in line with key policy changes relating to Green Infrastructure, Net Benefit for Biodiversity, the Step-wise Approach and Trees and Woodlands. Abergavenny East should sustain and create places in which further fragmentation and isolation of habitats and species is avoided, wherever possible, and wildlife corridors forming wider ecological networks are protected, maintained and enhanced as part of development.

MCC Vision

Abergavenny East is allocated as a Strategic Mixed-Use Development including residential (500 homes), a mixed-use neighbourhood centre, a park and ride and B1 Use Class Uses. A key principle

behind the allocation of the site is the creation of an exemplar residential-led, mixed-use community including a ‘community hub’.

Abergavenny has been identified by MCC as a ‘key GI opportunity’ (MCC Green Infrastructure Strategy, 2024). The site should maximise the potential of green infrastructure and open space provision to strengthen the existing GI network. The site should also create focal points for the community in line with placemaking objectives associated with the site.

Abergavenny East should be well integrated with the existing settlement via connection links that provide crossings across the railway line and the A465.

5. Conclusion

The proposed Framework Plan offers a more sustainable alternative for Abergavenny East than the current masterplan and seeks to better address the requirements of the site as per the policy context and outcomes sought by MCC. Therefore, this representation seeks amendment to the proposed allocation boundary.

The promoters of site CS0293 remain prepared to work with MCC and other stakeholders to masterplan a Strategic Site at Abergavenny underpinned by the proposed Framework Plan for inclusion in the RLDP.

Appendix 1

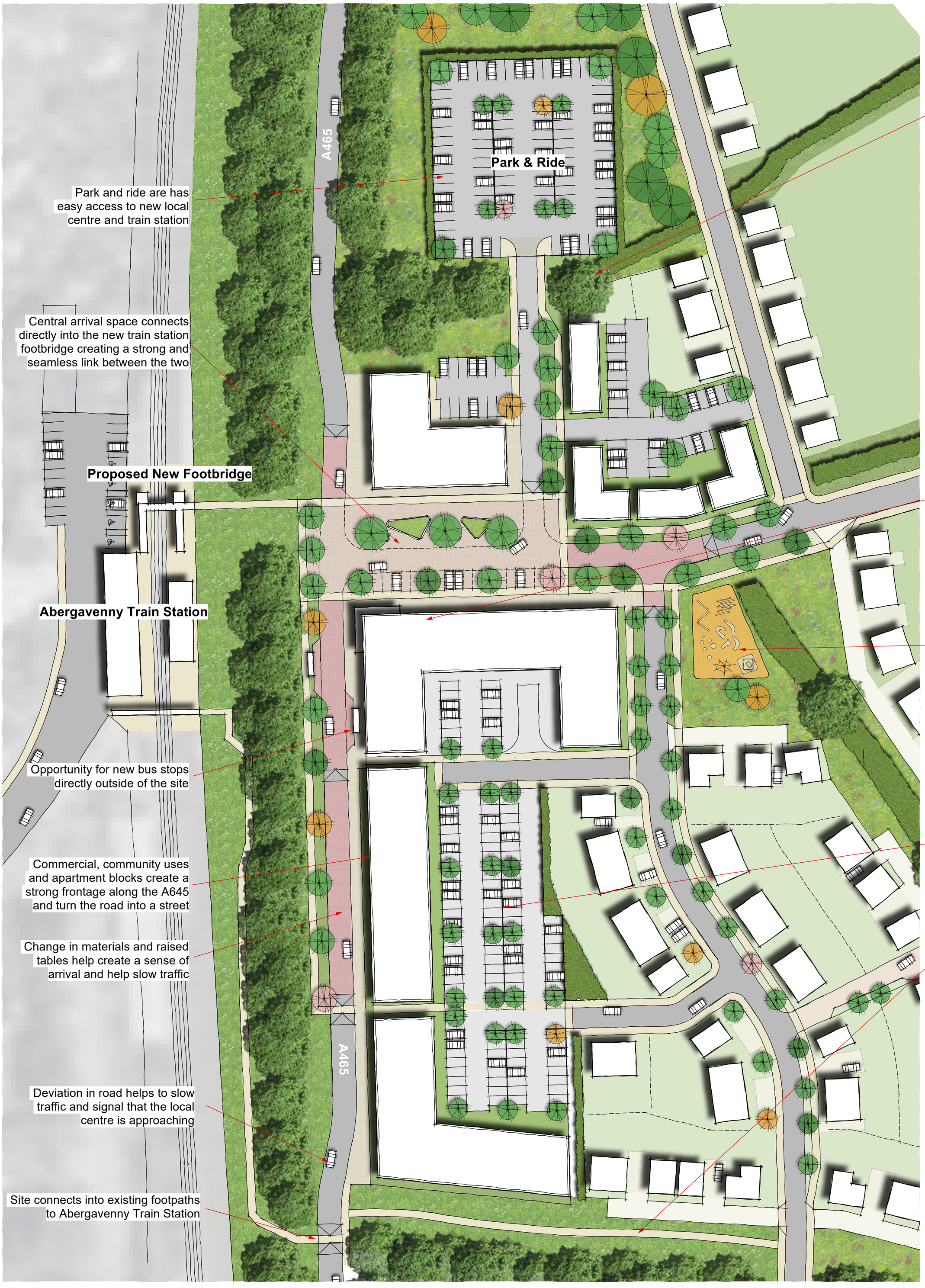
Framework Plan and Local Centre Sketch Scheme

Draft Development Masterplan



Framework Masterplan (source: RL)

1. Attenuation ponds at lowest point on the site - creates attractive green edge to the main road.
2. Development blocks work with the contours of the site to help minimise engineering and retaining elements.
3. Site Access from A465.
4. Non ticketed access to Abergavenny town centre.
5. Ticketed access to train station for residents and Park & Ride.
6. New local centre, with commercial and community uses creates entrance space and strong frontage along A465.
7. Pedestrian and cycle routes link into the wider area via existing and established connections.
8. Existing PROWs retained and incorporated into the scheme.
9. Development does not extend beyond the 110m contour line to minimise visual impact.
10. Existing trees and hedgerows wherever possible.
11. Play spaces integrated into swathes of the land to create a green focused development.



0m 10m 20m 30m 40m 50m

Roberts Limbrick
03333 405 500
mail@robertslimbrick.com
robertslimbrick.com
Registered Office: England No. 06658029

Project Name
Land East of Abergavenny

Client Name
Coldbrook Estate

Drawing Title
Local Centre Sketch Scheme

Scale	Project No.
1:500 • A1	11599

Status	Purpose Of Issue
-	-

Project	Org	Vol	Level	Form	Role
11599	RL	ZZ	XX	DR	MP

Number	Revision
SK02	-

Appendix 2

Access and Movement Technical Note

TECHNICAL NOTE

Project Title:	Abergavenny East Strategic Site (CS0213)
Report Reference:	794-PLN-WWP-JPW1602-01a (TRP)
Date:	26 March 2024

Transport Access Strategy

Introduction

1.1 RPS has been commissioned by to prepare a high-level transport access strategy in relation to the Abergavenny East Strategic Site (CS0213).

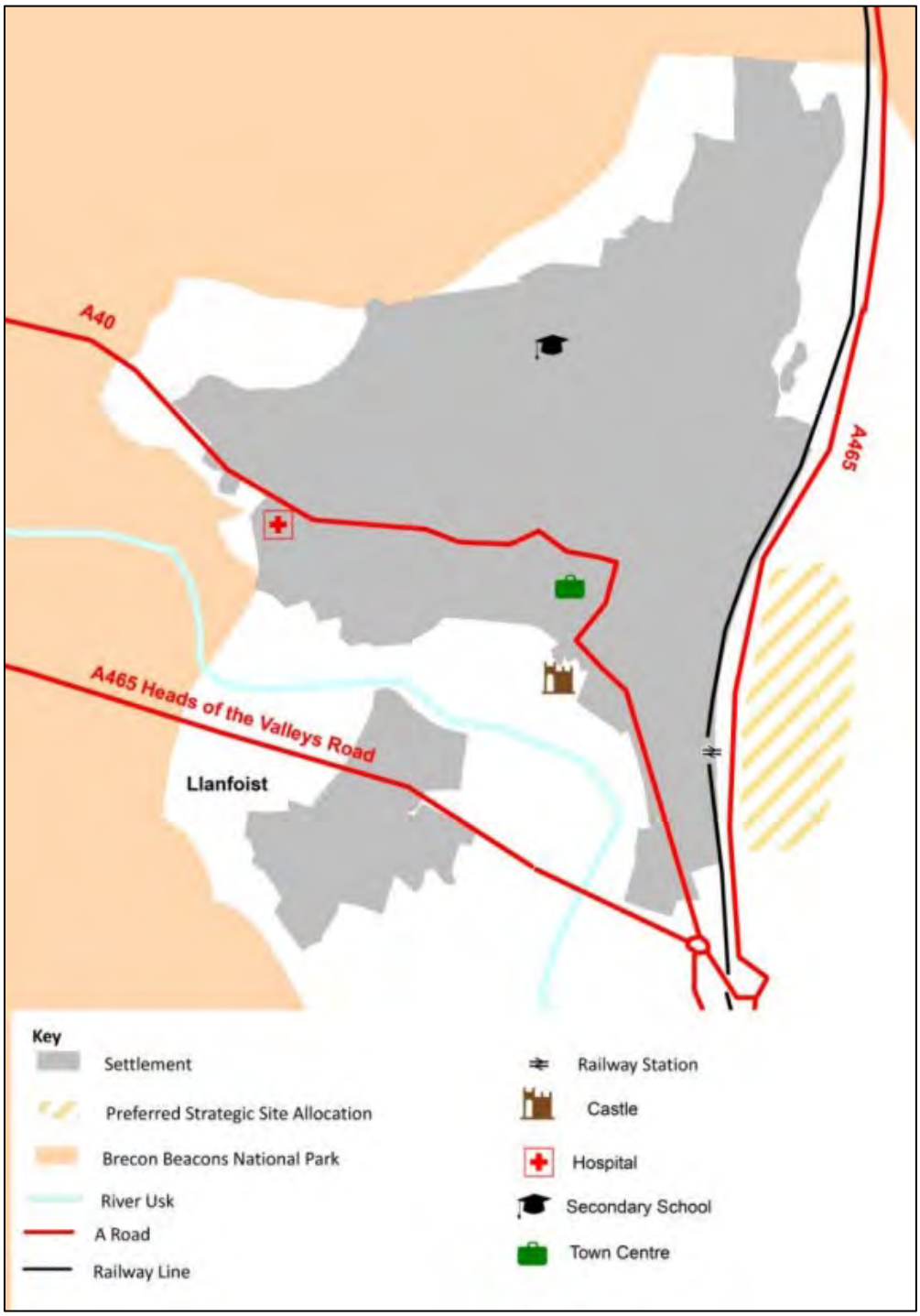
1.2 This note details the vehicular access strategy to serve the site via the A465 and the pedestrian and cycle connections.

Abergavenny East Strategic Site

1.3 The site is located to the east of Abergavenny town the A465. Abergavenny rail station is located to the west of the A465, and the railway line runs parallel to the road on a north / south alignment.

1.4 **Figure 1** details the site location.

Figure 1: Abergavenny East Strategic Site (CS0213)



1.5 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a

well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use development, containing a mix of residential uses alongside employment/commercial uses, facilities, and services.

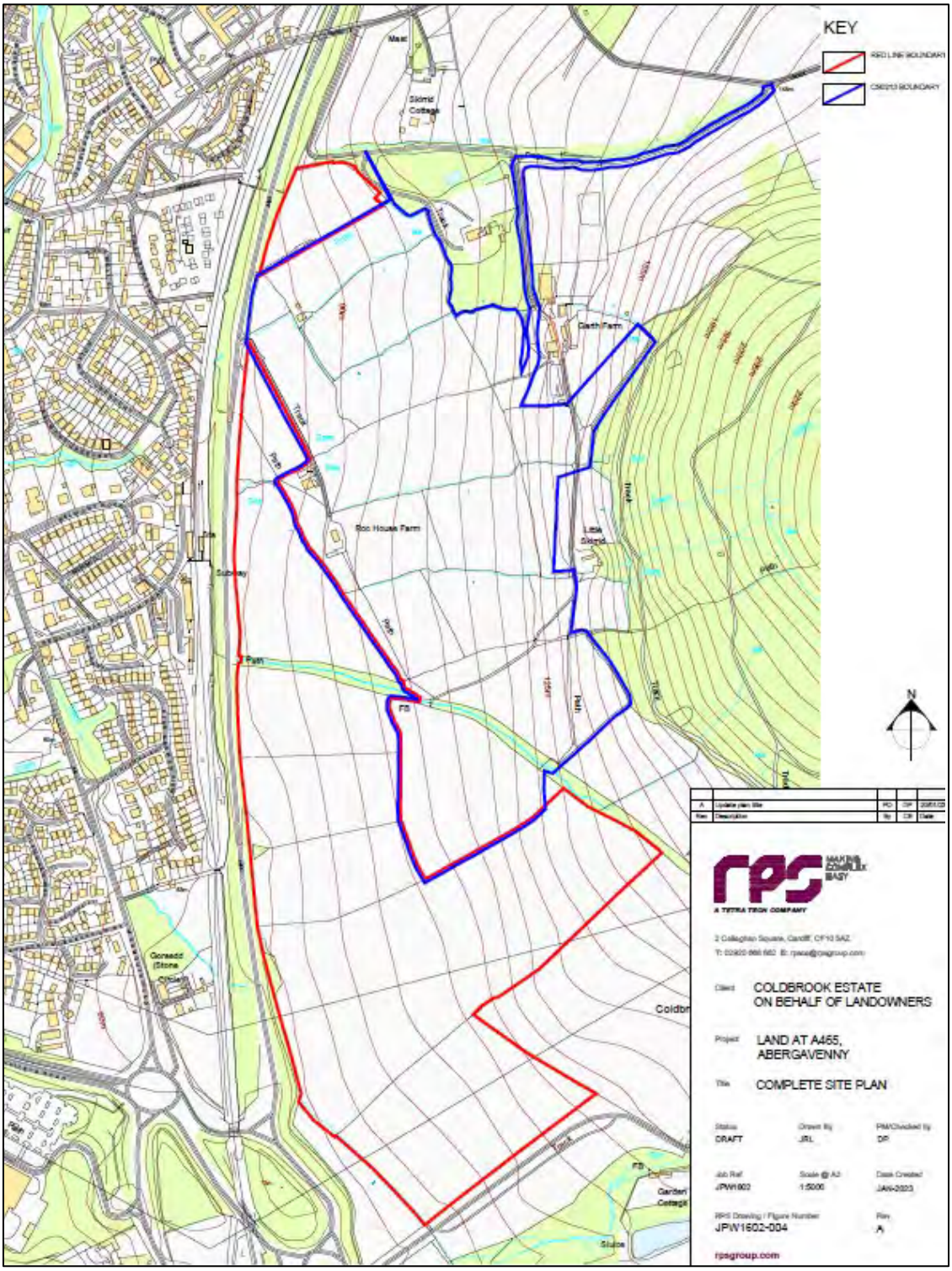
1.6 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre (0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

1.7 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update75. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW11 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.

1.8 Considering the delay with the RLDP, the time needed to open up the site (including the provision of significant infrastructure namely a cycle footway bridge over the A465 and railway) and a realistic completion rate, the size of the candidate site means development would extend beyond the Plan period. However, its allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

1.9 To deliver the Abergavenny East strategic site allocation (detailed in Figure 1) candidate sites have been submitted as detailed in **Figure 2** and the full plan is provided at **Appendix 1**.

Figure 2: Abergavenny East Strategic Site (CS0213) Candidate Sites Plan



Vehicle Access Arrangements

1.10 The A465 forms the western site boundary and provides the potential for vehicle access to the site.

1.11 Traditionally, highway authorities have argued that the larger the site, the more likely it is that a single access could be blocked preventing access for emergency vehicles. This has led to highway authorities seeking to limit the number of dwellings served via a single access and request secondary or emergency accesses beyond a certain threshold of houses.

1.12 However, since Manual for Streets (MfS) there are less stringent requirements in relation to the need for a secondary emergency access. The requirements for emergency vehicle access are generally dictated by the fire service. MfS states the following regarding fire service emergency access in the bullets to para 6.7.3:

> **"Authorities have often argued that the larger the site, the more likely it is that a single access could be blocked for whatever reason. The fire service adopts a less numbers driven approach and considers each application based on a risk assessment for the site and response time requirements."**

1.13 The scale of the proposed development could potentially be served by a single point of vehicle access, subject to the results of the fire service risk assessment. The views of the local Highway Authority will also need to be sought as part of any pre-application scoping discussions.

1.14 The other consideration will be the capacity of a single point of highway access to accommodate the existing A465 and proposed development traffic.

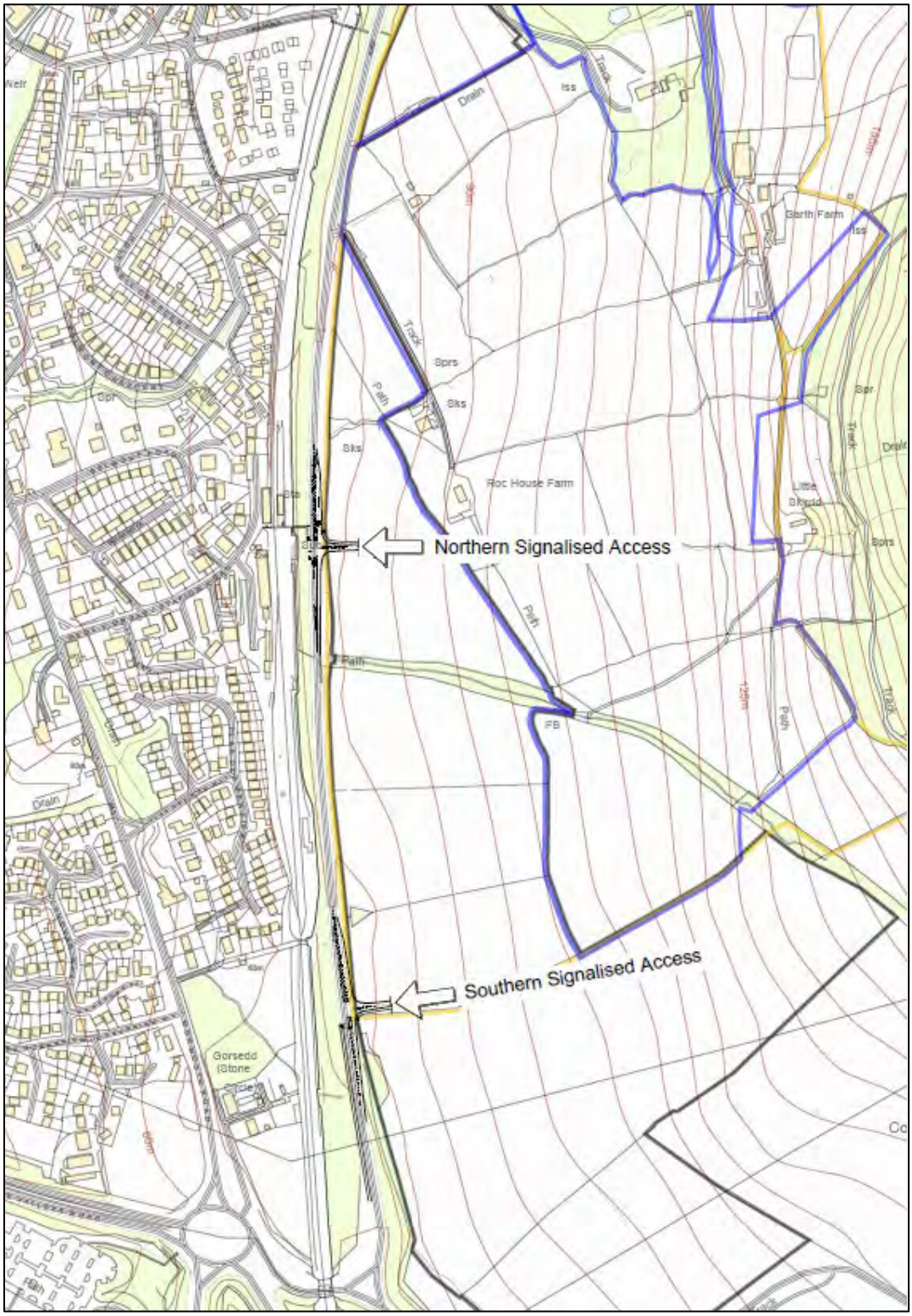
1.15 RPS has produced a preliminary design for two traffic signal-controlled vehicle access options via the A465, one located to the northwest of the site and the other to the southwest.

1.16 The northern access has been located adjacent to the existing railway bridge. This will allow for pedestrian and cycle connection to the station and Abergavenny beyond via an improved railway bridge. In addition, the northern access will provide an important traffic calming effect at the point where pedestrians and cyclists cross the A464 to access the railway bridge.

1.17 The southern access has been located close to the roundabout with the A40 and the existing cycleway on the western side of the A465.

1.18 The location of the northern and southern access arrangements is detailed in **Figure 3**.

Figure 3: Northern and Southern Signal Controlled Access Options

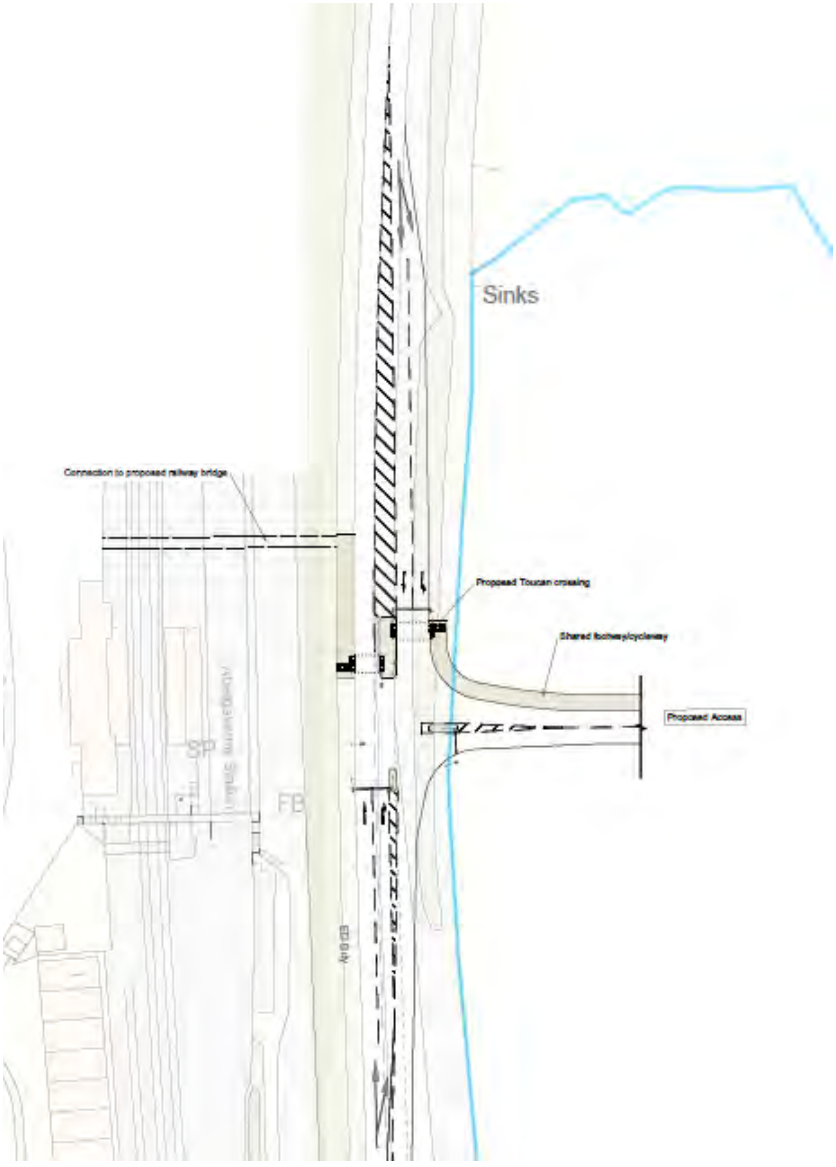


1.19 The northern and southern access arrangement options are described in greater detail below.

Northern Traffic Signal Controlled Access – Option 1

1.20 The preliminary design of a signalised junction is detailed in **Figure 4** and the full design provided at **Appendix 2**.

Figure 4: Northern A465 Signalised Access – Option 1



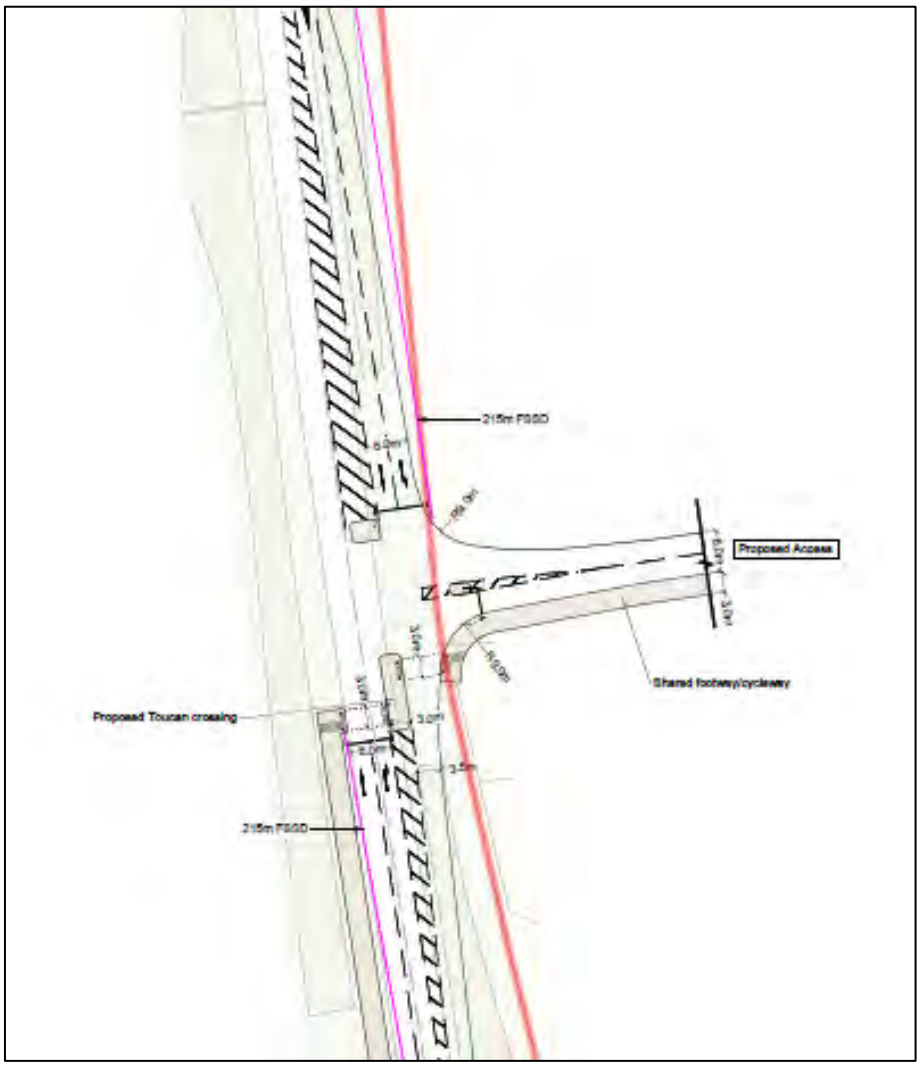
1.21 The signalised junction has been designed in accordance with the standards contained in the Design Manual for Roads and Bridges CD 123 'Geometric design of at-grade priority and signal-controlled junctions.

1.22 The signalised junction also details the proposed connection to the railway bridge to provide access to the railway station and Abergavenny to the west of the site.

Southern Traffic Signal Controlled Access – Option 2

1.23 The preliminary design of a signalised junction is detailed in **Figure 5** and the full design provided at **Appendix 3**.

Figure 5: Southern A465 Signalised Access – Option 2



1.24 The signalised junction has been designed in accordance with the standards contained in the Design Manual for Roads and Bridges CD 123 'Geometric design of at-grade priority and signal-controlled junctions.

1.25 The signalised junction also includes facilities to connect to the existing cycleway on the western side of the A465, to the south of the junction. The design initially includes crossing facilities via

the southern arm. However, if the southern signalised access option is not provided, there will be requirement to provide a standalone signalised crossing to accommodate pedestrian and cycle movements.

A465 Speed Reduction Measures

1.26 The development proposal will introduce built form on the eastern side of the A465 for the length of the site frontage. This is likely to change the character of the A465 for road users from a rural to more urban setting. There are opportunities to reduce the existing National speed limit from 60mph to either a 50mph or 40mph speed limit. The proposed signalised access to the site will also assist with breaking up vehicle speeds and provide a traffic calming effect.

1.27 The opportunities to reduce the existing speed limit would need to be explored with the Highway Authority as part of the more detailed transport planning work to support a planning application. Any changes to the existing speed limit on the A465 will require a traffic regulation order and will need to be agreed with the Highway Authority and Police in principle.

Pedestrian and Cycle Movements

Strategic Pedestrian / Cycle Connection – Abergavenny Railway Footbridge

1.28 The existing high speeds on the A465 do not provide a conducive environment for pedestrians and cyclists. A pedestrian and cycle connection to the existing railway footbridge is required.

1.29 Abergavenny railway station is currently served by a footbridge that connects the two platforms and connects to the western verge of the A465. The existing railway footbridge is shown in **Figures 6 and 7**.

Figure 6: A465 Access to Railway Footbridge



Figure 7: Station Road Access to the Railway Footbridge



1.30 The existing railway bridge does not provide step free access between the railway platforms and the A465. In addition, there appears to be a steep level difference between the eastern side of the bridge and A465 highway verge.

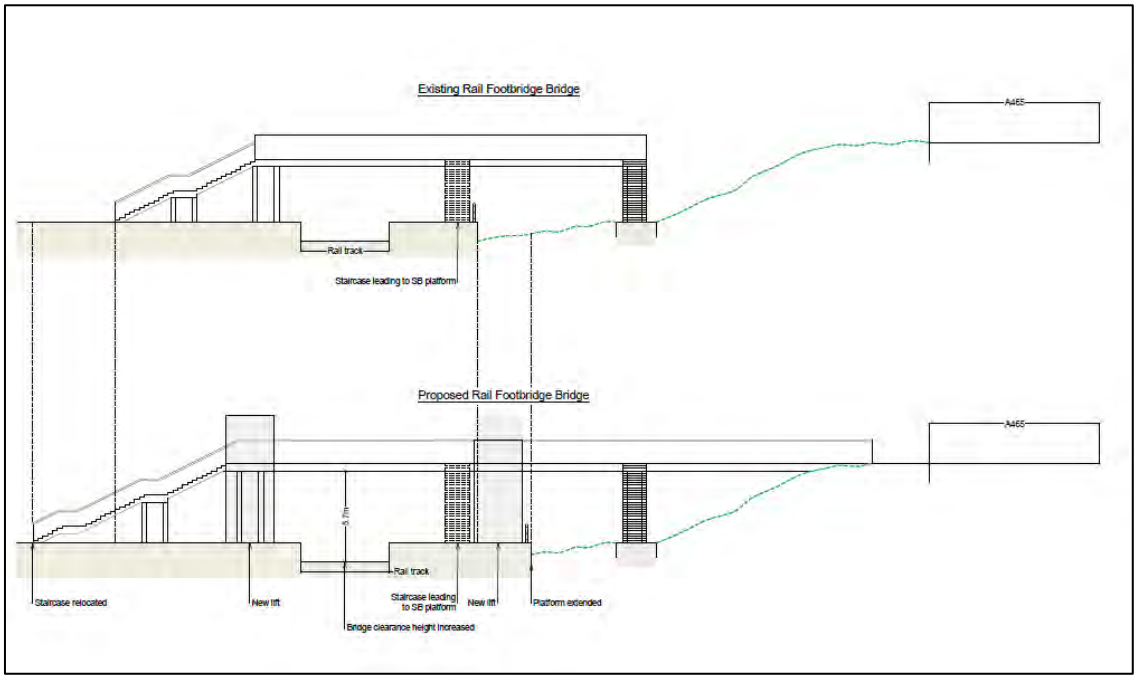
1.31 A new railway crossing will be required that provides level access from the A465 western verge and step free access to the railway platforms and Station Road. This will be a key infrastructure requirement to successfully connect the development site to the station and the existing Abergavenny settlement.

1.32 A signalised crossing will also be required on the northern arm of the proposed signalised access to facilitate pedestrian and cycle movements across the A465.

Potential Railway Bridge Improvement

1.33 The existing bridge and preliminary design of the potential railway bridge improvement is detailed in **Figure 8**. The existing bridge and proposed railway bridge is detailed in the full drawing provided at **Appendix 4**.

Figure 8: Potential Railway Bridge Improvement



1.34 The above schematic drawing details a new level access railway bridge connecting to the proposed access arrangements and pedestrian crossing on the A465. The potential railway bridge improvement includes the provision of lifts to provide accessible access to both railway platforms. Network Rail would potentially provide the station (left) side of the footbridge improvement and the development site would provide the connection to the A465 (located to the right of the railway line).

1.35 The bridge clearance height has been increased to allow for any future overhead line electrification. The cross section has been developed without the benefit of any level information such as Lidar data. Lidar data is not available for the A465, railway line and existing footbridge.

1.36 As such the proposed railway bridge design should be treated as an initial illustrative drawing to demonstrate what may be possible in terms of improvement to pedestrian and cycle connections.

Accessibility Project at Abergavenny Railway Station

1.37 It is understood that Network Rail are currently developing plans to provide disabled access to Abergavenny Railway Station. A scheme is being developed to install a new fully accessible footbridge with lifts that will link platforms one and two. The scheme will be funded by the Department for Transport's Access for All programme – match funded by the Welsh Government through Transport for Wales.

1.38 RPS have contacted Network Rail to find out more about the proposed footbridge improvements. There is the potential for the development site to tie into the proposed footbridge in terms of a level connection to the western side of the A465.

A465 – Southern Pedestrian / Cycle Access

1.39 The development site provides the opportunity to connect to the existing cycleway on the western side of the A465 that terminates to circa 130m to the north of the junction with A40. The connection will either be via the pedestrian crossing facilities detailed on the southern access Option 2 or via a standalone signalised crossing. The existing A465 cycleway is shown in **Figure 9**.

Figure 9: A465 – Southern Pedestrian / Cycle Access



Summary and Conclusion

1.40 The scale of the development proposed could potentially be served via a single point of vehicle access via the A465, subject to the results of the fire service risk assessment and capacity assessment.

1.41 Two signalised designs have been developed to access the site via the northern site boundary (Option 1) or the southern site boundary (Option 2).

1.42 The northern (Option 1) junction is preferred as it at a point on the A465 where the main pedestrian / cycle connection to Abergavenny railway station and town centre is proposed. The southern (Option 2) junction provides the potential for a secondary access if required.

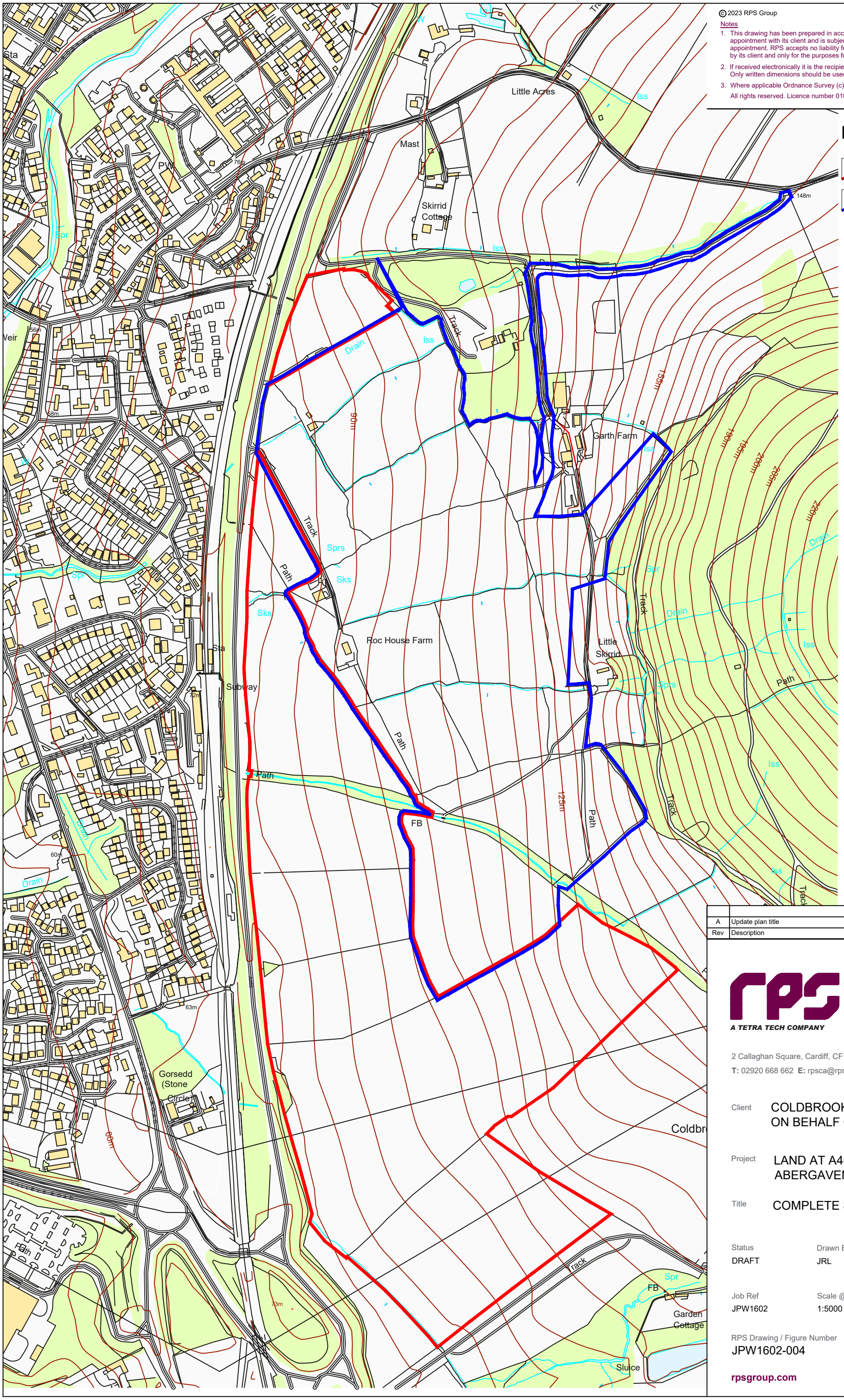
1.43 The development site benefits from excellent proximity to Abergavenny railway station. The railway footbridge will be the key pedestrian and cycle connection to link the development site to Abergavenny railway station and town centre.

1.44 A new footbridge will be required to connect the development site more effectively to Abergavenny railway station and the town centre. A schematic drawing has been developed detailing a new level access railway bridge connecting to the proposed access arrangements and pedestrian crossing on the A465. The potential railway bridge improvement includes the provision of lifts to provide accessible access to both railway platforms.

1.45 Network Rail are developing an a new fully accessible footbridge with lifts that will link platforms one and two. There is the potential for the development site to tie into the proposed footbridge in terms of a level connection to the western side of the A465.

Appendices

Appendix 1 – Land East of A465, Abergavenny Complete Site Plan



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

- RED LINE BOUNDARY
- CS0213 BOUNDARY

Rev	Description	By	CB	Date
A	Update plan title	PO	DP	20/01/23

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: COMPLETE SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	JRL	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	JAN-2023

RPS Drawing / Figure Number: JPW1602-004

Rev: A

rpsgroup.com

W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

Appendix 2 – Northern Access Arrangement Option 1

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

N

Sinks

Connection to proposed railway bridge

Proposed Toucan crossing

Shared footway/cycleway

Proposed Access

Abergavenny Station

SP

FB

ED Bdy

Path (um)

PRELIMINARY
NOT FOR
CONSTRUCTION

Scale 1:500

0 10 20 30 40

Key:

Nigel Jones Land (indicative)

See drawing JNY11641-RPS-0100-015A for swept path anaylsis

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Northern Signalised Access Aligned with Proposed Raiway Bridge

Rev	Description	By	CB	Date
A	Access relocated south	AJ	MSB	05/04/24

Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	28/03/2024

RPS Drawing/Figure Number: JNY11641-RPS-0100-014

Rev: A

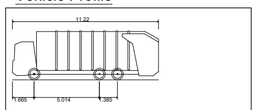
rpsgroup.com

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Vehicle Profile



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)	
Overall Length	11.220m
Overall Width	2.530m
Overall Body Height	3.756m
Min Body Ground Clearance	0.309m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	11.550m

Swept Path Key:



FOR INFORMATION ONLY

Based on drawing JNY11641-RPS-0100-014A layout

Rev	Description	By	CB	Date
A	Access relocated south	AJ	MSB	05/04/24

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Northern Signalised Access - Swept Path Analysis

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

RPS Drawing/Figure Number JNY116411-RPS-0100-015 Rev A

rpsgroup.com

Scale 1:500
0 10 20 30 40

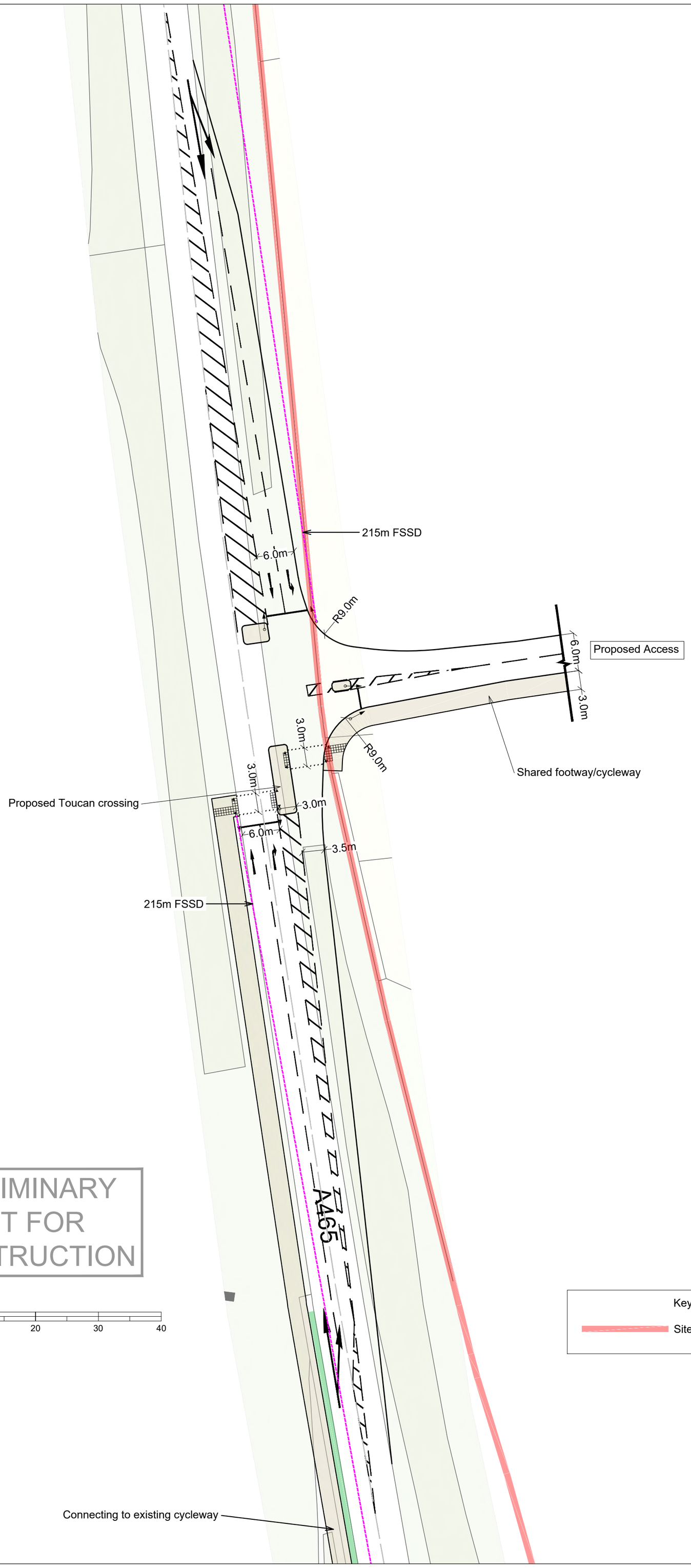
Appendix 3 – Southern Access Arrangement Option 2

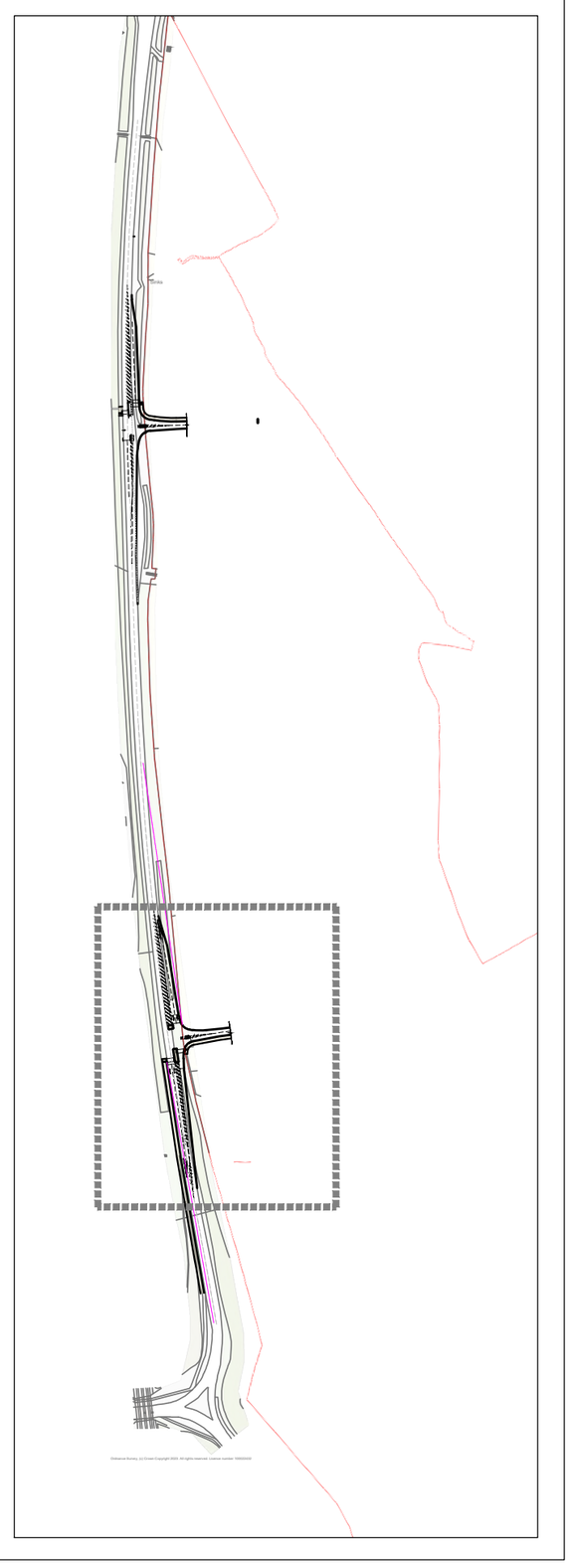
© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

N





PRELIMINARY
NOT FOR
CONSTRUCTION

Scale 1:500

0 10 20 30 40

Key:

Site boundary

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Southern Signalised Junction Access

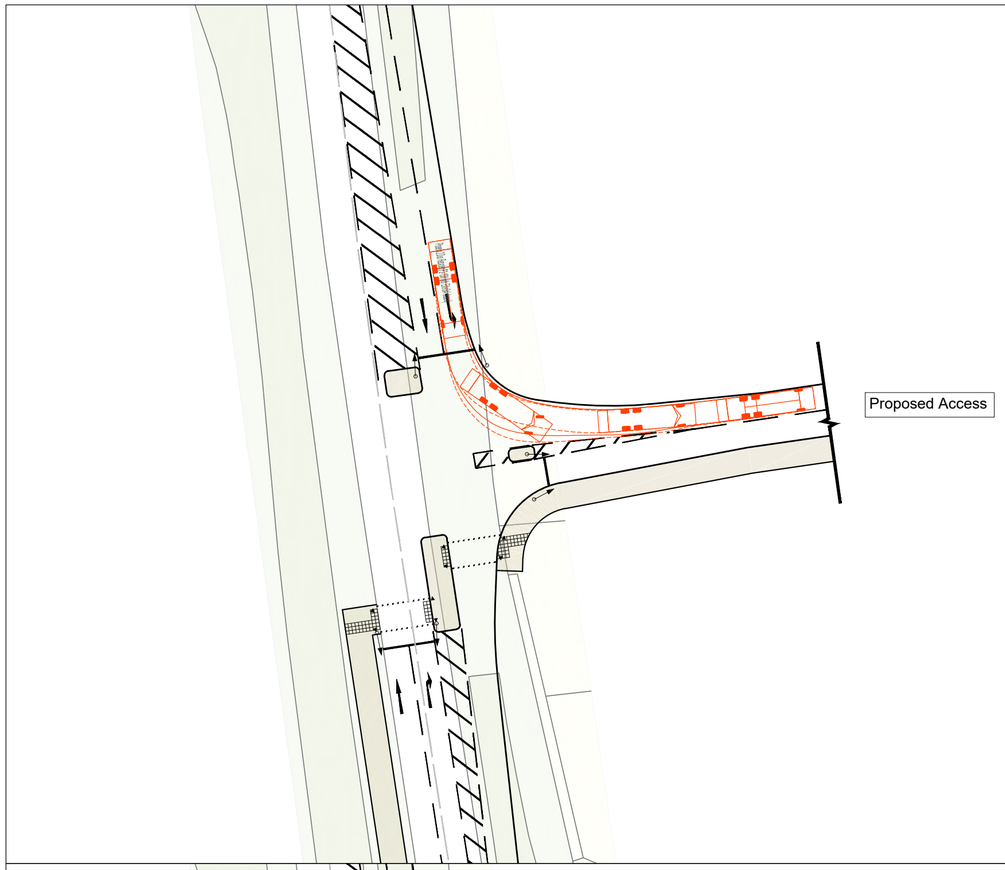
Rev	Description	By	CB	Date

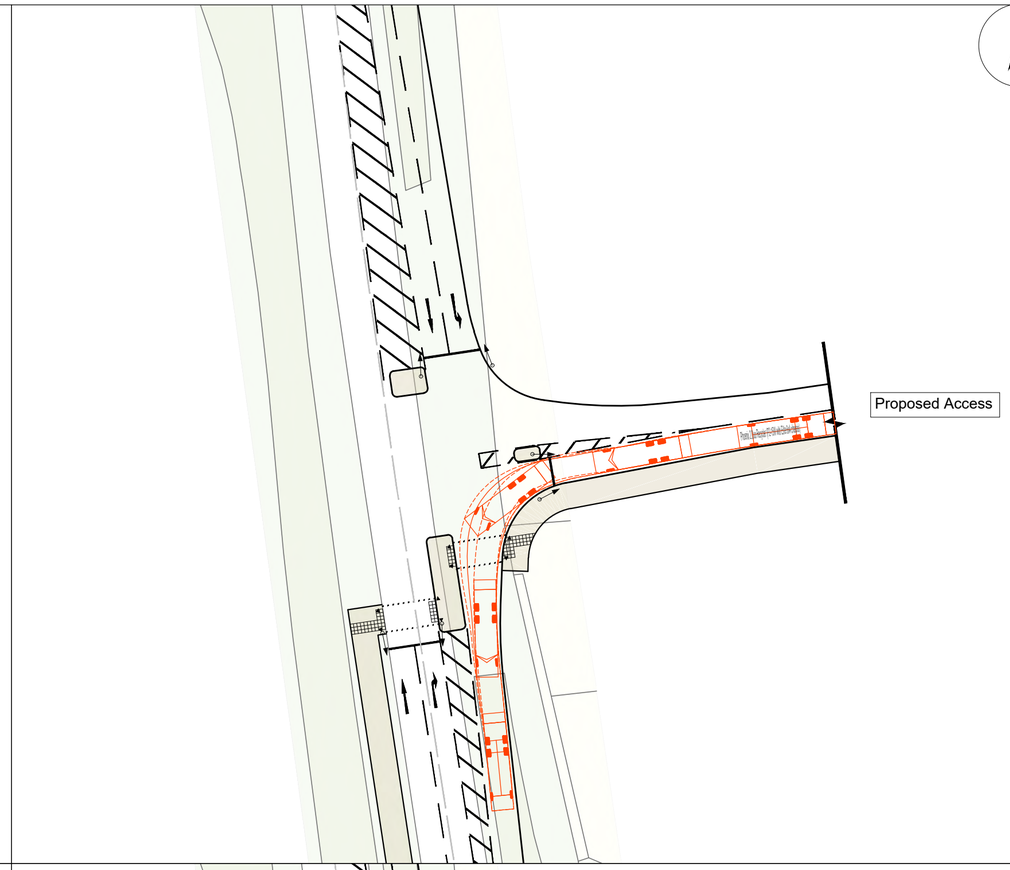
Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

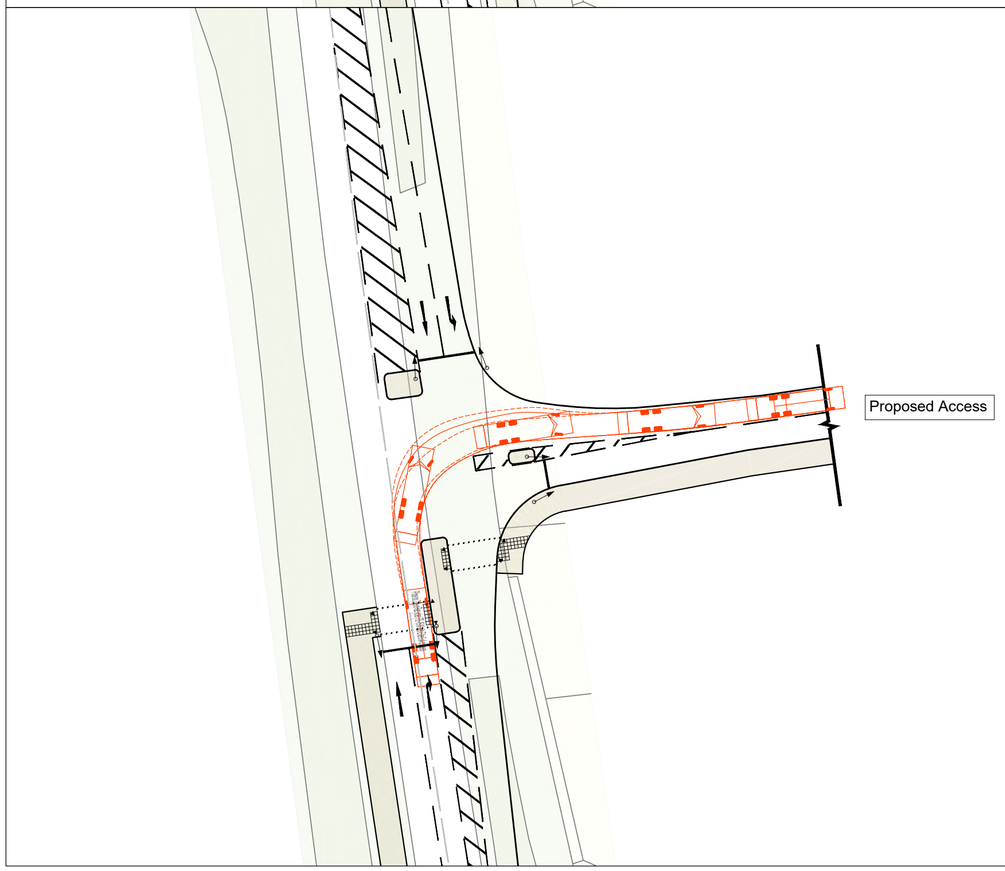
RPS Drawing/Figure Number
JNY11641-RPS-0100-007

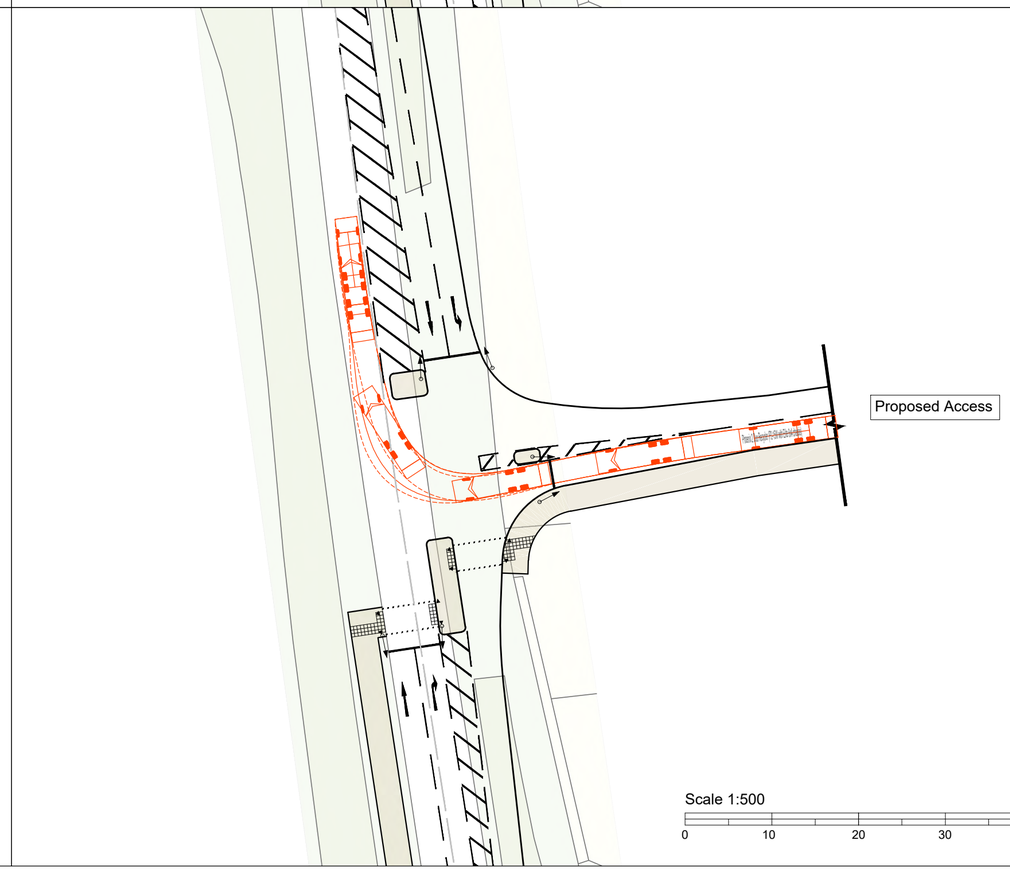
Rev

rpsgroup.com







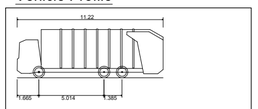


© 2019 RPS Group

NOTES

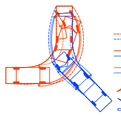
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Vehicle Profile



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)	
Overall Length	11.220m
Overall Width	2.530m
Overall Body Height	3.756m
Min Body Ground Clearance	0.309m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	11.550m

Swept Path Key:



- Body path
- Chassis path
- Wing mirror path
- Red=forward movement
- Blue=reverse movement

FOR INFORMATION ONLY

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Southern Signalised Access - Swept Path Analysis

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:500	07/03/2024

RPS Drawing/Figure Number: JNY116411-RPS-0100-008

Rev

rpsgroup.com

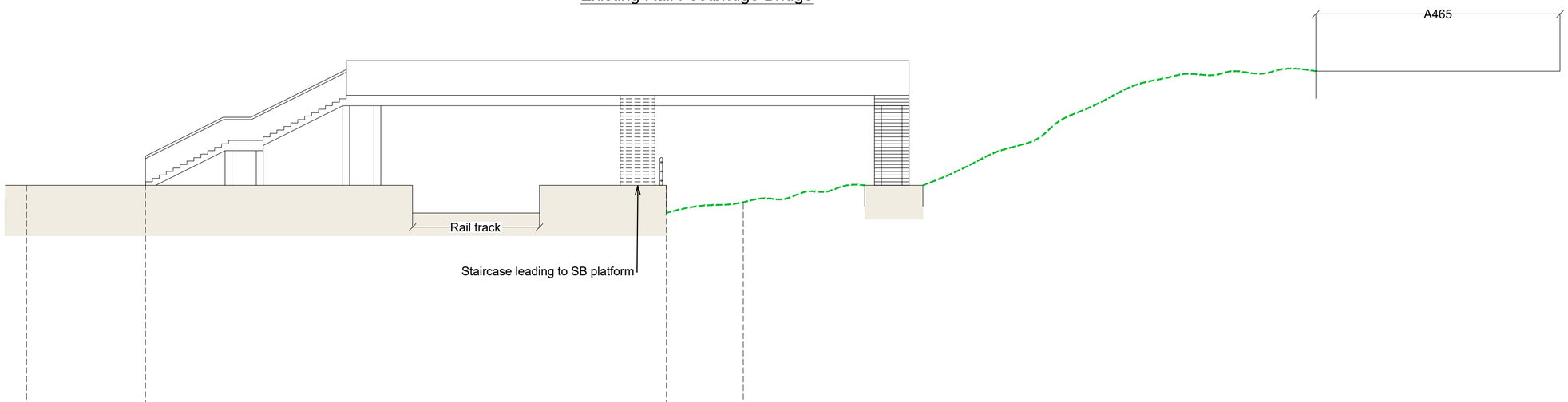
Appendix 4 – Potential Railway Bridge Improvement

© 2019 RPS Group

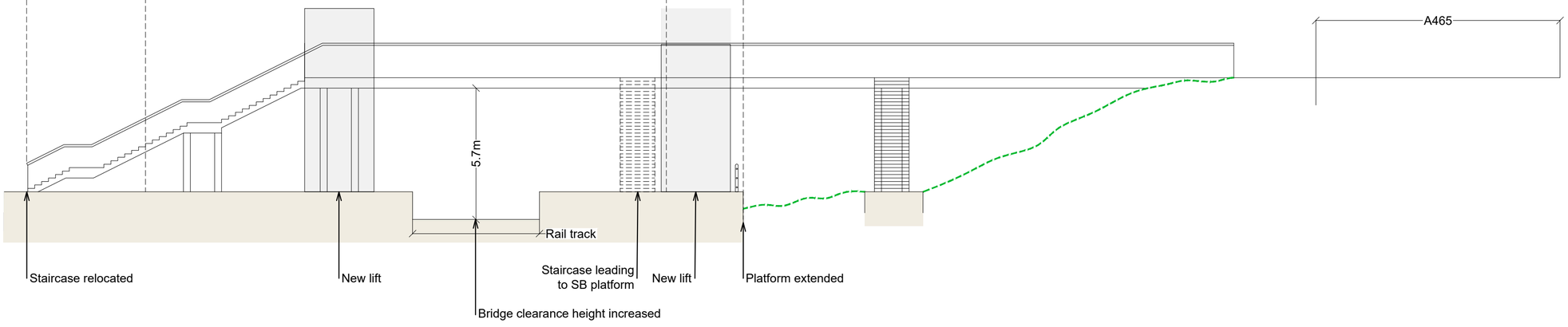
NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.

Existing Rail Footbridge Bridge



Proposed Rail Footbridge Bridge



Scale 1:150

0 5 10

PRELIMINARY NOT FOR CONSTRUCTION

This drawing has not been base any level information and is for Illustrative purposes only

Rev	Description	By	CB	Date

MAKING COMPLEX EASY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Abergavenny Rail Station
Illustrative Footbridge Proposals

Status	Drawn By	PM/Checked by
INFORMATION	AJ	MSB
Project Number	**Scale @ A2**	**Date Created**
JNY11641	1:150	13/03/2024

RPS Drawing/Figure Number
JNY116411-RPS-0100-011

Rev

rpsgroup.com

Appendix 3

MHA Highway Access Review

TECHNICAL NOTE

Project Title:	Monmouthshire Housing Association
Report Reference:	JNY11641-01a
Date:	28 November 2024

Land at Abergavenny – Monmouthshire Housing Association
Highway Access Review

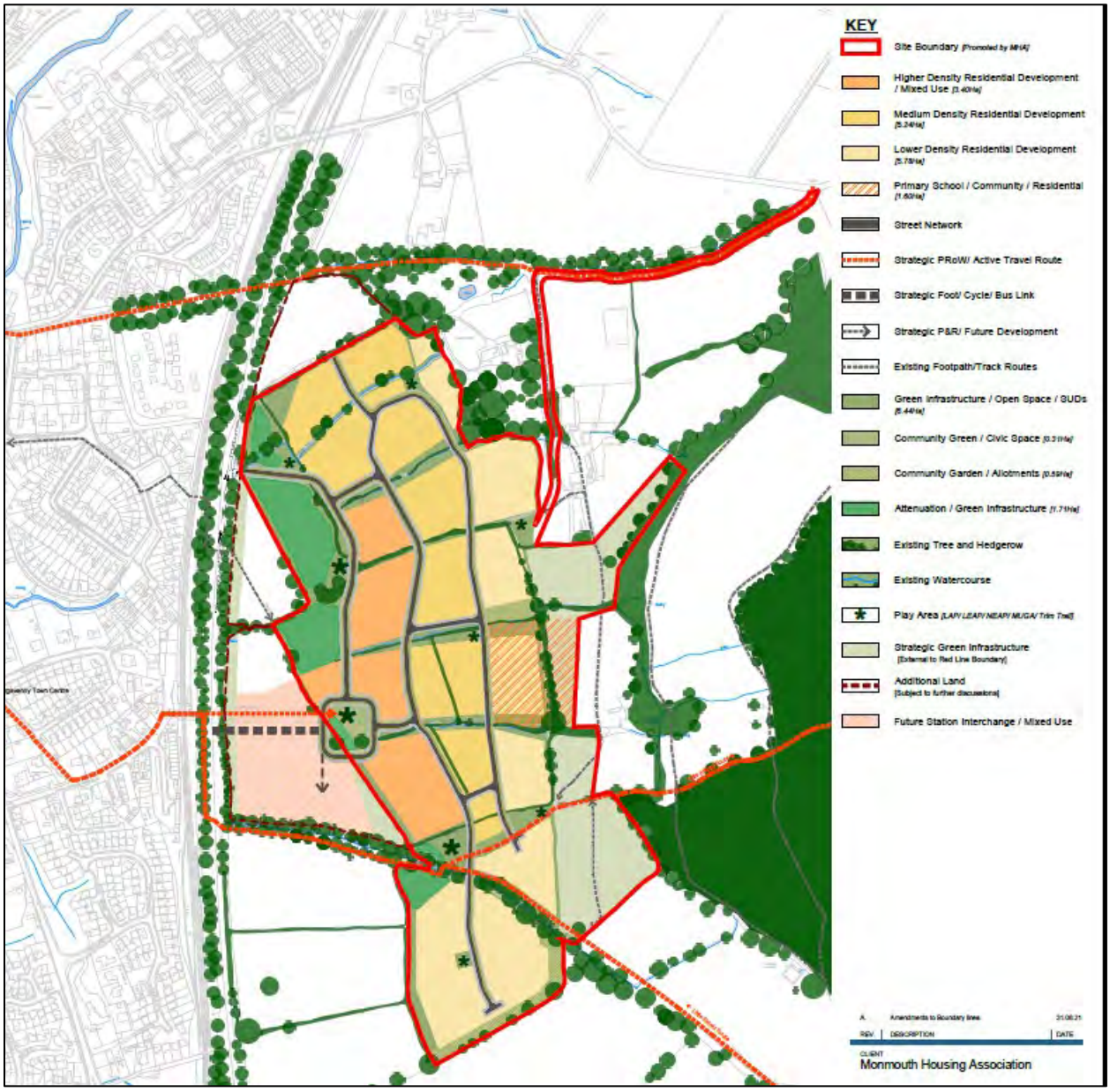
Introduction and Background

1.1 This note has been prepared on behalf of Trustees of the Coldbrook Estate to review the potential for highway access to the Monmouth Housing Association proposed residential development.

1.2 The site is located to the west of the A465 and runs parallel on a north / south alignment. It is advised that the site has the potential to accommodate circa 500 residential dwellings, primary school, and community facilities.

1.3 **Figure 1** details the initial masterplan for the site and the full masterplan is provided at **Appendix 1**.

Figure 1: Development Site

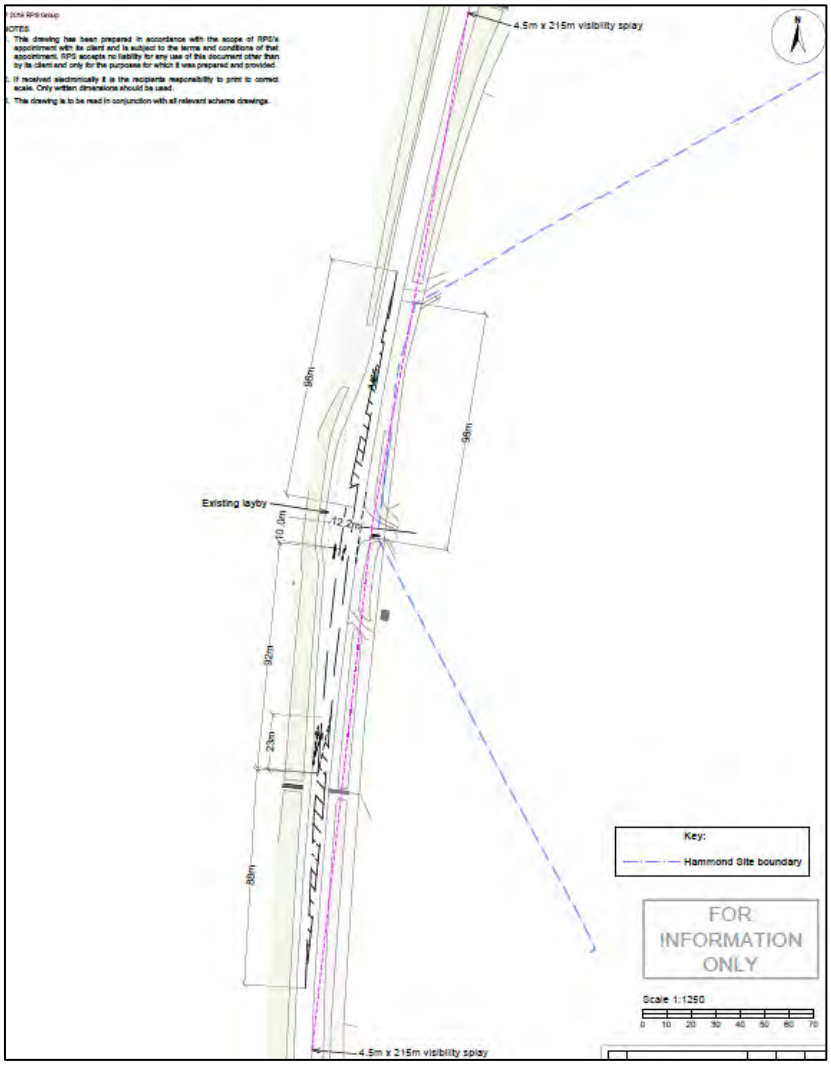


1.4 The site is served via a single point of vehicle access with the A465 located at the northwestern site boundary.

1.5 The masterplan indicates that the site has a limited site frontage of circa 100m with the A465. The masterplan details a priority junction with a 'Ghost Island' right turn lane to access the site. The priority junction is located at the southwestern extend of the frontage with the A465 in approximately the same position as an existing farm access.

1.6 It is understood that the access option detailed on the masterplan has had transport planning design input. The initial junction design has been traced by RPS from the masterplan onto OS mapping and is detailed in **Figure 2** and provided at **Appendix 2**.

Figure 2: Proposed Priority Junction Access



1.7 This note will provide an initial high-level of review of the proposed priority junction access arrangement and includes the following:

- Review the geometric requirements of potential access options and road safety considerations; and
- Review the potential for pedestrian and cycle connections to Abergavenny and the railway station.

Proposed Site Vehicle Access – Priority Junction

Junction Form and Road Safety Risks

1.8 The A465 is a two-way single carriageway road and subject to the National Speed limit (60mph) with no street lighting in the vicinity of the site.

1.9 A speed survey has been undertaken on the A465 to the south of the proposed site access. The results of the speeds are as follows based on the average 7 day 85th percentiles speeds:

- Northbound = 60.1mph
- Southbound = 64.5mph

1.10 The results of the speed survey indicate that the 85th percentile speeds are at the speed limit travelling northbound and exceed the speed limit travelling southbound. The high vehicle speeds are not surprising given the relatively straight alignment of the A465 and the lack of development on either side of the carriageway.

1.11 Given the high vehicle speeds a roundabout junction is considered the appropriate junction form to serve the site as it would provide a traffic calming effect and provide a safer access compared to the proposed priority junction. It does not appear possible to provide a roundabout junction to access the site, due to the limited frontage with the A465.

1.12 The proposed provision of a priority junction with a right turn lane raises the following road safety concerns due to the high-speed nature of the A465 in the vicinity of the site:

- **Road Safety Performance** – Priority junctions will usually have a higher collision rate and the severity of collisions will be more serious compared to a roundabout junction. The proposed priority junction will provide little traffic calming effect on the A465, apart from the provision of the tapers that form the right turn lane.
- **Turning Movement Risk** – The turning movements exiting the site and turning right into the site will need to cross the A465 with vehicles travelling at or above 60mph. Vehicles would need to judge suitable gaps in traffic to access and egress the site. There is a risk of vehicles being struck by A465 north and south bound traffic. The higher the vehicle speeds the higher the likely severity of any collision will be. The proposed single point of access via the priority junction would serve circa 500 residential dwellings, primary school and community facilities and introduce significant turning movements. The greater the level of development served via the priority junction , the greater the risk of higher severity collisions occurring.
- **Lack of nearside diverging taper** – The proposed junction design does not include the provision of a nearside diver taper (deceleration length) for vehicles turning left from the A465 into the site. Vehicles decelerating on the main A465 carriageway to turn left into the site, will reduce the capacity of the through carriageway by impeding following drivers. In addition, due to the high vehicle speeds there is the risk of high-speed rear end shunts occurring as vehicles slow to turn left. The provision of a nearside taper lane allows turning traffic to perform most of its deceleration off the main road. This improves junction capacity and safety performance. The requirement for a nearside diverging taper is set out in the Design Manual for Roads and Bridges CD123 Geometric design of at-grade priority and signal-controlled junctions. The site also includes employment development, and this could

attract larger HGV vehicle movements. This may also introduce the requirement for a nearside merging taper to allow HGVs to accelerate to join the A465.

1.13 The road safety issues associated with priority-controlled junctions on high-speed roads are well known to road safety engineers. Historic priority junctions with right turn arrangements have been identified as collision sites and require collision mitigation schemes to address safety problems. Collision reduction schemes can include removing priority arrangements and replacing them with a new roundabout.

Speed Reduction Measures

1.14 To reduce the risks associated with the proposed priority junction will require the existing high vehicles speeds on the A465 to be reduced to a more acceptable level.

1.15 The site will need to reduce the existing vehicle speeds on the A465 and the provision of a 40mph or 50mph speed limit could be considered. The introduction of the proposed development on the eastern side of the A465 would change the character of the A465 from rural to more urban to a certain extent. However, the change of character of the A465 would be constrained by the limited site frontage of the site.

1.16 A reduction of the existing speed limit on the A465 is unlikely to result in significantly reduced vehicle speeds unless the character of the road changes or traffic calming measures are put in place to physically reduce vehicle speeds.

1.17 Any changes to the existing speed limit on the A465 will require a traffic regulation order and will need to be agreed with the Highway Authority and Police.

Existing Layby

1.18 The proposed priority junction with right turn lane to access the site is located adjacent to an existing lay by, located on the western side of the A465. The proposed site access takes no account of the existing layby. The layby position and existing farm access is shown in **Figure 3**.

Figure 3: Existing A465 Layby



1.19 The provision of the proposed priority junction adjacent to the existing layby introduces the potential for conflict and confusion between vehicles accessing the layby and the proposed site. The Design Manual for Roads and Bridges CD 169 'The design of lay-bys, maintenance hardstanding's, rest areas, service areas and observation platforms' indicate that laybys should be located 375m away from junctions.

1.20 The current position of the existing access would preclude the provision of a priority junction to serve the site. The layby would need to be relocated to a suitable location as part of the highway design.

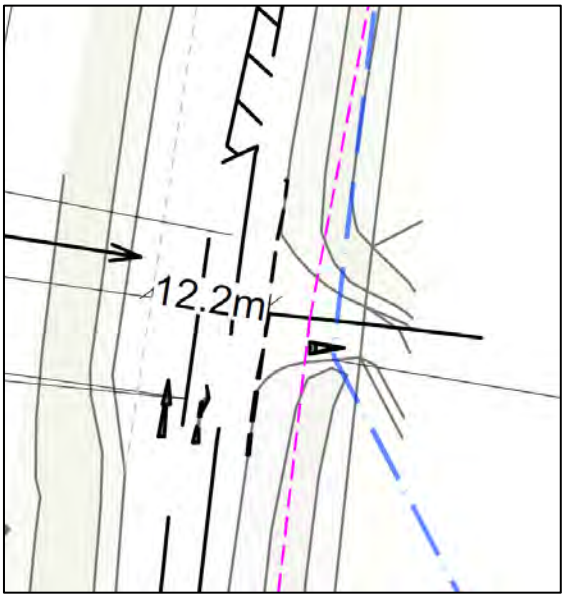
Junction Location

1.21 The proposed priority junction is located at the very southern section of the site frontage with the A465. The access design taken from the masterplan does not include the proposed access design and junction radii.

1.22 It appears that the site access will potentially encroach on land to the south of the site boundary when the proposed access width and junction radii is considered. This land forms part of the proposed Land at A465 site, detailed on the concept masterplan prepared by Pegasus.

1.23 The potential for encroachment and proximity to the Land at A465 site is shown in **Figure 4.**

Figure 4: Proposed Priority Junction Located at Southern Extent of Site Frontage with A465



1.24 The access location does not appear to be within the land ownership as currently drawn and would need to be moved further to the north to provide room for the access width and junction radii.

Potential for Alternative Access Arrangements

Roundabout Access

1.25 In terms of road safety, the provision of priority junction with right turn lane has the potential to introduce known road safety problems. The provision of a roundabout junction would result in a safer form of junction to access the site for the following reason:

- A roundabout provides a significant traffic calming effect and reduces vehicle speeds at the point where vehicles would be accessing the development. The design requirement for the roundabout ensures that vehicle speeds entering the roundabout unopposed, will be a maximum of circa 30mph. Therefore, the reduced vehicle speeds at a roundabout junction would result in reduced collision severity, compared to a priority arrangement.

1.26 The site has limited site frontage of circa 100m with the A465. The lack of site frontage effectively prohibits the ability to access the site via roundabout junction. The roundabout would need to be developed to the east of the A465 alignment to achieve suitable entry deflection requirements. This would result in the stopping sight distance in the southbound approach to the give way line encroaching on land outside the control of the development. This design factor is likely to have resulted in the choice of a priority junction to access the development, as a roundabout junction is not geometrically possible in this location.

Signal Control Junction

1.27 The provision of a traffic signal control junction arrangement is considered potentially more achievable than a roundabout access to serve the site. However, the most significant disadvantage of traffic signals will be their impact on the A465 compared to a roundabout. The separate staging of vehicle movements via signal control will introduce delay on the A465. In addition, the existing vehicle speeds would need to be reduced to allow a signal arrangement to be an effective option.

Summary

1.28 The proposed priority junction with right turn lane to serve the site does not appear to be deliverable as currently detailed on the master plan for the following reasons:

- Road Safety Risks – Turning movements on a high-speed road;
- The existing layby position has not been taken account of and would prevent access in the location shown; and
- The site access encroaches on third party land.

1.29 The provision of a roundabout would be the preferred option in terms of providing safe access arrangement and reducing vehicle speeds on the A465.

1.30 The site has limited site frontage of circa 100m with the A465. The lack of site frontage effectively prohibits the ability to access the site via roundabout junction.

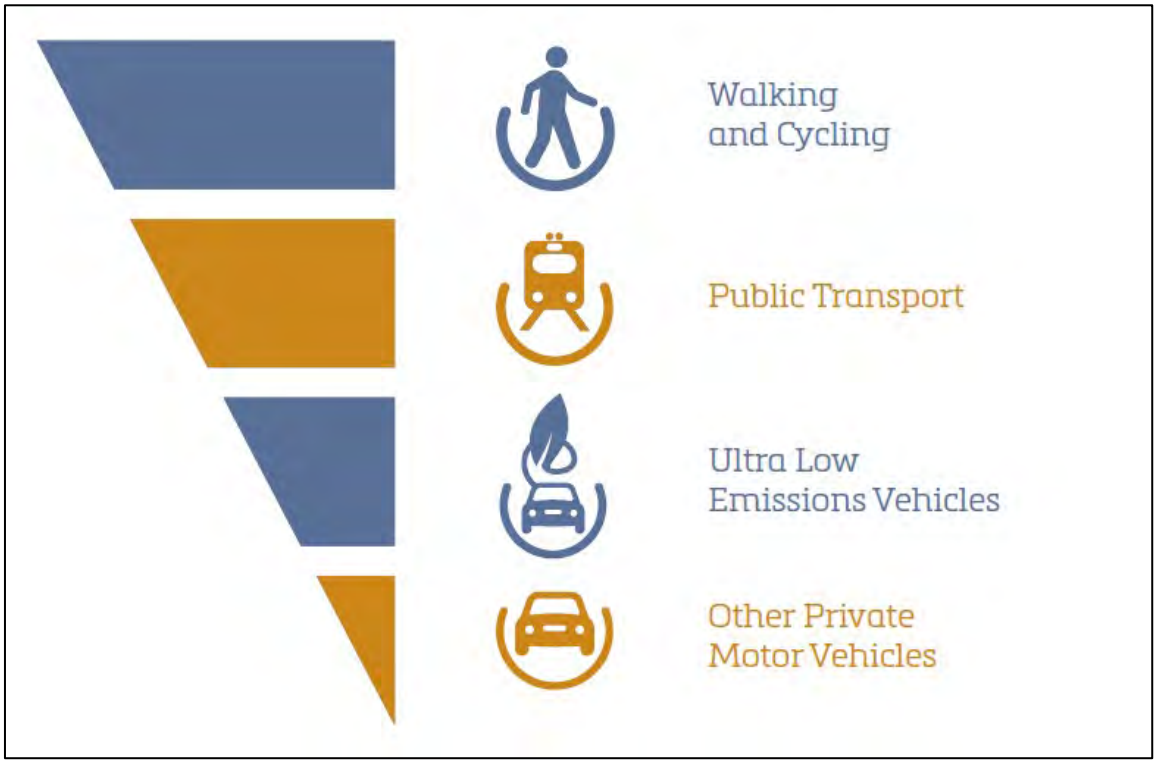
1.31 The provision of a traffic signal-controlled junction could be considered to serve the site. However, the provision of signals would introduce additional delay on the A465 and would also likely require the existing high vehicle speeds to be reduced.

Pedestrian and Cycle Connections to Abergavenny and the Railway Station

1.32 The proximity of the site to Abergavenny Railway Station and the town centre offers the potential to maximise opportunities for a mode shift to more sustainable forms of transport and offers an opportunity for transit-orientated development.

1.33 Planning Policy Wales (PPW) Edition 11 (2021) details at Figure 9: The Sustainable Transport Hierarchy for Planning within the Policy document shows the hierarchical approach to reduce vehicle trips and is replicated below.

Figure 5: PPW 12: The Sustainable Transport Hierarchy for Planning



1.34 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations and support the delivery of schemes located, designed, and supported by infrastructure which prioritises access and movement by active and sustainable transport.

1.35 The sites strategic pedestrian / cycle / bus connection to the west of the site is not deliverable, without the use of land that comprises the southern Land at A465 development site. The site therefore not integrated with sustainable transport and does not provide suitable active travel connections to the local facilities in Abergavenny and is at odds with the PPW 12 Sustainable Transport Hierarchy.

1.36 The proposed vehicle access to the site does not include the provision of any pedestrian facilities. The master plan promotes a strategic pedestrian / cycle / bus connection to the west of the site that links to the railway footbridge. This will be the key pedestrian and cycle connection to encourage active travel and to link the site to Abergavenny railway station and town centre.

1.37 This connection is detailed in an extract of the masterplan provided at **Figure 6.**

Figure 6: Site – Strategic Pedestrian / Cycle / Bus Connection



1.38 The above connection is outside of the site red line boundary and would be reliant on the Land at A465 site to deliver.

1.39 The Land at A465 development site provides better options for connectivity to Abergavenny town centre and railway station. The southern site would also maximise the opportunities for sustainable transport by providing a strong pedestrian and cycle connection to the railway bridge and locating the transport hub (Park and Ride) and vehicle access in the same location.

1.40 The site masterplan also details a connection to Public Right of Way (PRoW) 352/12/2 that crosses the railway line via an uncontrolled at grade pedestrian crossing. The PRoW then connects to Hollywell Crescent via a very narrow path between properties 67 and 72. This PRoW connection is not considered suitable to connect the site to Abergavenny. The railway crossing may need to be closed if footfall increases. Network Rail's long-term strategy is to enhance crossing safety by managing and mitigating the risk at crossings. The most effective management tool available to Network Rail to eliminate risk is to close crossings.

1.41 The site could include pedestrian and cycle facilities via their frontage and proposed site access with the A465 and then connect via a crossing to the western side of the A465. However, the existing high speeds on the A465 do not provide conducive conditions for pedestrians or cyclists to route adjacent to the carriageway.

1.42 The provision of a stand-alone signalised crossing would also be required to connect to the existing railway footbridge that provides access to the railway station and town centre. The existing high vehicle speeds on the A465 would also prohibit the provision of such a crossing and

the speed limit would need to be reduced to 50mph. Alternatively, a structure could be provided to cross the A465 and railway line, however, this option would be expensive and unsightly.

1.43 Planning Policy Wales (PPW) Edition 11 (2021) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. Chapter 4 Active and Social Places details the policies in relation moving within and between places and Transport.

1.44 The active and social theme details the following aim at paragraph 4.0.3 in relation to the creating of sustainable development:

> **"4.0.3 This theme aims to ensure new development is located and designed in a way which minimises the need the travel, reduces dependency on the private car and enables sustainable access to employment, local services, and community facilities. This will be achieved through integrating development with sustainable transport infrastructure and designing schemes in a way which maximises provision and use of sustainable forms of travel, including prioritising these modes over the private car."**

1.45 The sites pedestrian and cycle connection to Abergavenny railway station and town centre is not deliverable, without the use of land that comprises the southern Land at A465 development site. The site therefore not integrated with sustainable transport and does not provide suitable active travel connections to the local facilities in Abergavenny.

Summary

1.46 The proposed pedestrian / cycle connections from the site would only be deliverable via the land outside of their red line boundary (southern site). Pedestrian and cycle facilities that route alongside the high speed A465 would not provide a conducive environment for pedestrians.

1.47 Therefore, the opportunities for effective pedestrian and cycle connections appear to be limited and is at odds with the PPW 12 Sustainable Transport Hierarchy. Co-operation with the proposed southern Land at A465 development site is recommended.

Appendices

Appendix 1 – Site Masterplan

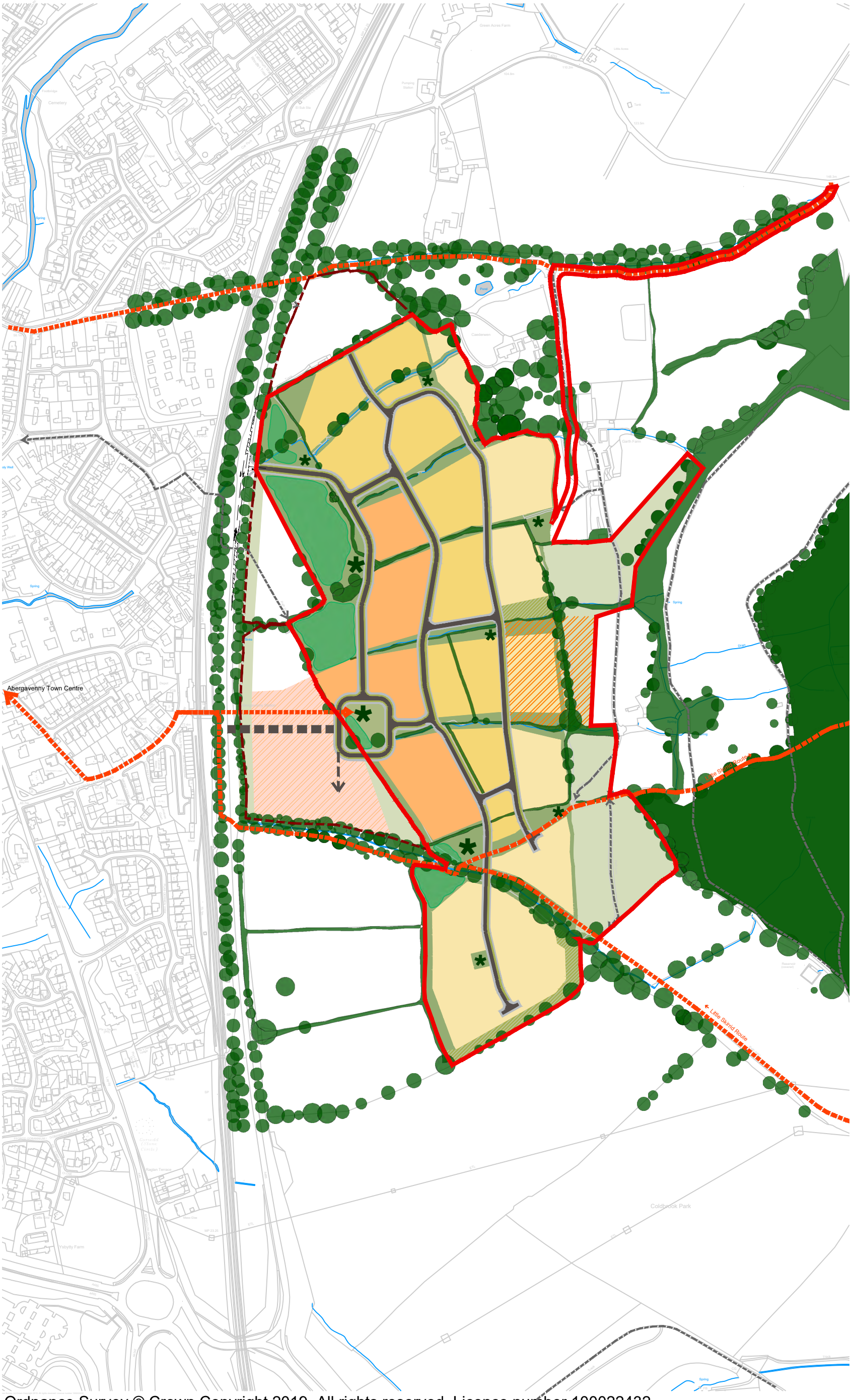
LAND EAST OF ABERGAVENNY
LDP CANDIDATE SITE

Scale 1:5000

0 50 100 150 200 250 500 750

N

LAND USE FRAMEWORK PLAN



KEY

- Site Boundary *[Promoted by MHA]*
- Higher Density Residential Development / Mixed Use *[3.40Ha]*
- Medium Density Residential Development *[5.24Ha]*
- Lower Density Residential Development *[5.78Ha]*
- Primary School / Community / Residential *[1.60Ha]*
- Street Network
- Strategic PRoW/ Active Travel Route
- Strategic Foot/ Cycle/ Bus Link
- Strategic P&R/ Future Development
- Existing Footpath/Track Routes
- Green Infrastructure / Open Space / SUDs *[6.44Ha]*
- Community Green / Civic Space *[0.31Ha]*
- Community Garden / Allotments *[0.59Ha]*
- Attenuation / Green Infrastructure *[1.71Ha]*
- Existing Tree and Hedgerow
- Existing Watercourse
- Play Area *[LAP/ LEAP/ NEAP/ MUGA/ Trim Trail]*
- Strategic Green Infrastructure [External to Red Line Boundary]
- Additional Land [Subject to further discussions]
- Future Station Interchange / Mixed Use

REV.	DESCRIPTION	DATE
A.	Amendments to Boundary lines.	31.08.21

CLIENT
Monmouth Housing Association

JOB TITLE
Abergavenny Extension

DRAWING TITLE
Land Use Framework Plan

SCALE @ A3	DATE	DRAWN BY
1:5000	August '21	KE
JOB NO.	DRAWING NO.	REVISION
1909	LUF-01	A

hammond Architectural Ltd
10 Gold Tops
Newport
NP20 4PH
t. 01633 844970
e. info@hammond-ltd.co.uk
www.hammond-ltd.co.uk

© Hammond Architectural Limited 2020
Figured dimensions must be taken in preference to scaled dimensions and any discrepancies are to be referred to Hammond Architectural Ltd. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any workshop drawings.

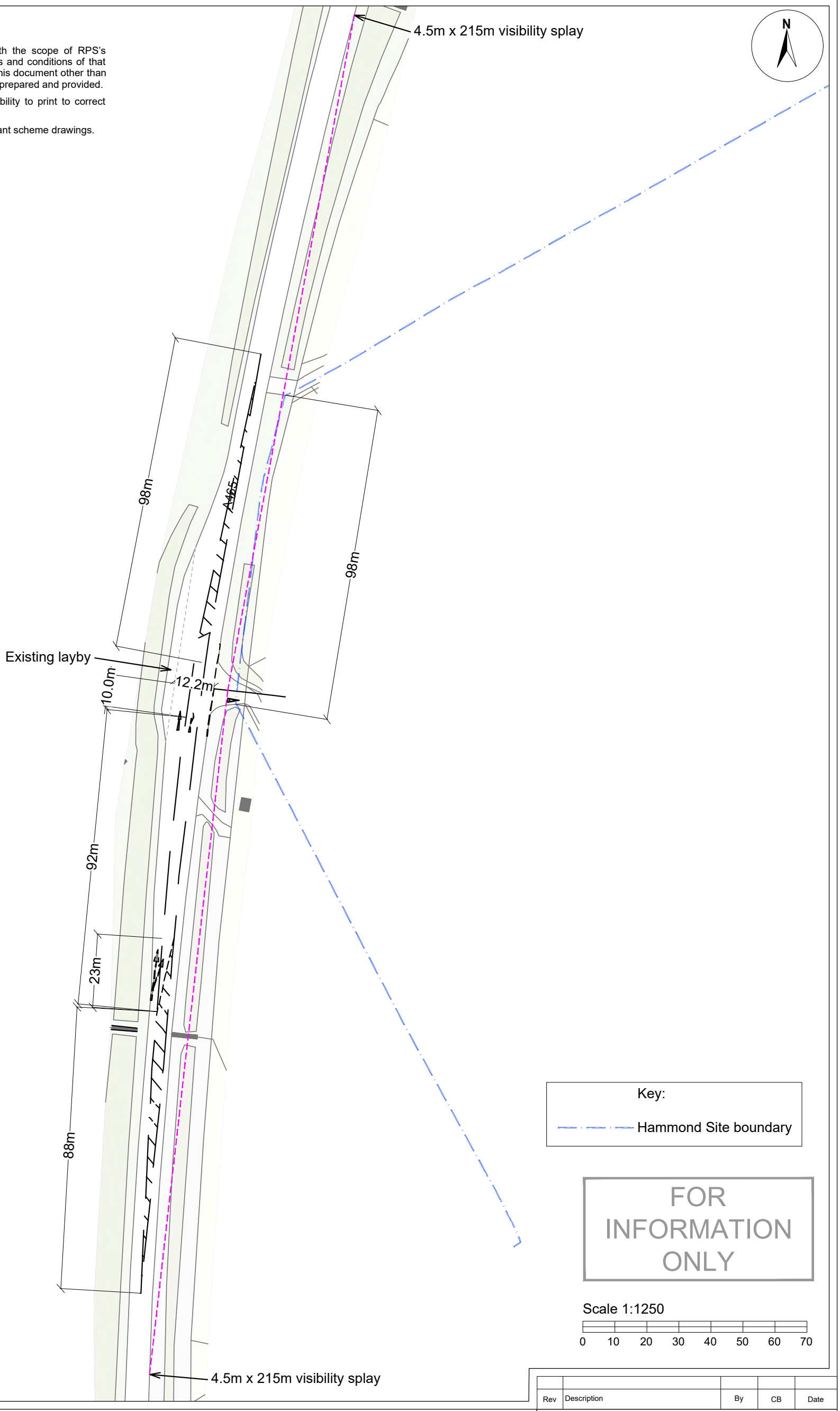
Ordnance Survey © Crown Copyright 2019. All rights reserved. Licence number 100022432

Appendix 2 – Site Proposed Access Arrangement Sketch

© 2019 RPS Group

NOTES

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. This drawing is to be read in conjunction with all relevant scheme drawings.



Rev	Description	By	CB	Date

MAKING COMPLEX EASY
A TETRA TECH COMPANY

20 Farringdon Street, London EC4A 4AB
T: +44(0)20 3691 0500 **E:** transport@rpsgroup.com

Client -

Project Abergavenny

Title Proposed Access to Hammond Site

Status	Drawn By	PM/Checked by
PRELIMINARY	AJ	MSB
Project Number	**Scale @ A3**	**Date Created**
JNY11641	1:1250	27/04/2023

RPS Drawing/Figure Number
JNY11641-RPS-0100-005

Rev
-

rpsgroup.com

Drawing Ref: P:\JNY11641 - Abergavenny\Drawings\JNY11641-RPS-0100-005.dwg

Appendix 4

High Level Drainage Strategy

ABERGAVENNY: INITIAL DRIANAGE CALCULATIONS

Date: 27 March 2024
From: [redacted]
Pages: 15 inc. this page
Regarding: Land east of A465, Abergavenny

6-7 Lovers Walk
Brighton, East Sussex BN1 6AH
T +44 1273 546 800

Dear Sirs,

RPS Consulting Services Ltd (RPS) were commissioned to provide flood risk support for the proposed residential led development to be located at Land east of A4646, Abergavenny, Wales. The proposed site is situated across an approximately 63-hectare parcel of land.

This technical note aims to provide details of the potential flood risk at the site and determine anticipated drainage requirements. The below is to be used to inform the Green Infrastructure Plan which is being developed by RPS and supporting consultants.

Site Background

Site Description

The site is located to the east of the A4645 in Abergavenny, Wales at Grid Reference SO 30829 13783 and is irregular in shape. The site is currently 100% soft landscaping formed of agricultural fields. Potential vehicular access points are indicated to be to the A4645 to the west of the site and to the northeast via an existing farm track which connects to the B4233. Abergavenny train station is adjacent west of the site.

A site location plan is included in Appendix A. The proposed site boundary includes both the red and blue outlines.

Topography

No Topographical survey is available for the site. As such LiDAR data (1m resolution, dated 2006) has been used to establish the topography at the site. The site slopes in a westerly direction, the highest elevations in the east are approximately 159m AOD, with the lowest elevations along the western boundary reaching approximately 77m AOD. The access track in the northeast is highest in the northeast at 148m AOD to 122m AOD where it meets the main site boundary. The LiDAR identifies numerous drains in the centre and north running in a westerly direction in the centre, shown by the lower elevations. A drain is also present in LiDAR in the southwest of the site.

A LiDAR map for the site is included in Appendix B. It should be noted that LiDAR data has an error margin of +/- 150 mm.

Geology

British Geological Survey (BGS) online mapping (1:50,000 scale) indicates that the site is located on superficial deposits of Till Devensian formed of Diamicton across the majority of the site. The south is situated on Glaciofluvial Deposits, Devensian formed of sand and gravel. The bedrock geology across the site is St Maughans Formation formed of argillaceous rocks and sandstone, interbedded.

BGS mapping identifies the bedrock geology and superficial deposits are classified as having ‘medium vulnerability, secondary aquifer’ in the west, with the east classified as ‘high vulnerability, secondary aquifer.’

Numerous boreholes are located within a 10m radius to the west of the site. No water was struck in any of the records. The deepest of these records; SO31SW11, was advanced 7.62m below ground level (bgl).

According to Natural Resources Wales the site is not located in a Source Protection Zone.

Flood Risk

Watercourses

A number of small watercourses are identified with the site boundary. These are illustrated on Figure 1. The map is also included in Appendix C.

In the centre two watercourses traverse the centre of the site before converging into one drain and continuing in a westerly direction. This watercourse eventually discharges into the River Usk approximately 450m west of the site. A small watercourse/drain flows through the north of the site, with a watercourse/drain running along the southwest. These watercourses are also hydraulically connected to the River Usk.

Culverted sections of the watercourse run to the wets of the site boundary through a residential area of land.

Date: 27th March 2024
Regarding: Abergavenny

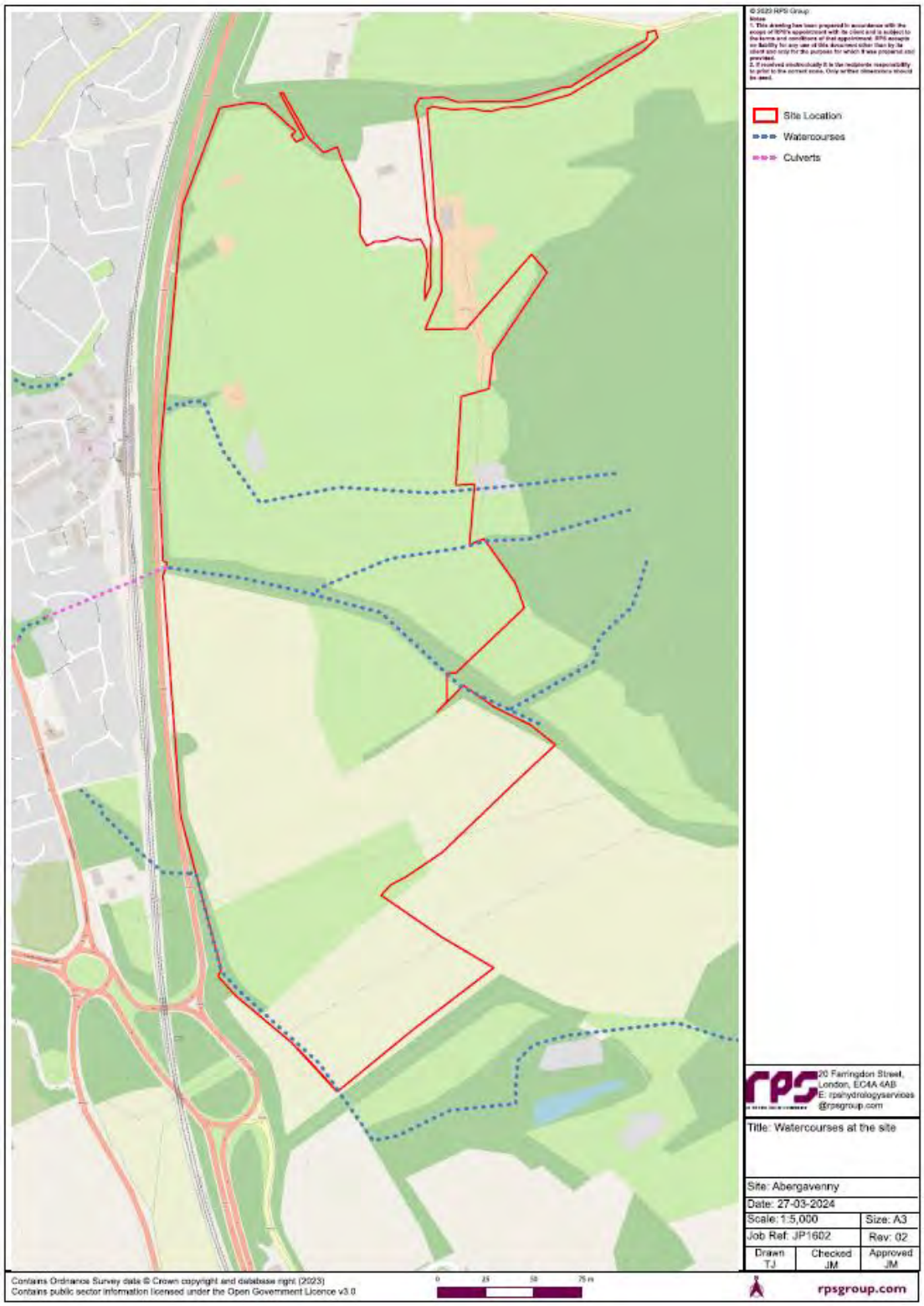


Figure 1. Watercourses on site and in proximity

Date: 27th March 2024
Regarding: Abergavenny

River and Coastal/Tidal Risk

According to the NRW Development Advice Map the site is located in Zone A, land assessed as having little or no risk of fluvial or coastal/tidal flooding.

The Flood Map for Planning has no official status until the adoption of the new TAN15 (anticipated in 2024), however, given the time likely to elapse between this report and submission of any planning application it has been assessed. In accordance with the NRW Flood Zone Mapping the site is situated in Flood Zone 1, the site is assessed as having a less than 1 in 1000-year chance of river and coastal/tidal flooding in any given year (0.1% Annual Exceedance Probability (AEP)) including an allowance for climate change.

Historical flooding has occurred from the River Usk in 1979 which impacted Abergavenny. The historical flood extended approximately 330m west of the site. No historical flooding has been identified at the site according to NRW.

The risk from rivers and coastal/tidal risk is **low.**

Surface Water and Small Watercourses

According to NRW National Flood Hazard and Risk Maps most of the site is at a very low risk of flooding from surface water and small watercourses. Isolated areas of the site are at a low to high risk. There is an area of risk associated with a small watercourse in the north of the site. Isolated areas of low to high risk are also present in the west associated with topographical depressions.

The risk categories pertain to the following probabilities of flooding:

- Low Risk – Land assessed as having a less than 1 in 1000-year risk of flooding (0.1% AEP);
- Medium Risk - Land assessed as having a less than 1 in 100-year risk of flooding (1% AEP); and,
- High Risk – Land assessed as having a less than 1 in 30-year risk of flooding (3.3% AEP).

Velocities during a low-risk scenario are less than 1m/s, flows are in a westerly direction towards the lowest elevations at the site.

The updated Flood Map for Planning shows the extent of Flood Zone 2 and Flood Zone 3 largely matches that of the current areas of low to high risk. The small watercourse in the north is categorised as Flood Zone 2/3, along with the topographical depressions in the west. The risk categories pertain to the following probabilities of flooding:

- Flood Zone 1 - Areas with a 1 in 1000 to 1 in 100 chances of flooding from surface water and/or small watercourses in a given year (0.1% to 1%), including the effects of climate change;
- Flood Zone 2 - Areas with a 1 in 1000 to 1 in 100 chance of flooding from surface water and/or small watercourses in a given year (0.1% to 1%), including the effects of climate change; and,
- Flood Zone 3 - Areas with more than a 1 in 100 chance of flooding from the sea in a given year (1% AEP), including the effects of climate change.

As mentioned, there are a number of small watercourses/drains present at the site, which may pose a risk to the site.

The risk is isolated and confined to small areas of the site. As such the overall risk is deemed **low**.

Date: 27th March 2024
Regarding: Abergavenny

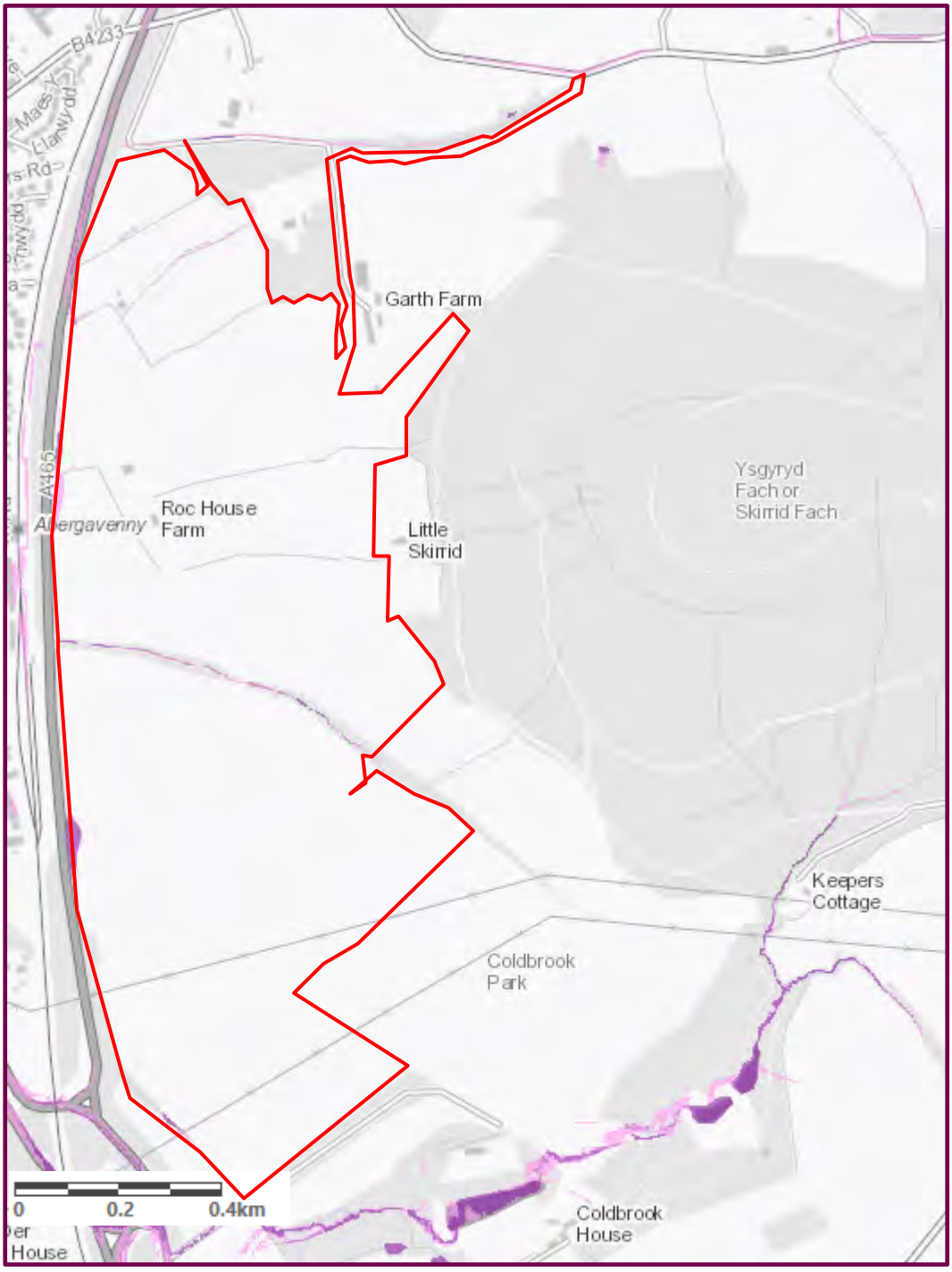


Figure 2. Risk from Surface Water and Small Watercourses Extent

Groundwater

This can occur in low-lying areas when groundwater levels rise above surface levels, or within underground structures. BGS mapping indicates that the site is underlain by Till Devasian and Glaciofluvial Deposits.

The underlying strata is considered to be permeable, therefore, the site is partially susceptible to groundwater flooding. However, no groundwater was encountered in any of the borehole records near to the site.

The overall risk is considered **low.**

Other Sources

There is a limited risk of flooding occurring as a result of a break in a water main. No water mains are likely at the site given its rural nature. No reservoirs, canals and other artificial structures are identified at or in proximity to the site.

The overall risk is considered **low.**

Proposed Development

The site is to be developed for residential use, the density and layout is not finalised at this stage.

As such we have made assumptions regarding the layout and anticipated impermeable area to provide some initial calculations for attenuation storage.

The site has been split into four primary catchments. The catchments all fall to the west, and have been split based on the watercourses on site. The catchments and anticipated flow directions based on topography are presented in Figure 3 below.

The north is proposed for residential use, with a transport hub likely to be incorporated in to plans to connect the site to Abergavenny train station. Based on initial design it is estimated that 40% of this area will comprise impermeable area. The south is to comprise of residential use, with a school potentially proposed in the east. Based on initial design it is estimated that 40% of this area will comprise impermeable area.

Urban creep of 8% has been applied to the residential areas as the anticipated density of homes is to be greater than 30dp per ha. The anticipated impermeable areas are shown in Table 1.

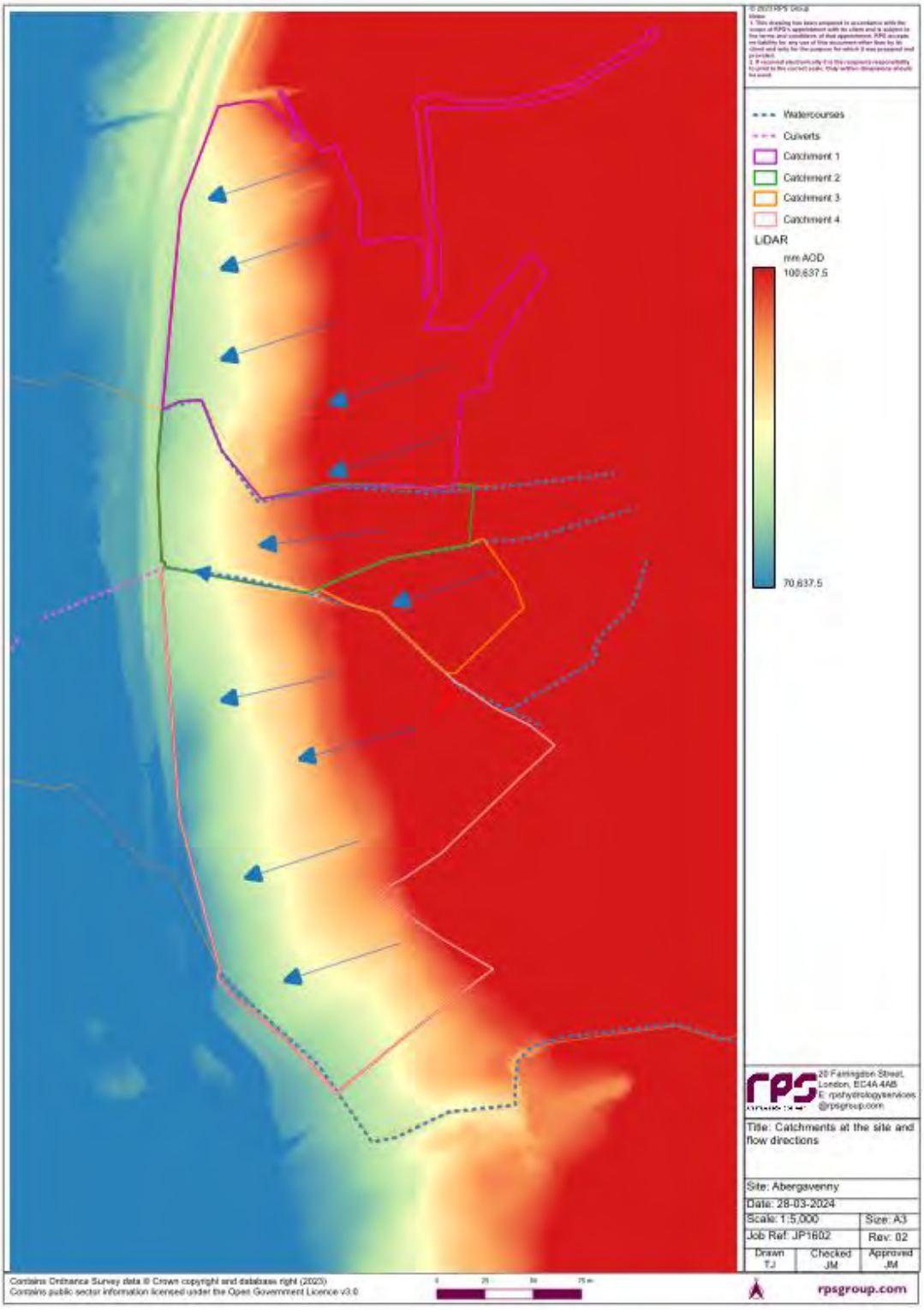


Figure 3. Catchments and Flow Directions at the site

Date: 27th March 2024
Regarding: Abergavenny

Table 1. Impermeable Areas

Ref.	Catchment	Use	Site Area (Ha)	Imp. Area %	Imp. Area (Ha)	Urban Creep (%)	Total Imp. Area (ha)
1	North	Residential	22.24	40.00	8.90	8.00	9.61
2	Middle	Residential	7.33	40.00	2.93	8.00	3.17
		Transport Hub	0.24	100.00	0.24	0.00	0.24
3	East	Residential	3.45	40.00	1.38	8.00	1.49
4	South	Residential	29.31	40.00	11.72	8.00	12.66
	TOTALS		62.57		25.17		27.17

SURFACE WATER DRAINAGE

Climate Change

Generally, residential development is considered to have a design life of 100 years. Climate change allowances in accordance with Welsh FCA guidance[1] indicates that both the central and upper estimates should be assessed to understand the range of impact. In the absence of data beyond 2115 the site will be conservatively assessed in line with the Upper Estimate for the 2080s. Therefore a 40% should be used.

Table 2. Change to extreme rainfall intensity (compared to a 1961-90 baseline)

Applies across all of Wales	Total potential change anticipated for 2020s (2015-2039)	Total potential change anticipated for 2050s (2040-2069)	Total potential change anticipated for 2080s (2070- 2115)
Upper estimate	10%	20%	40%
Central estimate	5%	10%	20%

Attenuation Required

The attenuation required for each catchment; north and south has been calculated based on 10% storage on plot, and 0.05% of storage in the pipe network. Rainfall depth is calculated based on a national assumption.

Based on this we have calculated the conservative area of land required, see Table 3.

Maps of the drainage constraints and proposed SuDS features are presented in Appendix C.

[1] https://www.gov.wales/sites/default/files/publications/2021-09/climate-change-allowances-and-flood-consequence-assessments_0.pdf

Table 3. Land required for storage

Ref.	Catchment	Volume required (m^3)	Land required for storage (m^2)
1	North	8,647	14,700
2	Middle	3,066	5,212
3	East	1,341	2,280
4	South	11,396	19,373
TOTAL		24,450	41,565

Consideration of the Drainage Hierarchy

1. Infiltration;
2. To a surface water body;
3. To a surface water sewer, highway drain or another drainage system; or
4. To a combined sewer.

The drainage hierarchy has been considered as follows.

Re-Use

Where possible water re-use should be considered at the site. Rainwater re-use can save water, not only reducing floods by reducing runoff but also by reducing soil erosion and providing water during droughts.

Greywater harvesting from showers, baths and sinks can be reused and feedback into the property for non-potable use where possible such as for flushing toilets.

Infiltration

Reference to BGS mapping indicates that the site is underlain by a bedrock of Till Devasian and Glaciofluvial Deposits. These are likely to have some permeability capacity. As such it is recommended that infiltration testing be obtained for the site at a later stage to identify the exact infiltration rates.

To a Surface Water Body

Catchment 1

A watercourse runs in a westerly direction to the south of Catchment 1. This watercourse is hydraulically connected to the River Usk and would therefore, be the favourable connection.

Catchment 2

A watercourse is present along the northern and southern boundaries of the catchment. The northern watercourse connection is at a lower elevation and therefore is favoured. This watercourse is hydraulically connected to the River Usk.

Catchment 3

A watercourse bounds the northwest and connects to the southern watercourse. This watercourse is hydraulically connected to the River Usk.

Catchment 4

A watercourse is present along the south and runs along the south west boundary. Connection to this watercourse in the centre is possible. This watercourse is hydraulically connected to the River Usk.

It is demonstrated that each of the catchments can connect to on-site watercourses.

To a Surface Water Sewer

Surface Water sewers are likely to be present along the A4645 and wider residential area. In line with the drainage hierarchy connection to a surface water sewer should only be considered if the above methods of discharge are evidenced as unviable.

Consideration of Sustainable Drainage Systems

Swales, Detention Basins and Ponds

Given the proposed development type and constraints the best appropriate approach is to construct attenuation basins and swales. Swales can be placed between development plots in an easterly to westerly direction to direct flows to the west. In the west a series of attenuation basins will be proposed which will eventually either discharge via infiltration or be connected to a watercourse.

As identified the estimated land storage for these SuDS features will be a area of 41,565m^2 (4.1ha). The estimated volume to attenuation is 24,450 m^3.

Filtration Strips

Where required filtration strips should be proposed along the entrance roads to the site, where traffic movements are higher. This will ensure that an extra level of treatment is provided for the water flowing off this proportion of the road. The access road to the northeast should comprise of loose gravel where possible. If tarmacking or similar hardstanding is used, then surface water runoff flows will need to be directed to the main site boundary,

Filter strips can also be placed surrounding the transport hub to reduce pollution.

Filter strip can be integrated into the surrounding land use adjacent to the footpaths and tracks and will be placed within grass areas. Local wild grass and flowers can be introduced to provide additional visual amenity to the area.

Rainwater Harvesting

Rainwater harvesting can provide water for non-potable uses such as irrigation or toilet flushing. It is recommended that rainwater harvesting systems such as rainwater butts and bio-retention areas such as rain gardens are provided within private garden areas of the proposed development to attenuate small quantities of roof water for re-use within garden areas.

It is noted that the attenuation benefits provided using rainwater harvesting are considered to be limited and would only be realised when the tanks were not full.

Green Roofs

Since the development is proposing residential houses with pitched roofs, it is likely that incorporating green roofs as part of the drainage strategy is not feasible.

Permeable Paving

Permeable paving can be an efficient means of managing surface water close to its source.

Given that permeable paving has a lower load bearing then traditional paving it is recommended to incorporate it into residential driveways.

Date: 27th March 2024
Regarding: Abergavenny

Permeable paving will provide a two-stage level of water treatment to help treat water and reduce pollution to an acceptable level.

We trust the above is satisfactory to meet your current design requirements specific to surface water drainage. Please note the design is Conceptual and subject to change as the design evolves.

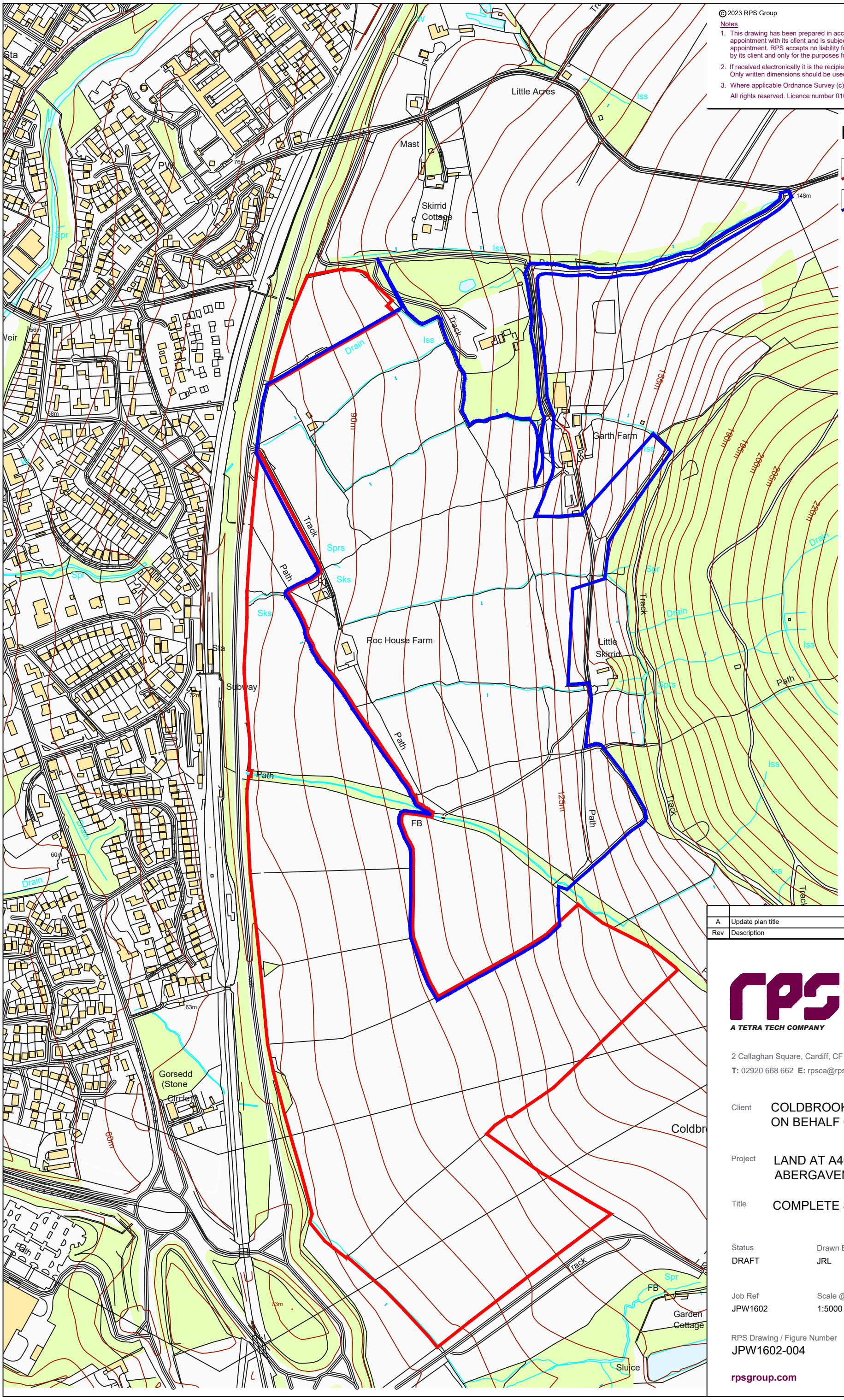
Yours sincerely,



Date: 27th March 2024
Regarding: Abergavenny

APPENDICES

A.1 Site Plan



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

- RED LINE BOUNDARY
- CS0213 BOUNDARY

Rev	Description	By	CB	Date
A	Update plan title	PO	DP	20/01/23

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: COMPLETE SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	JRL	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	JAN-2023

RPS Drawing / Figure Number: JPW1602-004

Rev: A

rpsgroup.com

W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

A.2 LiDAR Map

© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purpose for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Site Location

LiDAR

mm AOD

100,637.5

70,637.5

Contains Ordnance Survey data © Crown copyright and database right (2023)
Contains public sector information licensed under the Open Government Licence v3.0

0 25 50 75 m

N

20 Farringdon Street,
London, EC4A 4AB
E: rpshydrologyservices@rpsgroup.com

Title: Elevation at the site

Site: Abergavenny

Date: 27-03-2024

Scale: 1:5,000	Size: A3
Job Ref: JP1602	Rev: 02

Drawn	Checked	Approved
TJ	JM	JM

rpsgroup.com

A.3 Watercourses on Site

© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purpose for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Site Location

Watercourses

Culverts

20 Farringdon Street,
London, EC4A 4AB
E: rpshydrologyservices
@rpsgroup.com

Title: Watercourses at the site

Site: Abergavenny

Date: 27-03-2024

Scale: 1:5,000 | Size: A3

Job Ref: JP1602 | Rev: 02

Drawn	Checked	Approved
TJ	JM	JM

Contains Ordnance Survey data © Crown copyright and database right (2023)
Contains public sector information licensed under the Open Government Licence v3.0

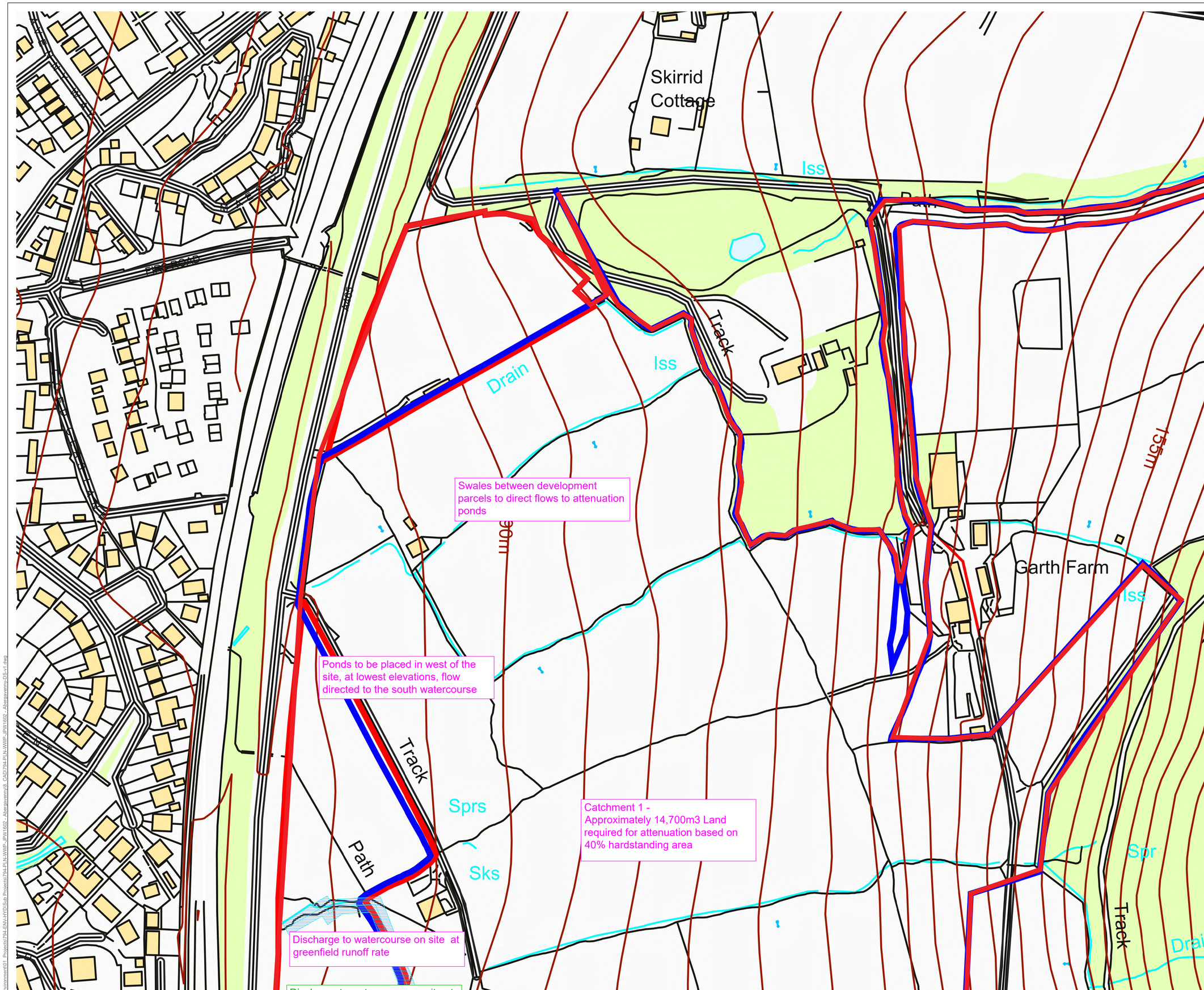
0 25 50 75 m

N

rpsgroup.com

Date: 27th March 2024
Regarding: Abergavenny

A.4 Drainage Constraints



O:\Environment\01 Projects\794-ENV-HYDIS\4 Projects\794-PLN-NWP_JPW1602 - Abergavenny\8 CAD\794-PLN-NWP_JPW1602 - Abergavenny-DS-v1.dwg

Sprs

Path

Sks

Catchment 1 -
Approximately 14,700m3 Land required for attenuation based on 40% hardstanding area

Discharge to watercourse on site at greenfield runoff rate

Discharge to watercourse on site at greenfield runoff rate

Roc House Farm

5m development buffer from watercourse

Swales between development parcels to direct flows to attenuation ponds

Catchment 2 -
5,212m3 Land required for attenuation based on 40% hardstanding area

5m development buffer from ordinary watercourse/ drain

Path

A pond to be placed in west of the site, at lowest elevations, flow directed to the south watercourse

Catchment 3
2,280m3 Lan
for attenuatio
40% hardsta
within the ca

FB

O:\Environment\01 - Projects\3794-ENV-HYD\Sub Projects\3794-PLN-WWP-JPW1602 - Abergavenny\8. CAD\3794-PLN-WWP-JPW1602 - Abergavenny.DS-v1.dwg

Skirrid

5m development buffer from watercourse

Sprs

Catchment 2 - 5,212m3 Land required for attenuation based on 40% hardstanding area

5m development buffer from ordinary watercourse/ drain

A pond to be placed in west of the site, at lowest elevations, flow directed to the south watercourse

Catchment 3- 2,280m3 Land required for attenuation based on 40% hardstanding area within the catchment

Track

FB

Swales between development parcels to direct flows to attenuation ponds

8m development buffer from main watercourse

'3m3 Land

O:\Environment\01 - Projects\794-ENV-HYD\Sub Projects\794-PLN-WWP_JPW1602 - Abergavenny\8. CAD\794-PLN-WWP-JPW1602 - Abergavenny-DS-v1.dwg

within the catchment

FB

Swales between development parcels to direct flows to attenuation ponds

8m development buffer from main watercourse

Catchment 4-
Approximately 19,373m2 Land required for attenuation based on 40% hardstanding area

Ponds to be placed in west of the site, at lowest elevations, flow directed to the central watercourse

Swales to be placed between development plots to direct flows to attenuation ponds

A499

63m

Gorsedd (Stone Circle)

BONMOUTH ROAD

Discharge to watercourse on site at greenfield runoff rate

8m development buffer from main watercourse

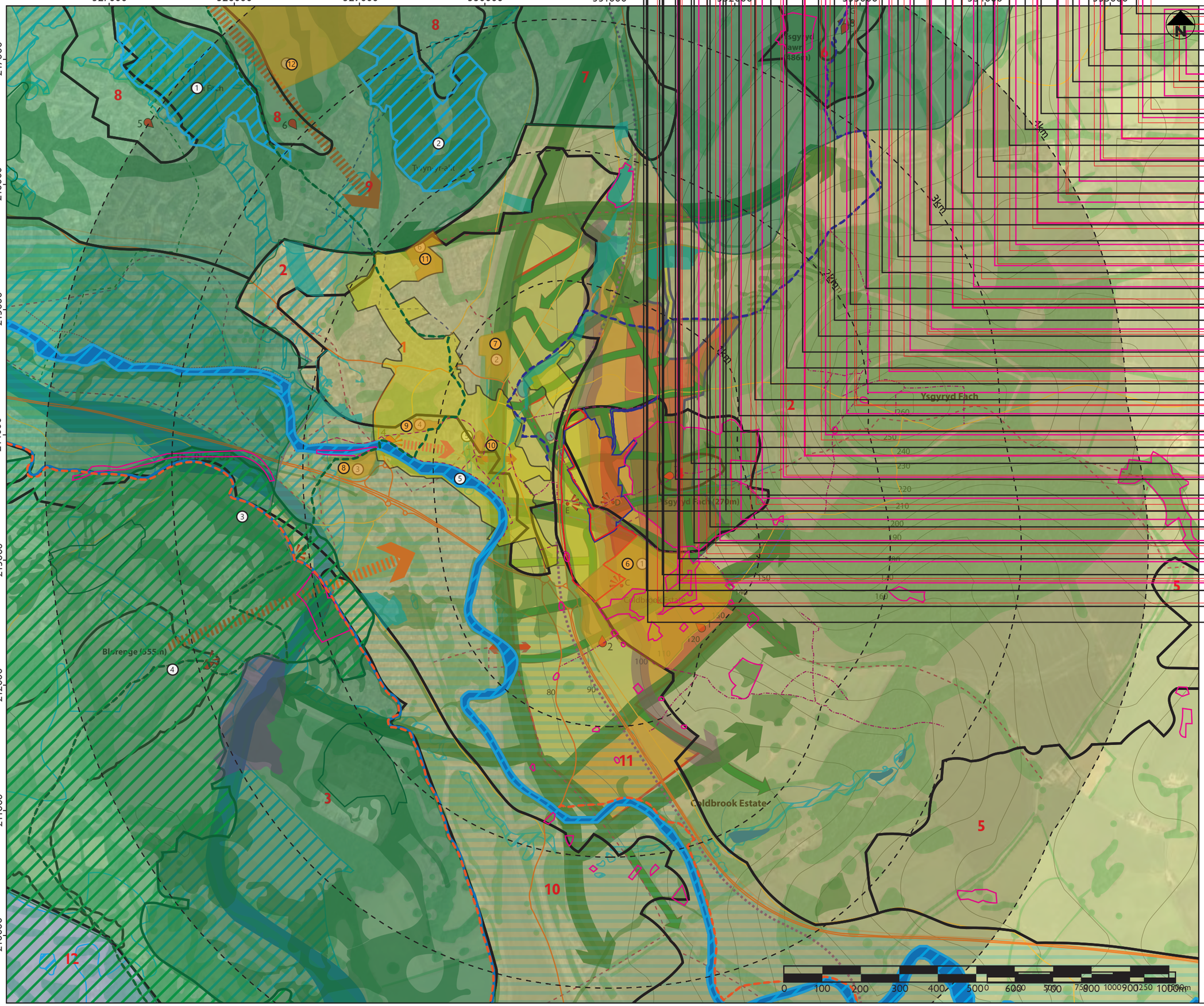
Col

rack

O:\Environment\01 Projects\794-ENV-HYD\Sub Projects\794-PLN-WWP-JPW1602 - Abergavenny\8 CAD\794-PLN-WWP-JPW1602 - Abergavenny-DS-v1.dwg

Appendix 5

Green Infrastructure Strategy and Statement



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- ~~Incremental 1km buffer from site boundary~~
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

~~Statuory Designations~~

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- ~~National parks - Bannau Brycheiniog and Black~~ Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

~~Statuory Biodiversity Designations~~

1. ~~Sugar Loaf Woodlands (Deri-fach Woodland)~~ ~~SAC&SSSI~~
2. ~~Sugar Loaf Woodlands (Deri-fach Woodland)~~ ~~SAC&SSSI~~
3. ~~Coed-y-person SSSI~~
4. ~~Blorenge/Blorenge SSSI~~
5. ~~River Usk/Afon Wysg SSSI/SAC~~

~~Historic parks & gardens~~

6. ~~Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).~~
7. ~~Bailey Park~~
8. ~~New Cemetary~~
9. ~~Linda Vista Gardens~~
10. ~~Abergavenny Castle~~
11. ~~The Hill~~
12. ~~Abergavenny Priory Deer Park~~

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

Abergavenny East, Candidate Site

Green Infrastructure Statement

2nd May 2024

Overview

As part of the development process, the existing Green Infrastructure (GI) asset has been assessed through landscape desktop survey, and the context of the site, in its wider GI network, and within the policy framework in Wales and Torfaen. Consideration of habitats and ecological features within the red-line boundary (Coldbrook Estate land) has been informed by a Preliminary Ecological Appraisal (PEA)[1], with a desktop ecology survey conducted for the remaining parts of the Candidate site outside the red line. The following statement reports on the iterative GI process and how, based on national and local policy, positive contributions can be achieved by the proposed candidate site, if developed.

Introduction

The term *'Green Infrastructure'* first came to prominence in the early 2000's most notably in the Landscape Institute Position Statement *'Green Infrastructure An integrated approach to landuse' (2009).* This document defined Green Infrastructure as;

> *'The network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. It is a natural, service-providing infrastructure that is often more cost effective, more resilient and more capable of meeting social, environmental and economic objectives than 'grey' infrastructure.'*
>
> GI Functions are described as the:
> *'roles that assets can play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystems services. They may have obvious primary functions, but each asset can perform different functions simultaneously – 'multifunctionality.'*

The natural environment between and within towns and cities, including greenspace, vegetation and water. Provision of GI offers a multitude of ecosystem services (i.e. the benefits that people derive from nature) and forms part of a sustainable approach to the management of natural resources. New infrastructure should seek to strengthen and reinforce existing assets within a site and it should be planned and designed to be beneficially multi-functional.

[1] Soltys Brewster Ecology. 2023. *Land East Of Abergavenny. Preliminary Ecological Appraisal.* Document Ref: E2315301/Doc 01, Dated 30 March 2023.

Principal Targets of GI.

The principal multifunctional targeted benefits of GI are to:

1. Protect and enhance biodiversity and the resilience of ecosystems and their connectivity;
2. Consider Opportunities for habitat protection, restoration, creation and management in the provision of GI;
3. Contribute to improved mental health with more direct contact with nature, the seasons and natural processes;
4. Identify opportunities where existing and potential green infrastructure could be improved and enhanced as part of placemaking;
5. Provide opportunities for improved physical health and wellbeing through recreational access, community permeability and connectivity;
6. Enhance place-making identity and sense of community ownership;
7. Improve townscape and landscape quality and visual amenity;
8. Integrate play and recreation in GI networks;
9. Improve micro-climate (summer cooling/winter shelter);
10. Mitigate and adapt to the impacts of climate changes improving of;
    - Oxygen production.
    - Carbon sequestration (locking carbon in vegetation and soils).
    - Water sequestration (vegetation evapotranspiration and formal attenuations).
    - Improve air and water quality.
    - Reduce flood risk.
    - Provide alternative transportation opportunities (cycling/walking/public transport links).

Green/Blue Infrastructure (GI) is the term adopted in this document to incorporate the now more fully developed drainage requirements for developments under SABs, (Sustainable Drainage Approval Body) in Wales, along with other GI elements including all the features of

Policy & Guidance

Planning Policy Wales 2024 (12th Edition)

<u>6.2 Green Infrastructure</u>

"Green infrastructure plays a fundamental role in shaping places and our sense of well-being, and are intrinsic to the quality of the spaces we live, work and play in. The planning system should protect and enhance green infrastructure assets and networks because of these multi-functional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision alongside the need to meet society's wider social and economic objectives and the needs of local communities. The multiple benefits that resilient ecosystems and green infrastructure offer to society, including the economic and social contribution they make to local areas, should be taken into account when balancing and improving these needs."

"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, helping to overcome the potential for conflicting objectives, and contributing towards health and well-being outcomes."

Future Wales: The National Plan 2040

Policy 9 – Resilient Ecological Networks and Green Infrastructure

"To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."

> "As part of a green infrastructure assessment, broad opportunities for habitat protection, restoration or creation and the provision of green infrastructure may be specified as part of identifying areas to be safeguarded or may take the form of more specific allocations. This may be achieved, for example, through the provision of buffer areas around protected sites or stepping stones connecting habitats or through the identification of green infrastructure in and around urban areas."

Local GI Policy & Guidance: Monmouthshire CC

Green Infrastructure SPG April 2015

- Provides a Evidence Base
- Identifies The Councils GI Approach
- Provides as structure for Embedding GI into Development
- Identifies Potential GI Requirements for Key Growth Areas

For the Abergavenny area the SPG identifies the following.

'Abergavenny is a distinctive historic market town nestled within the Usk Valley, immediately outside the Brecon Beacons National Park's eastern boundary. Its town centre is a conservation area containing many listed buildings, including the ruins of the Norman Abergavenny Castle. Together with the nearby village of Llanfoist, it is overlooked and sheltered by the Blorenge and the Sugar Loaf mountains, located to the south-west and north-west respectively. The Blaenavon World Heritage Site stretches to the south-west. Other key GI assets include:

- *The River Usk (also a SAC) and its floodplain (to the south of Abergavenny), which includes accessible natural greenspaces such as Castle Meadows.*
- *The River Gavenny which flows through Abergavenny and the Monmouthshire and Brecon Canal situated to the south of Llanfoist.*
- *Historic parks/gardens including Bailey Park within Abergavenny, Abergavenny Priory Deer Park to the north and Coldbrook House to the south-east.*
- *Public Rights of Way and the Usk Valley Walk long distance path.*
- *Partly accessible woodlands such as Twyn-yr-allt and Deri-fach (also designated as SSSI and SAC) to the north and Coed-y-person to the south (designated as a SSSI)'*

Appendix C of the document provides a Green Space assessment of Abergavenny, with a high level Landscape Sensitivity and Capacity Study, including high level Landscape Capacity for Housing. These identify a primary Green Infrastructure corridor along the southern site boundary vegetation, along the railway line and A465 road. This strategic assessment information has informed our desktop baseline and has been incorporated into our more detailed site assessment.

In addition, a review of the Ecological Connectivity Assessment (2010) produced as part of the current (adopted) LDP has been undertaken. The relevant map from the 2010 identifies the vegetation corridor along the A465 to the west of the Candidate Site and some of the adjacent hedgerow corridors as providing existing ecological connectivity.

Candidate Site GI Process

As part of the candidate site process, the existing Landscape, Visual and Green Infrastructure (GI) asset has been assessed through Landscape desktop survey and Ecological desktop and site survey (red-line Coldbrook Estate Land only), and the context of the site, in its wider GI network, considered. These assessments are illustrated and reported in the following document(s);

- 2488601-SBC-XX-ZZ-DR-L-001, Landscape Character Areas
- 2488601-SBC-XX-ZZ-DR-L-002, Visual Constraints & Opportunities
- 2488601-SBC-XX-ZZ-DR-L-003 -005, Viewpoint Photography
- 2488601-SBC-XX-ZZ-DR-L-006, Green Infrastructure Strategy
- 2488601-SBC R01 Landscape and Visual Appraisal Statement
- Preliminary Ecological Appraisal (PEA), Dated 30 March 2023

Summary of Ecological Features and Habitats (Red Line area)

As illustrated on the Phase I Habitat map, the majority of the land within the red-line boundary comprises of improved agricultural grassland or arable fields which would be considered of low ecological value. The field parcels are separated by a network of native hedgerows and small areas of woodland, with ditches or streams associated with several of these habitat corridors. A summary of the habitat types and their extent within the red line is shown in Table 1.

Table 1 Extent of Habitats within & immediately adjacent to Red Line

Habitat Type	Habitat Area (ha.) or Length (Linear M)
Improved Grassland or Arable Land (F1-F8)	27.95ha.
Woodland (within or immediately adjacent)	3.53ha
Watercourses (Streams (S) & Ditches (D)). Typically along hedgerow corridors	Streams – 937m Ditches – 805.25m
Intact Species-rich hedgerows	206.3m
Intact species-poor hedgerows	1252.1m
Defunct species-poor hedgerows	234.7m
Species-rich hedgerow with trees	900.5m
Species-poor hedgerow with trees	472.5m

The dominance of habitats of low ecological value lends itself to the Stepwise Approach set out in PPW with development focused on these areas allowing retention and enhancement or more valued ecological features and habitats. On a site wide basis, providing development at this location would also contribute to 'avoiding' development pressure on other sites to meet LDP housing needs.

The Green Infrastructure Strategy, illustrates the culmination of this strategic assessment process and the existing GI Context, and potential development site multifunctional GI connections, to enhance and contribute to the wider GI network. As part of the candidate site assessment process the context and enhancement of the existing GI has been an integral consideration.

GI Context & Connectivity

The stepwise approach (PPW 12) has been implemented. A summary of the stepwise approach is as followed-

1. **Avoid**

   To avoid damage to biodiversity and ecosystem functioning.

2. **Minimise**

   Alternative sites that would result in less harm, no harm or gain are to be fully considered to minimise the any harmful environment effects.

3. **Mitigate/Restore**

   '...ensure that features and elements of biodiversity or green infrastructure value are retained on site, and enhanced or created where ever possible.'

4. **Compensate on site**

   Onsite compensation must be sought when all other options have been exhausted.

5. **Compensate off site**

   Offsite compensation must be sought when all other options have been exhausted.

6. **Long Term Management**

   Long Term Management of retained and new GI assets to secure enhancement.

Summary of Effects, Mitigation & Enhancement

The stepwise approach has been applied to the proposed scheme, within the LDP stage framework masterplanning GI led process.

Step 1&2: **Avoid/Minimises**

As indicated above, the majority of the habitats within the red line boundary would be considered of low ecological value – locating development in these areas would avoid/minimise impacts on the primary GI network as part of the candidate site development approach.

Step 3&4: **Mitigate/Restore & Compensate (onsite)**

The site has the potential to Mitigate, Restore and Compensate for the necessary loss of GI components within the site including the enhancement of existing north-south and east-west GI corridors. Supplementary planting to mitigate for any loss of the existing quantum of hedgerow or woodland habitats (as summarised in Table 1) would aim to provide increased coverage of these species as part of the GI network to achieve a demonstratable gain for biodiversity.

Step 5: **Compensate (offsite)**

Off-site compensation is not anticipated to be necessary, subject to detailed masterplan development.

Step 6: **Long Term Management**

An additional benefit which can result from development could be the opportunity for the long-term management of the retained and new GI assets to secure these enhancements and their value in the long term.

GI Conclusion

Key outcomes of the GI assessment identify that the site has the potential to accommodate development, particularly on the lower more visually contained slopes, which also correspond to habitats of low ecological value with remaining more sensitive land parcels having the capacity to accommodate GI mitigation and enhancements. An indicative visual buffer line illustrates the broad boundary between the most appropriate land for development and the less appropriate land for development, subject to detailed development masterplanning with consideration to the density, grain, and type of develop and incorporated GI corridors and buffering.

Appendix 6

Landscape and Visual Appraisal

(incl. Visual Opportunities and Constraints Plan, Annotated Viewpoints and Landscape Character Areas Plan)

ABERGAVENNY EAST CANDIDATE SITE

LANDSCAPE & VISUAL APPRAISAL STATEMENT (LVS)

April 2024

Intentionally blank

RPS

ABERGAVENNY EAST CANDIDATE SITE

LANDSCAPE & VISUAL APPRAISAL STATEMENT (LVS)

Document Ref: 2488601-SBC- R01

Issue	Revision	Stage	Date	Approved by
01	R01	-	11/04/24	[redacted]

Abergavenny East Candidate Site– Landscape and Visual Appraisal Statement (LVS)

1.0 Introduction and Approach.

1.1 Soltys Brewster Consulting were commissioned in March 2024 by RPS to produce a 'high level' landscape and visual appraisal relating to land to the east of the A465 at Abergavenny. The land is a Candidate Site for a residential development within the Monmouthshire Replacement LDP.

1.2 The following tasks were undertaken by a Chartered Landscape Architect (CMLI) in April 2024. A study area extending to 4km from the centre of the site was adopted.

a) A desk-based appraisal of the baseline landscape context, including the physical landscape, designations and landscape character (LANDMAP).

b) A site-based assessment to establish contextual views and site visibility.

c) Report compilation, providing a summary of the baseline landscape and visual context and resulting constraints and opportunities to be considered in masterplanning proposed development within the site.

1.3 *Green Infrastructure Supplementary Planning Guidance (Monmouthshire CC Adopted April 2015)* includes key findings from the *Landscape Sensitivity and Capacity Study (Main Settlement Summaries, 2010).* This identifies the site at a strategic level as having a high and high/medium sensitivity and a low capacity for housing development. This appraisal considers the capacity of the site for housing development at a more detailed level, in relation to the site topography, views and opportunity for buffering to maximise development capacity in an acceptable way.

2.0 Overview of Proposed Development.

2.1 Outline proposals for the site have been produced, illustrated on *'Land East of A465, Abergavenny – Concept Plan, (Pegasus Group P22-3191_DE_001_A_02).* The masterplan indicates:

- Residential development served by primary vehicular access from the A465T Road.
- A transport hub within the northern section of the site, adjacent to the A465T road.
- Public open space primarily to the south and east of the site. Indicative location of SuDs and play areas are included across the site along with proposed planting to supplement retained existing.

3.0 Landscape and Visual Context.

The Site

3.1 The site is located on agricultural land to the immediate south-east of Abergavenny, separated by transport corridors comprising the A465 road and the Newport to Hereford rail line. The land rises sharply from a low point to the south of the site at 75m AOD eastwards to a high point beyond the site boundary at Ysgyryd Fach at 270m AOD. The site contains a network of managed uniform hedges and taller field boundaries containing trees and unmanaged hedges. There are also a number of streams flowing east to west across the site, most notably including a well-vegetated corridor located centrally and accessed by an adjoining public footpath. The site is well-contained by woodland on the higher land at Ysgyryd Fach and also on lower-lying areas forming the site boundary. This includes roadside woodland and trees along the A465 to the east and woodland blocks within the Coldbrook Park Estate to the south and around Caederwen to the north.

The Study Area (4 km)

3.2 The site is contained between the settlement of Abergavenny and the local wooded landform of Ysgyryd Fach. To the west, flowing from north-west to south-east is the River Usk and beyond this rises the Blorenge. To the north of Abergavenny, the land rises to the Sugar Loaf. These uplands form distinctive and popular highpoints within the Banau Brycheiniog National Park. Further to the north-east, Ysgyryd Fawr/The Skirrid, another popular high point, forms the eastern edge to the BBNP. Beyond Ysgyryd Fach, to the east, the study area comprises a sparsely populated agricultural landscape of rolling irregular fields enclosed by managed hedges trees and woodland.

Landscape Designations and Background Planning Policy

3.3 A summary schedule of landscape designations that extend into the study area is provided in ***Appendix 1.***

3.4 The Grade II Registered Historic Park and Garden of Coldbrook Estate extends within the site boundary to the south. This statutory designation comprises a multi-layered small park and gardens dating from the medieval period to the early twentieth century, with areas of rolling pasture interspersed with mature woodland copses and individual trees. The main drive, lying just beyond the southern alignment of the site boundary is flanked by mature lime trees. Significant views from the house are acknowledged to the north to the wooded slopes of Ysgyryd Fach and to the south-east, across rolling farmland.

3.5 Within the wider study area, to the north and to the west at distances beyond 1.6 km, the Bannau Brycheiniog National Park (BBNP) extends broadly across upland areas, including the Blorenge, the Sugar Loaf and to the north-east, the Skirrid, (Ysgyryd Fawr). Panoramic views from these summits will extend across areas that may, in some cases, be outside the BBNP. There will be a statutory duty to ensure that development considers indirect effects on these views and the wider setting of the BBNP.

3.6 To the west of the study area, extending across the Blorenge, the Blaenavon UNESCO World Heritage Site together with the Blaenavon Registered Landscapes of Outstanding Historic Interest reflect the multi-layered industrial heritage of the area.

3.7 A Conservation Area extends across the historic town centre of Abergavenny to the west. This reflects the historic core town centre and its medieval core, focussed on the Castle and St Mary's Church and the distinctive medieval layout of roads and burgage plots.

3.8 The study area also contains promoted long-distance footpaths including the Cambrian Way, Beacons Way and the Usk Valley Walk. These provide popular tourist routes through the study area. Public footpaths also extend through the site, providing a popular route to the summit of Ysgyryd Fach.

Landscape Character/LANDMAP

3.9 ***Figure 1*** illustrates Landscape Character Areas (LCA's) that extend within the study area. ***Appendix 2*** provides a summary of the key characteristics and relative values of each LCA.

3.10 The site falls partially within ***LCA 4 Ysgyryd Fach,*** evaluated as high in value. This small LCA is strongly characterised by the wooded landform of Ysgyryd Fach. It forms a distinctive and attractive dome rising from the lower ground and is a visual focus and a backcloth to Abergavenny, Coldbrook Estate and the surrounding lower lying land of the Usk Valley. Below the wooded dome, the landscape is open pasture fields with managed hedges and occasional farmsteads.

3.11 Remaining areas of the site to the west and to the south fall within **LCA 2 Northern Hills.** This LCA extends across a broad tract of Monmouthshire to the east of the study area. It is evaluated as high value overall. It is a tranquil and gently rolling agricultural landscape of irregular fields enclosed by a rich tapestry of hedges, trees and woodlands.

3.12 Abutting the western edge of the site is the historic market town of Abergavenny, defined within LCA 1 Abergavenny. This urban area, evaluated as moderate value, has a distinctive historic core and a strong and positive relationship to the River Usk, (***LCA 11 Upper Usk Valley***). The Usk Valley extends along the southern edge of Abergavenny and comprises an attractive and open valley floor with a distinct sense of place and a high value. Surrounding hills, most notably including the Blorenge (***LCA 3 Blorenge***) and the Sugar Loaf (***LCA 8 Sugar Loaf***) and, more distantly to the north-east, the Skirrid (***LCA 6 Ysgyryd Fawr***) provide an important scenic backcloth to the Usk Valley and Abergavenny. These upland areas are popular tourist destinations and scenic landmarks that are outstanding in value with key sensitive characteristics relating to panoramic views, isolation, remoteness and historic/cultural identity.

Visual Appraisal/Viewpoints

3.13 A site visit was carried out in April 2024 and photographs recording views of the site from seven viewpoints within the study area are illustrated on Figures 3 to 5. A visual analysis is also presented on Figure 2 to assist with identifying site constraints and opportunities in relation to views and visibility.

3.14 The visual analysis identifies that:

- The site possesses a strong west facing aspect with a visual envelope likely to extend broadly across the Usk Valley as far as the enclosing hills of the BBNP. It will include parts of the Blorenge and, more distantly north-west and beyond the study area, the Sugar Loaf. **Viewpoint D Ysgyryd Fach** illustrates typical views west and north-west from higher parts of the site. **Viewpoint B Blorenge** is located on the upper edge of the Blorenge scarp and illustrates the extent of the strong intervisibility that the site shares with this summit. The entire site will be visible in views east in the middle distance beyond Abergavenny and the wooded A465 corridor.
- The site is visually enclosed by the wooded landform of Ysgyryd Fach and there will be no visibility of the site from the north and around to the east. Within panoramic views south from the Skirrid (Ysgyryd Fawr) for example, (**Viewpoint G The Skirrid**), the site, including the extent of the blue line access track to the north, is obscured behind woodland and landform.
- The site is visible within filtered and glimpsed views from the lower-lying undeveloped areas of the River Usk Valley and the east-facing valley sides. **Viewpoint F Cambrian Way/Castle Meadows, Abergavenny** illustrates typical views from the riverside. Beyond the scattered intervening mature trees and woodland, the distinctive wooded landform of Ysgyryd Fach forms an important green backcloth to the views east. Within the site, lower areas, (i.e. below around 100m AOD), however, are largely obscured by intervening trees. ***Viewpoint A Cambrian Way/Monmouthshire and Brecon Canal*** illustrates the view east from more elevated sections of the lower valley sides more to the west. Visibility of the lower sections of the site increases slightly although intervening vegetation, particularly along the A465 continues to filter and obscure these areas. Broadly above the 100m AOD level, the fields within the site are visible and contribute strongly to the attractive backdrop that Ysgyryd Fach provides within views east from the undeveloped sections of the Usk Valley floor.
- From developed areas within Abergavenny, there will be some localised glimpse views where built form allows. Within these views, the wooded summit and the upper fields within the site may be visible to varying degrees. Lower sections of the site will be obscured, particularly by the mature vegetation along the A465 corridor and elsewhere.
- Local views to the site will be constrained by vegetation. Along the A465, the boundary trees, hedges and woodland screens visibility across the site. To the north, there will be no visibility to the site from routes that will include minor roads and the Beacons Way, due to

a combination of topography and vegetation. From the south, views from the Coldbrook Estate, (RHPG), have been considered. **Viewpoint C Coldbrook Estate** illustrates views north from drive and approach to Coldbrook House. The southern extent of the site within the lower, nearest field within the site is clearly visible in the foreground of the view. Elsewhere local enclosure is provided by elevated land and trees in the foreground.

4.0 Master planning constraints and opportunities.

4.1 Section 3.0 provides a review of the landscape and visual context for the site within a 4.0km study area.

4.2 The key constraints that will require consideration in master planning of the site are summarised below:

Landscape Designations

- ***BBNP.*** Key characteristics that contribute to the special qualities of the BBNP will include long views from the summits of the Blorenge and Sugar Loaf. These views will be influenced by land-use changes that fall outside the National Park but contribute to the setting. The site shares close intervisibility with the Blorenge and to a lesser degree due to distance, the Sugar Loaf.

- ***Coldbrook Estate Historic Park and Garden.*** The boundary of this statutory designation extends partially within the site. It is likely that areas within the designation will be unacceptable for development. Areas beyond the designation that contribute to the setting of the estate will also need to be sensitively integrated, perhaps through incorporation of an appropriate buffer.
- ***Access and recreation.*** A number of public footpaths extend though the site including a popular route providing access to the summit of Ygyryd Fach. These will need to be integrated with the proposed development.

Landscape Character/LANDMAP

- ***Abergavenny (MNMTHVS072).*** The town possesses a positive relationship with the River Usk valley floor. Master planning within the site will need to ensure that expansion of the urban development to higher enclosing slopes of Ysgyryd Fach does not dilute this relationship.
- ***Blorenge BBNP LCA 15 Blorenge LANDMAP MRTHRVS840.*** A key characteristic is the strong sense of place reinforced by panoramic views. The site is visually prominent in views

east across the Usk Valley from the upper scarp slope and master planning will need to ensure proposed development is sensitively integrated with the grain of the site-based landscape/GI.

- ***Ysgyryd Fach (MNMTHVS013).*** This LCA/LANDMAP visual and sensory aspect area extends across a section of the site (blue line boundary) to the north. Key characteristics relating to its distinctive landform and undeveloped appearance that provide a backcloth to Abergavenny and to Coldbrook House and surrounding lower-lying land will need to be retained.

Visual/Views

- Ysgyryd Fach forms a important green backcloth to the undeveloped areas of the Usk Valley. Broadly above the 100m AOD level, the fields within the site are strong visual contributors to this backcloth and it is likely that development within these sections will be either unacceptable or visually constrained.
- As outlined above, views north from the drive and approach to Coldbrook Estate will need to be considered and development sensitively integrated through an appropriate visual buffer.

4.3 The key opportunities that the site offers in relation to master planning are summarised below:

- **Existing site Green Infrastructure (GI).** The site contains a rich tapestry of existing GI corridors, including wooded stream corridors, managed and unmanaged hedges and woodland. This provides a strong structure that could be reinforced to integrate proposed development with the landscape.
- **Visual buffers.** An opportunity exists to maximise the development potential of the site through provision of a strategic visual planted buffer broadly extending north to south through the site, following the 100m contour. Some development may be justified above the 100m contour with the added benefit of the planted buffer to assist with screening and integration. An additional visual buffer would also be justified to the south of the site to ensure sensitive integration with the setting of the Coldbrook Estate. Strengthening and reinforcing the existing hedgerows in this location with buffer planting would achieve this.
- **Visual connectivity to Abergavenny.** The lower sections of the site, (i.e. below 100 m AOD) are visually enclosed and will strategically appear well-connected to Abergavenny without diluting the positive relationship that the town possesses to the River Usk.

5.0 Conclusion

5.1 The LVS has considered the landscape and visual context for the site within a 4.0km study area. This identifies that areas of the lower site have potential and capacity to accommodate development within an appropriately designed GI structure, with sensitivity to the existing GI network. Lower slopes are relatively visually enclosed. An indicative visual buffer line illustrates the broad boundary between the most appropriate land for development and the less appropriate land for development, subject to detailed development masterplalnning, with consideration to the density, grain, and type of develop and incorporated GI buffering.

APPENDIX 1: LANDSCAPE DESIGNATIONS

Statutory Designations

Bannau Brycheiniog National Park (BBNP)	This designation extends across areas to the north and to the west of the study area within 1.6 km the site boundary at its closest. Special Qualities of the BBNP are: • *Sweeping grandeur & outstanding natural beauty.* • *Peace, tranquillity & darkness.* • *Contrasting patterns, colours and textures.* • *A sense of place & cultural identity.* • *Sounds, sights, smells & tastes.* • *Sense of discovery.* • *Mosaic of diversity.* • *Living landscape.* • *Enjoyable & accessible.* • *An intimate sense of community.*
Blaenavon World Heritage Site	Granted in 2000 by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as World Heritage Site (WHS), this designation is located approximately 1.6 km to the west of the proposed development site boundary. The designation is principally defined by the boundaries of land historically leased or purchased to provide the minerals, energy and infrastructure for the ironworks, and by additional land used in direct association with the ironworks or its communities.
Registered Historic Parks and Gardens	Coldbrook Historic Gardens and Parkland extends partially within the site boundary to south. This comprises a multi-layered small park and gardens dating from the medieval period to the early twentieth century, with areas of rolling pasture interspersed with mature woodland copses and individual trees. The main drive, lying just beyond the southern alignment of the site boundary is flanked by mature lime trees. The original manor House has been removed and replaced with a more house, set further to the north west although remaining features are largely retained. Within Abergavenny there are further RHPGs, at: • *Bailey Park* • *New Cemetary* • *Linda Vista Gardens* • *Abergavenny Castle* • *The Hill* • *Abergavenny Priory Deer Park*

Non Statutory Designations

Blaenavon Registered Landscapes of Outstanding Historic Interest	The Register of Landscape of Outstanding Historic Interest in Wales (Part 2.1) has been established, by Cadw/ International Council on Monuments & Sites (ICOMOS) UK to identify those landscape that can be considered of importance within Wales based upon a clear set of criteria. The eastern extent of Blaenavon RLOHI lies 1.7km to the west of the site.
Conservation Area	The historic core of Abergavenny Town Centre is designated as a Conservation Area. This reflects the historic core town centre and its medieval core, focussed on the Castle and St Mary's Church and the distinctive medieval layout of roads and burgage plots.
Access and recreation	The study area contains a network of local public footpaths and bridleways. There are also promoted long distance footpaths including: • Cambrian Way. This extends broadly north to south through Abergavenny and the wider study area. At its closest point it is around 1km to the east of the site. • Beacons Way. This route extends through the town of Abergavenny north and east through the study area. At its closest point it is around 50m to the west of the site boundary. • Usk Valley Walk. This follows the eastern bank of the River Usk and is around 1.7km to the south-west of the site at its closest point.

APPENDIX 2: LANDSCAPE CHARACTER AREAS

Abergavenny (MNMTHVS072).	This area extends across the urban area bordering the site to the west. It is evaluated as **moderate** overall. Key characteristics are: • Historic market town with distinctive core centred on the castle, St Mary''s priory church and the distinctive town hall. • Positive relationship with the River Usk valley floor • Scenic views to the Sugar Loaf and Blorenge enhance sense of identity.
Northern Hills (MNMTHVS015).	This area extends across the site and a broad tract of Monmouthshire to the east of the study area. It is evaluated as **High** overall. Key characteristics are: • Small irregular fields of permanent pasture enclosed by a managed hedges, hedgerow trees and treelines and small-scale woodland blocks, including ancient woodlands and alder woodland and orchards. • A gently rolling lowland landform. • Distant views, notable to the Blorenge and the Sugar Loaf and more locally to Ysgyryd Fawr and Fach. • The tranquil, intimate character away from the main traffic routes. • The distinctive small watercourses with associated riparian vegetation. • Sparsely settled with smaller villages and a predominantly traditional agricultural appearance.
Blorenge BBNP LCA 15 Blorenge. LANDMAP MRTHRVS840.	This area extends across upland to the west of the study area. It is evaluated as **outstanding** overall. Key characteristics are: • A distinctive landform with scenic views in and out across the Usk Valley to the Sugar Loaf and Black Mountains. • Strong sense of place reinforced by panoramic views and as an upland hill important as a landmark defining the Usk Valley. • Open exposed moorland of rock outcrops and scree-slopes with remnant stone walls and scattered windswept hawthorn scrub on lower slopes. • Remote with an absence of settlements. • Lower and mid slopes contain a traditional patchwork of managed hedges, hedgebanks, hedgerow trees and their native species diversity. • Important/high industrial heritage and cultural values associated with Blaenavon.
Ysgyryd Fach MNMTHVS013	This area extends into the site and extends to the immediate east. It is evaluated as **high** overall. Key characteristics are: • The hill is a distinctive and attractive dome rising from the lower ground and forming a visual focus and a backcloth to Abergavenny and to Coldbrook house and surrounding lower lying land. • Dominated by a block of mixed deciduous and coniferous woodland. • Large pasture fields on lower slopes enclosed by managed hedges. • Sparsely settled with small-scale traditional farmsteads and crossed by a network of footpaths.

Raglan Hinterland (MNMTHVS038).	This area extends across a small part of the study area to the southeast. It is evaluated as **high** overall. Key characteristics include: • Gently rolling domesticated mixed arable and pastoral lowland, diverse and intimate in character. • Well-settled landscape with numerous roads. Settlement forms a mixture of country estates, scattered houses and small villages, with farm complexes both large and small.
Ysgyryd Fawr (The Skirrid) BBNP LCA 12. LANDMAP MNMTHVS012.	This area extends across the highpoint to the north-east of the study area. It is evaluated as **outstanding** overall. Key characteristics include: • A distinct isolated hog-backed hill which forms a focal point of outstanding scenic quality within the surrounding lower lying landscape. • Long panoramic views towards the Sugar Loaf in the west, the Blorenge and Abergavenny to the south-west • Remote and isolated, windswept landscape with scattered scrub and hawthorn inter-mixed with bracken, heath and semi-natural grassland. Semi-natural woodland and coniferous plantations predominate on the lower western slopes whilst the head of the outlier remains open, dominated by rock outcrops. • Remote - There is little or no settlement other than the network footpaths which lead to the fort at the peak.
Penyclawdd Watershed (MNMTHVS051)	This area extends across the area to the north of the study area. It is evaluated as **moderate** overall. Key characteristics include: • Flat lowland landscape, forming the interface between the undulating hills and valleys and the upland plateaux of the Black Mountains. • Views out to the Sugar Loaf and Ysgyrdd Fawr to the east. • Visually open with medium to large-scale regular fields, • Well-settled and domesticated landscape, the tranquillity disturbed by the A465(T) and the railway.
Sugar Loaf BBNP LCA 12 Skirrid and Sugar Loaf . LANDMAP MNMTHVS004	This area extends across parts of the study area to the north-west. It is evaluated as **outstanding** overall. Key characteristics include: • Distinct landmark with the form of the peak. • Panoramic views towards the Blorenge and Abergavenny within the valley bottom. • Open and exposed character with a strong sense of place. • Remote with no settlement but highly popular recreational/tourism values. Access is limited to a few well used footpaths.
Sugar Loaf Scarps BBNP LCA 12 Skirrid and Sugar Loaf . LANDMAP MNMTHVS029)	This area extends across parts of the study area to the north. It is evaluated as **high** overall. Key characteristics include: • Forms the outward facing scarp slopes of the Sugar Loaf and its slopes are a distinctive and a rare feature. • Long panoramic views across Abergavenny and towards the Blorenge in the south. • Large open expanses of permanent pasture interspersed with occasional fields of arable crops dominate lower valley sides interspersed with remnant treelines and mature field trees.

- Sparsely settled landscape with scattered farmsteads, large houses and narrow roads winding their way up valley sides.

Llanover Lowland (MNMTHVS042)

This area extends across part of the study area to the west. It is evaluated as **high** overall. Key characteristics include:

- An attractive rolling lowland landscape
- An enclosed landscape with large irregular blocks of mixed deciduous and coniferous woodland, parkland and medium to large-scale fields
- A domesticated landscape with numerous large farmsteads, traditional cottages, country estates and small-scale linear settlements. It is crossed by a network of narrow roads as well as the main A4042(T) and the Newport to Hereford railway.

Upper Usk Valley (MNMTHVS046)

This area extends across the study area to the west. It is evaluated as **high** overall. Key characteristics include:

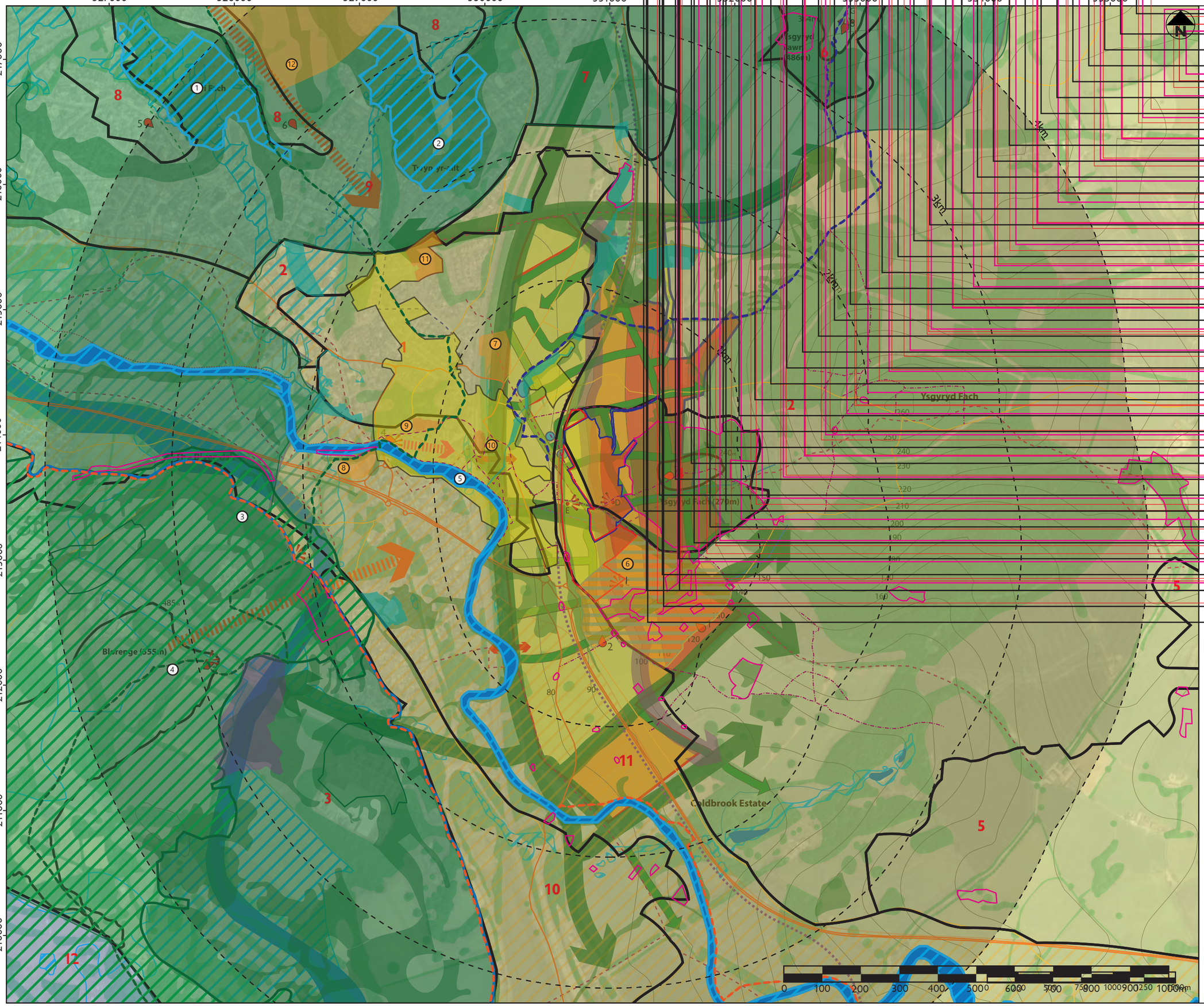
- An attractive flat open landscape with an attractive backcloth of hills and scarp slopes.
- The area has a distinct and strong sense of place as an extensive valley floor focused on the sinuous River Usk.
- Medium to large-scale fields of permanent pasture and arable crops
- Villages interspersed with large farmsteads and country estates interconnected by the B4598, A49(T) and the Newport to Hereford railway line.

APPENDIX 3: VIEWPOINT DESCRIPTIONS

VP	Location	Description of view	Co-ordinates	
			Northing	Easting
A	Cambrian Way/ Monmouthshire and Brecon Canal.	Glimpse view east from the canal towpath/Cambrian Way and seating area across the River Usk Valley to Ysgyryd Fach. The foreground is wooded and lower areas in the valley are filtered and partially obscured by vegetation. Urban areas in Abergavenny along with pylons and roads are visible in the middle distance. The site forms an attractive and distinctive green backcloth to view, with the fields rising sharply to the wooded summit of Ysgyryd Fach. Lower areas adjacent to the A465 and to the south of the site are more visually enclosed either by site-based vegetation along the A465 or by intervening foreground vegetation at the viewpoint.	28475	13071
B	Blorenge	Wide panoramic view east from the eastern edge of the scarp slope of the Blorenge. Abergavenny extends across the middle distance of the view contained on the lower-lying land of the Usk Valley. The summits of the Sugar Loaf and the Skirrid are prominent features in the view around to the north and the north-east respectively. Ysgyryd Fach adds to this sense of enclosure to the eastern edge of the town. In the distance, the view extends out into the rolling farmland of Monmouthshire.	27709	12232
C	Coldbrook Estate	Views north from the edge of the drive and approach to Coldbrook House and Estate extend across the southern part of the site only with local enclosure provided by elevated land and trees in the foreground. Abergavenny is largely obscured from the view by intervening woodland along the A465. Pylons extend across the foreground of the view and into the River Usk valley below. In the distance the distinctive summit of the Sugar Loaf forms an attractive backdrop to the view. Away to the east the Blorenge forms a more imposing backdrop to the Usk Valley.	31108	12839
D	Ysgyryd Fach	This viewpoint is located on a PRoW on the upper slopes of the site below Ysgyryd Fach and illustrates views across the site to the west and north-west. Site visibility to the east and the foreground comprises low hedges defining open pasture fields, sloping away to the low ground of the Usk Valley. To the south, the wooded brook provides local visual enclosure within the foreground. Abergavenny is clearly visible in the middle ground amongst tree planting and woodland. The Blorenge forms an imposing backdrop to the west and to the north the land rises sharply to the foothills of the Sugar Loaf, again forming an attractive backdrop to Abergavenny.	31036	13497
E	Footpath, A465	This viewpoint is located on a PRoW on the lower slopes of Ysgyryd Fach, adjacent to the A465. It illustrates views across the site to the	30611	13464

		south-east. The foreground comprises open pasture fields, rising away to the wooded high point of Ysgyryd Fach and parkland within the Coldbrook Estate to the south. The edge of the footpath to the north is enclosed by woodland along the stream corridor. Pylons extend across the skyline and into the Usk valley.		
F	Cambrian Way/Castle Meadows, Abergavenny	This viewpoint illustrates open views east from Cambrian Way/Castle Meadows at Abergavenny. The area is a popular recreation area with riverside paths and benches. The foreground comprises informal grassland focussed on the riverside with scattered mature trees and woodland. The backdrop to the view is the distinctive wooded landform of Ysgyryd Fach rising beyond the treeline of the Usk Valley. Lower parts of the site are obscured by intervening woodland and trees. More elevated fields within the site are either fully or partially visible.	29188	13980
G	The Skirrid	Open panoramic view south across rolling farmland. Ysgyyryd Fach forms a distinct wooded feature in the middle distance. The site is obscured by landform and woodland.		

APPENDIX 4: FIGURES



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- Incremental 1km buffer from site boundary
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

Statuary Designations

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- National parks - Bannau Brycheiniog and Black Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuary Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
2. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
3. Coed-y-person SSSI
4. Blorenge/Blorenge SSSI
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

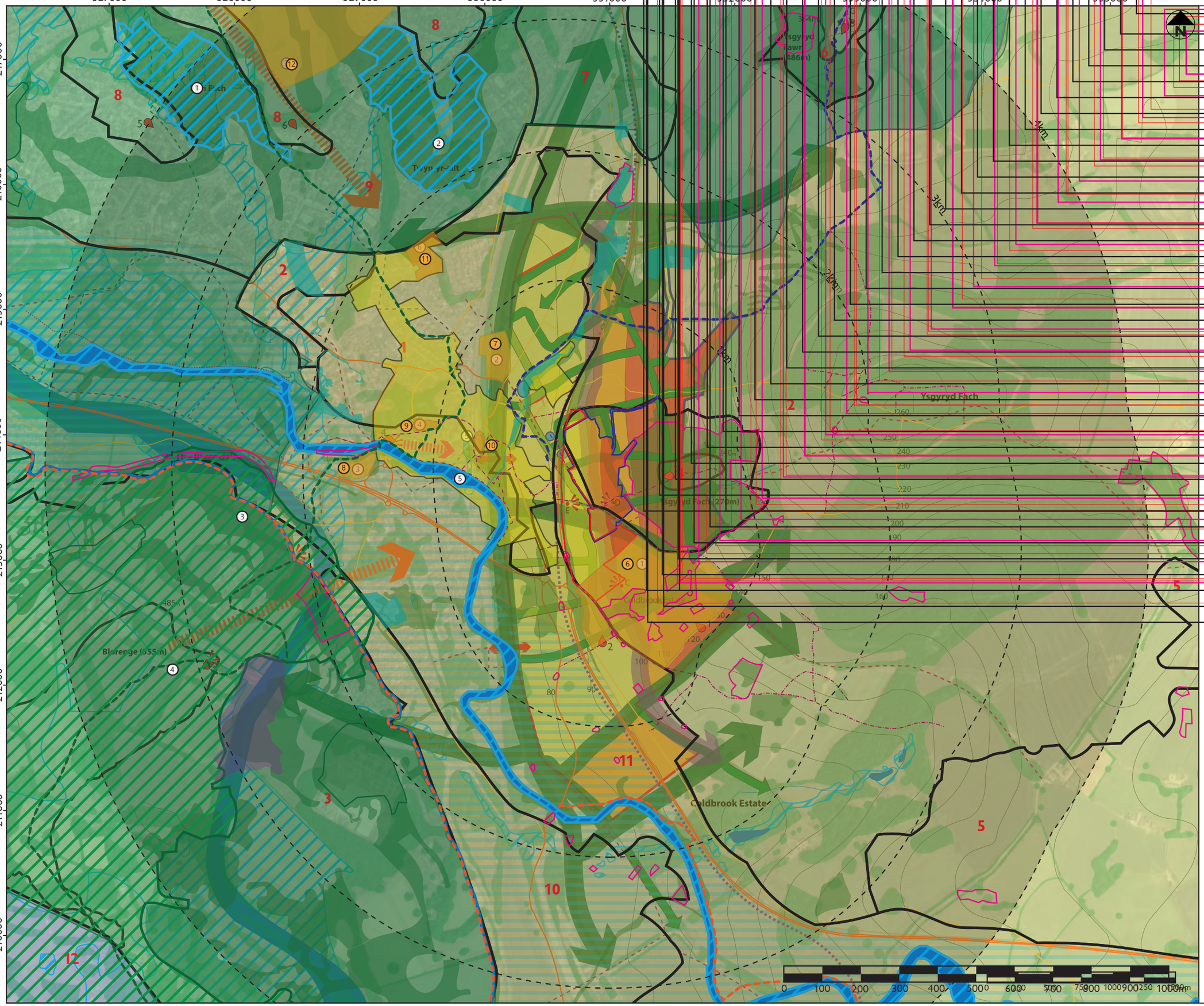
project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- Incremental 1km buffer from site boundary
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

Statuory Designations

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- National parks - Bannau Brycheiniog and Black Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuory Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
2. Sugar Loaf Woodlands (Deri-fach Woodland) SAC&SSSI
3. Coed-y-person SSSI
4. Blorenge/Bloreng SSSI
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. Coldbrook Historic Gardens and Parkland - (Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

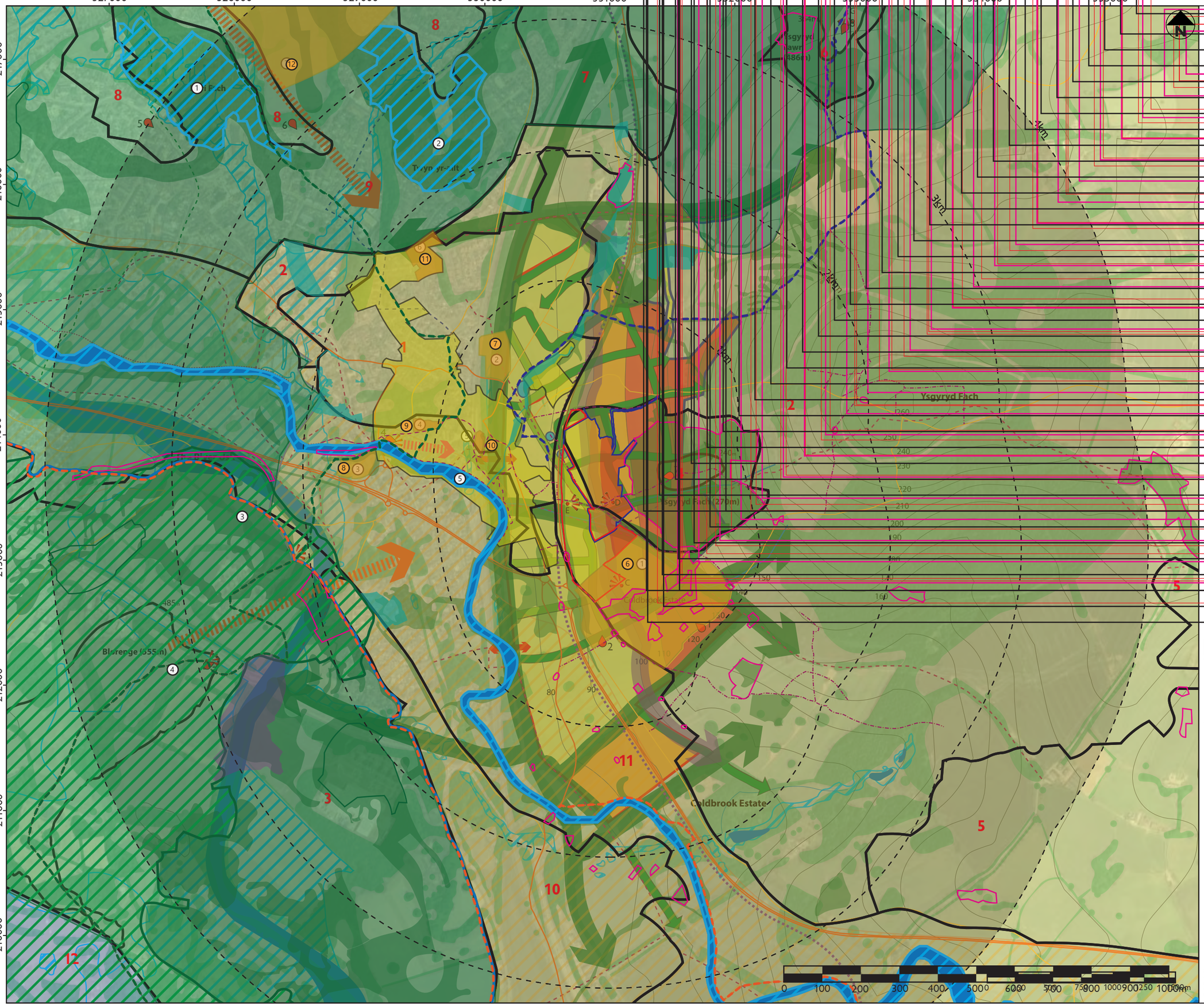
project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.



Landscape Designations

Key

- Red line boundary
- Blue line boundary
- ~~Incremental 1km buffer from site boundary~~
- Public Right of Way
- Brecon Beacons Way
- Usk Valley Way
- Cambrian Way
- Waterways

~~Statuory Designations~~

- SAC
- UNESCO World Herritage Sites - Blaenavon
- SINC
- Better woodland for Wales case boundary
- Woodland Trust Sites
- ~~National parks - Bannau Brycheiniog and Black~~ Mountains (Brecon Beacons National Park)
- Conservation areas and boundarys

Statuory Biodiversity Designations

1. Sugar Loaf Woodlands (Deri-fach Woodland) ~~SAC&SSSI~~
2. Sugar Loaf Woodlands (Deri-fach Woodland) ~~SAC&SSSI~~
3. Coed-y-person SSSI
4. ~~Blorenge/Bloreng SSSI~~
5. River Usk/Afon Wysg SSSI/SAC

Historic parks & gardens

6. ~~Coldbrook Historic Gardens and Parkland -~~ (Cadw/ICOMOS Register of Parks and Gardens of ~~Special Historic Interest in Wales~~).
7. Bailey Park
8. New Cemetary
9. Linda Vista Gardens
10. Abergavenny Castle
11. The Hill
12. Abergavenny Priory Deer Park

Rev.	Date	Comment	Drawn	Approved
P01	12.03.24	Initial draft	JM	GV

PRELIMINARY | **PLANNING** | DESIGN | TENDER | CONSTRUCTION

soltysbrewster

4 Stangate House
Stanwell Roa
Penarth
Vale of Glamorgan
CF64 2AA.

Telephone:- + 44(0) 29 2040 8476
e-mail:- enquiry@soltysbrewster.co.uk

client: Client

project: **RPS Abergavenny Candidate Site**

figure title: Landscape Designations

scale	drawn	approved	date
NTS @ A3	JM	GV	Mar 2024

figure number: XXX

Soltys Brewster Consulting is the trading name of Soltys Brewster Consulting Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 6262312.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Consulting Ltd. Soltys Brewster Consulting Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX 5: VIEWPOINT PHOTOGRAPHS

Ysgyryd Fach



A) Cambrian Way/Monmouthshire and Brecon Canal (N28475,E13071)

Y Fal - Sugar Loaf

Ysgyryd Fawr - The Skirrid

Ysgyryd Fach

Coldbrook Estate



B) Blorenge (N27709, E12232)

Blorenge

Y Fal - Sugar Loaf



C) Coldbrook Estate (N31108,E12839)

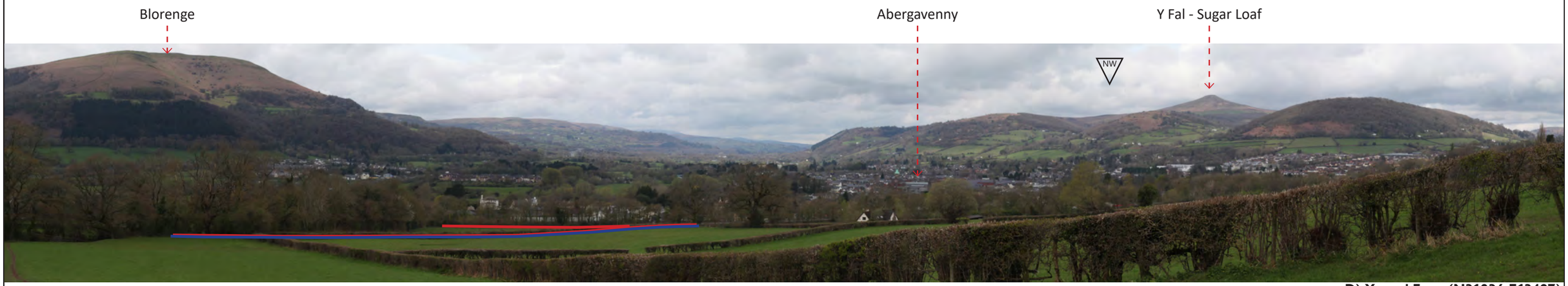
Key

Red Line Boundary

Blue Line Boundary

° project **Abergavenny East Development**	° figure Figure 3: Viewpoint Photography	° client RPS	
° doc 2488601-SBC-XX-ZZ-DR-L-003	° scale NTS@A3	° drawn JM	° date Apr 2024

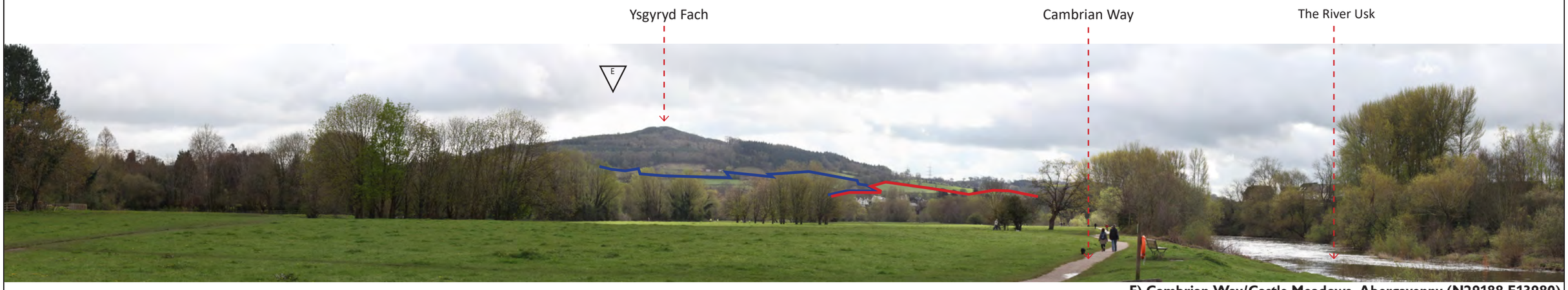
soltysbrewster



D) Ysgyrd Fawr (N31036,E13497)



E) Footpath, A465 (N30611,E13464)



F) Cambrian Way/Castle Meadows, Abergavenny (N29188,E13980)

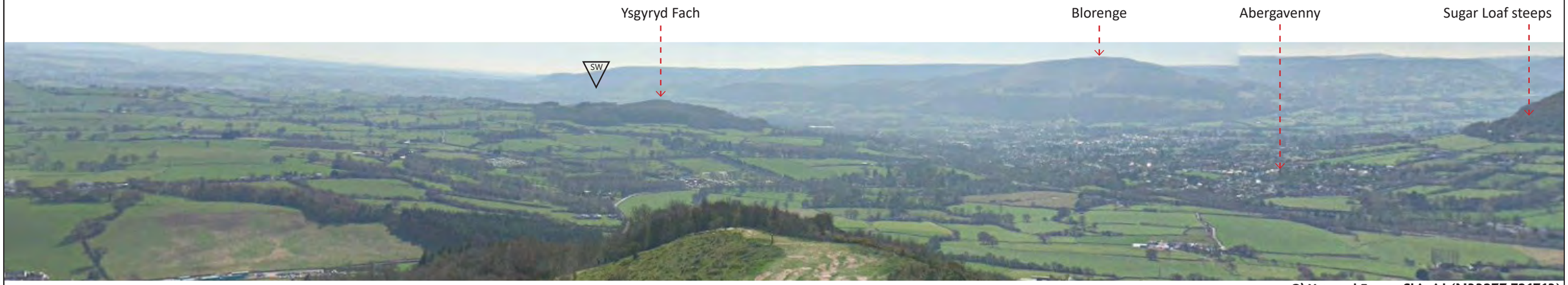
Key

Red Line Boundary

Blue Line Boundary

° project **Abergavenny East Development**	° figure Figure 4: Viewpoint Photography	° client RPS	
° doc 2488601-SBC-XX-ZZ-DR-L-004	° scale NTS@A3	° drawn JM	° date Apr 2024

soltysbrewster



G) Ysgyryd Fawr - Skirrid (N33277,E21713)

Key

Red Line Boundary

Blue Line Boundary

project	figure	client	
Abergavenny East Development	Figure 5: Viewpoint Photography	RPS	
doc	scale	drawn	date
2488601-SBC-XX-ZZ-DR-L-005	NTS@A3	JM	Apr 2024

soltysbrewster

Appendix 7

Preliminary Ecological Appraisal

COLDBROOK ESTATE
LAND EAST OF ABERGAVENNY
PRELIMINARY ECOLOGICAL APPRAISAL MARCH 2023



soltysbrewster ECOLOGY

4 Stangate House,
Stanwell Road,
Penarth,
Vale of Glamorgan,
United Kingdom.
CF64 2AA

Telephone:- 033 00 13 00 12
e-mail:- enquiry@soltysbrewster.co.uk
Web Site:- www.soltysbrewster.com

COLDBROOK ESTATE

LAND EAST OF ABERGAVENNY

PRELIMINARY ECOLOGICAL APPRAISAL

DOCUMENT REF: E2315301/DOC 01 – MARCH 2023

Issue	Revision	Stage	Date
1	-	Draft for review	29 Mar 2023
		For Issue	30 Mar

[redacted]

CONTENTS

Summary

1.0 Introduction

2.0 Methodology

Desk study

Extended Phase 1 Habitat Survey

Survey Constraints

3.0 Results

Desk study

Extended Phase 1 Habitat Survey

Fauna

4.0 Policies and Plans

5.0 Conclusions and Recommendations

References

Appendices

Appendix I Site Location Plan

Appendix II Desk Study Information Received from SEWBReC

Appendix III 2023 Extended Phase 1 Habitat Survey Plan and Target Notes

Appendix IV LDP Candidate Site Assessment Form

SUMMARY

Soltys Brewster Ecology were commissioned by RPS Group on behalf of Coldbrook Estate to undertake a preliminary appraisal of an area of land to the east of Abergavenny, Monmouthshire. The area is being promoted as part of a larger strategic candidate site via the LDP review process. The ecological baseline conditions within the land owned by Coldbrook Estate (Candidate Site) were established in March 2023 through a combination of desk study and Extended Phase 1 Habitat Survey.

Desk based consultation confirmed that the candidate site does not hold any designations for nature conservation. However, the small watercourses at the site have hydrological links to the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and River Gavenny Site of Importance for Nature Conservation (SINC) which are located over 400m west of the candidate site, beyond the A465 road corridor.

The desk study returned an extensive list of records for protected fauna and flora within 2km of the candidate site. This included the identification of several bat roosts within 500m of the candidate site boundary (a single record of foraging Soprano pipistrelle *Pipistrellus pygmaeus* within the red line boundary) as well as over 172 individual records of foraging and commuting bats within the 2km search radius. The data search included records of Great Crested Newt (GCN) within 2km of the candidate site boundary with 1no. records located within 600m. Records of Otter, Badger, and other priority mammalian species such as Hedgehog were also identified within the 2km search radius. There were also a small number of Slow-Worm records with the nearest located 500m north of the site. The desk study returned an extensive list of protected and priority bird species records within the 2km radius with multiple records for species such as Barn Owl and Skylark within proximity to the candidate site.

An Extended Phase 1 Habitat survey undertaken in March 2023 identified a range of habitats present at the candidate site and immediately adjacent area including improved grassland, arable fields, poor semi-improved grassland, broad-leaved woodland, dense scrub, running water, and an extensive hedgerow network. The survey found no evidence of any invasive plant species at the candidate site.

[redacted] The linear habitat features at the site such as the hedgerow network, woodland corridor and woodland edge were considered likely to support a range of commuting and foraging bat species. The candidate site contains a number of mature/veteran trees assessed to have a high, moderate and low potential to support roosting bats and were also considered of some suitability to support nesting Barn Owl. The habitats at the candidate site were also considered likely to support nesting

[1] Soltys Brewster Ecology. (2021) Land East of Abergavenny Preliminary Ecological Appraisal.

and foraging birds with the open areas of improved grassland and arable field also considered suitable to support ground-nesting birds such as Skylark. The extensive hedgerow network and woodland was considered to be of some suitability for Hazel dormouse. Although the majority of the habitats at the candidate site (i.e. grazed improved grassland/arable) are unsuitable for reptiles, the field margins and poor semi-improved grassland located in the southern part of the candidate site contained suitable shelter, cover and basking opportunities and were considered to have a low potential to support common reptiles. No waterbodies are located directly within the candidate site boundary, however, a review of OS mapping found 2 ponds located 250m to the south of the site There are 3 small streams present within the site boundary which run generally form east to west under the A465 Rd. The habitats at the candidate site (hedgerows, woodland and to a lesser extent, improved grassland) were considered suitable to support GCN within their terrestrial phase.

Further survey work would be recommended to inform a planning submission at the candidate site and to inform any specific mitigation or licensing requirements with regards to bats, Badger, Barn owl, Great Crested newt, Hazel dormouse and reptiles. Any future vegetation works at the site, such as tree and scrub removal, would also be subject to seasonal constraints i.e. outside of the bird nesting season.

Development at the candidate site presents opportunities for both strategic & local biodiversity enhancement. The large improved/arable grassland fields were assessed as being of limited ecological interest, with features of ecological value in the context of the site primarily associated with extensive hedgerow network, woodland corridor, and other linear habitat features. Any proposed layouts should incorporate these features into the overall masterplan and aim to retain, protect and enhance the boundary features as part of a green infra-structure network.

1.0 INTRODUCTION

1.1 Soltys Brewster Ecology were commissioned by RPS Group on behalf of the landowner (Cold brook Estate) to undertake a preliminary ecological appraisal of an area of land to the east of Abergavenny. The area is being promoted as a candidate site as part of a wider strategic development allocation through the LDP review process. A survey to establish the ecological baseline conditions and identify any ecological constraints or opportunities with the site is required.

1.2 The candidate site is located to the east of Abergavenny along the A465 carriageway (central grid reference SO3079 1348) and comprises a large area of approx. 31ha (see plan in Appendix I). The candidate site and survey area mostly consist of improved grassland, arable fields, broadleaved woodland, running water and hedgerow margins.

1.3 The current report presents the findings of an ecological desk study, review of previous survey reports (SBE, 2021) and Extended Phase 1 Habitat survey undertaken at the candidate site and adjacent area in March 2023. The current report describes the existing ecological conditions as well as identifying any potential ecological constraints/opportunities associated with allocation of the site for residential development as part of the LDP review.

2.0 METHODOLOGY

2.1 In order to establish the baseline ecological conditions at the candidate site and adjacent habitats, a combination of desk-based consultation and Extended Phase 1 Habitat survey were undertaken in March 2023.

Desk study

2.2 The desk study involved consultation with the South East Wales Biodiversity Records Centre (SEWBReC) to identify any records of rare, protected or notable flora and fauna at the candidate site and within a radius of 2km extending from the central point of the candidate site. The search criteria also included information relating to the location and citation details (where available) for any sites designated for their nature conservation interest such as Sites of Special Scientific Interest (SSSIs) or Sites of Importance for Nature Conservation (SINCs).

Extended Phase 1 Habitat Survey

2.3 The fieldwork was undertaken on 10 March 2023 by a suitably experienced ecologist[2] and followed standard Phase 1 Habitat Survey protocol (JNCC, 2010) as amended by the Institute of Environmental Assessment (1995). The survey area covered land included within the candidate site boundary and observations on immediately adjacent field parcels. All habitats within and immediately adjacent to the survey area, were classified and mapped as accurately as possible. Habitats considered to have potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Eurasian badger *Meles meles* setts and dung-pits[3]). Incidental observations of birds on or flying over the site were also recorded and any incidence of invasive weed species (e.g. Japanese knotweed *Fallopia japonica*) noted.

2.4 A map of habitats was drawn up and target notes were used to identify features of ecological interest. Where possible, habitats were cross-referenced to any relevant important UK or Wales priority habitats as identified under Section 7 of the Environment Act (Wales) 2016.

2.5 During the field survey any trees or structures (e.g. single storey corrugated metal stable) at the candidate site a were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2016). The categories are as follows:

- **Known or confirmed roost**

[2] Full Member of the Chartered Institute of Ecology & Environmental Management (CIEEM)
[3] Given the sensitive nature of the information this has not been mapped on the Phase 1 map.

- **High** – A tree or structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
- **Moderate** – A tree or structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
- **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically. Or: A tree of sufficient size & age to contain PRFs (Potential Roost Features) but with none seen from the ground or features seen with only very limited roosting potential.
- **Negligible** – Negligible habitat features on site likely to be used by roosting bat

3.0 RESULTS

Desk Study

SEWBReC Records

3.1 Consultation with SEWBReC confirmed that the candidate site does not contain any designations for nature conservation. The internationally designated River Usk Special Area of Conservation (SAC) and SSSI is located ca.. 500m west of the candidate site (Table 1), and although both sites are separated by residential development and transport corridors there are a number of small watercourses and drains at the candidate site which likely flow into the River Usk. The locally designated River Gavenny SINC is also located ca... 500m west of the candidate site boundary, and supports migratory fish species, Otter *Lutra lutra* and White Clawed Crayfish *Austropotamobius pallipes* and has a direct hydrological link (tributary) to the River Usk. Similarly, the small watercourses at the candidate site are likely to drain into the River Gavenny.

3.2 Desk based consultation also identified Cwm Mill Section, Mardy SSSI and Ross Road and Maindiff Court Hospital SINCs within 1 – 1.5km of the candidate site's boundary but given the physical separation between the sites they are not likely to be impacted by the proposal and were not considered of ecological relevance (designated for habitat and geological features). To the east of the candidate site is an area of ancient woodland at Ysgyryd Fach (also an NRW Priority Area PAWS). Summary plans to illustrate the SEWBReC records are included in Appendix II.

Table 1 – Statutory and non-statutory designated sites within 1km of the candidate site boundary.

Site Name	**Citation**	**Distance from candidate site boundary.**
River Gavenny SINC	River Gavenny known to support anadromous fish species as well as resident populations of Brown/Sea Trout and Bullhead. White Clawed Crayfish, Otter and Dipper also present.	Approx. 500m west
River Usk SAC	Designated for the presence of Annex II species including Sea Lamprey, Brook Lamprey, River Lamprey, Twaite Shad, Atlantic Salmon, Bullhead and Otter. Supports Annex I habitat; Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation.	Approx.500m west
River Usk (Lower) SSSI	*See above.* *The River Usk (Lower Usk) is a rare example of a large mesotrophic lowland river which has not been subject to significant modification by man. The River Usk (Lower Usk)*	*Approx. 500m west*

	supports a wide range of riverside breeding birds, important assemblages of craneflies including rare and scarce species, Otter and also provides valuable feeding and roosting habitats for several bat species including Daubenton's bat.	
Ross Road SINC	Diverse site supports species-rich MG1 neutral grassland, broad-leaved woodland, scrub and two watercourses.	Approx. 1.5km north-west
Maindiff Court Hospital SINC	Site supports species rich MG5/6 grassland, mature parkland trees and scrub.	Approx. 1.5km north

3.3 The data search returned an extensive list of species records within a 2km radius of the candidate site -1,048 Priority Species, 355 Species of Conservation Concern and 165 Locally Important Species. The following priority species have been recorded within the site boundary Kestrel *Falco tinnunculus* (S7, Bern, CITES, WBR (RSPB)), Peregrine Falcon *Falco peregrinus* (Bdir1, WCA 1.1., Bern, CITES), Red Kite *Milvus milvis* (Bdir1. WCA 1.1, CITES), Weasel *Mustela nivalis* (NRW, Bern), and Bluebell *Hyacinthoides non-scripta* (WCA8). The following locally important species have been recorded within the site boundary Rounded Pygmy -moss *Acaulon muticum* (RDB1 (Wales), RDB2 (UK)), Monks-hood *Aconitum napellus,* and Black Horehound *Ballota nigra.*

3.4 The desk study search returned a total of 172no. individual bat records within a 2km search radius of the candidate site. One record of a foraging Soprano pipistrelle was returned within the red line boundary. Bat records within the 2km buffer include the identification of separate bat species including Whiskered bat *Myotis mystacinus*, Common and Soprano Pipistrelle, Brown Long Eared bat Noctule *Nyctalus noctule,* Brandts bat *Myotis brandit* and Lesser Horseshoe bat *Rhinolophus hipposideros*. Seven bat roosts were confirmed within 1km of the site for including day roosts/occasional male roost for Common pipistrelle *Pipistrellus pipistrellus*, Whiskered bat *Myotis mystacinus*, Brown long eared *Plectus auritus*, Natterers bat *Myotis nattereri* and a maternity roost (species not provided).

3.5 Other mammalian records in the data search results included an Otter sighting along the River Gavenny and field sign (spraint) recorded at the River Usk, located within 200m of the western candidate site boundary. A historic record (dated 2005) of a Badger sett located Ysgyryd Fach was included in the data search. There was also a Badger road kill reported along the A465 carriageway ca. 200m west of the site, as well as an additional road kill sighting recorded ca... 1km south west of the candidate site. Other S7 priority listed small mammals recorded in a 2km radius of the candidate site include Hedgehog *Erinaceus europaeus*, Polecat *Mustela putorius*, and Stoat *Mustela erminea.*

3.6 The data search returned a record of Great Crested newt *Triturus cristatus* located ca. 600m from the western site boundary within a garden pond(2007). A further 17no. records were identified within 2.5km of the candidate site boundary. Other amphibians such as Smooth newt *Lissotriton vulgaris* and Palmate newt *Lissotriton helveticus* have also been recorded within garden ponds located within 150m of the candidate site boundary. There are multiple records for Common frog *Rana temporaria* and Common toad *Bufo bufo* within the wider landscape, the nearest of which is located ca. 100m south-west. There were a limited number of common reptile records included in the desk study results (8), with Slow-worm *Anguis fragilis* recorded on five occasions with the nearest record 500m of the north western site boundary and a single record for Grass snake *Natrix Helvetica* recorded approximately 1km to the west.

3.7 An extensive number of protected and priority listed bird species records returned within the 2km search radius (189no. records), the majority of which were associated with the habitats along the River Usk to the west of the site. In a 1km search radius from the candidate site, records of bird species listed under Schedule 1 of the Wildlife and Countryside Act (1981) (as amended) include those for Barn owl *Tyto alba*, Peregrine *Falco peregrinus*, Redwing *Turdus iliacus*, Fieldfare *Turdus pilaris*, Common Crossbill *Loxia curvirostra*, Brambling *Fringilla montifringilla*, Goshawk *Accipiter gentilis*, Hobby *Falco 11pprox.11* , Kingfisher *Alcedo atthis,* Merlin *Falco coumbarius* and Golden Oriole *Oriolus oriolus*. Records of S7 priority listed bird species include those for Bullfinch *Pyrrhula pyrrhula,* Cuckoo *Cuculus canorus*, Linnet *Linaria cannabina*, Spotted Flycatcher *Muscicapa striata*, Skylark *Alauda arvensis*, Curlew *Numenius arquata*, Tree Pipit *Anthus trivialis*, Kestrel *Falco tinnunculus*, Wood Warbler *Phylloscopus sibilatrix*, Marsh Tit *Poecile palustris*, Hawfinch *Coccothraustes coccothraustes*, Yellowhammer *Emberiza citrinella*, Yellow Wagtail *Motacilla flava*, Willow Tit *Poecile montana*, Lesser Redpoll *Acanthis cabaret*, House Sparrow *Passer domesticus*, Dunnock *Prunella modularis*, Song Thrush *Turdus philomelos* and Nightjar *Caprimulgus europaeus*. Given the size of the site and close proximity to the River Usk there is likely to be some interchange of species, particularly those associated with scrub, hedgerow or woodland habitats.

3.8 The data search returned some records of protected fish species, all associated with the River Usk and River Gavenny. There are records of Atlantic Salmon *Salmo salar*, Brown/Sea Trout *Salmo trutta*, Eel *Anguilla Anguilla* and Sea Lamprey *Petromyzon marinus* within these watercourses.

3.9 The data search included 150 priority listed (S7) invertebrate species within close proximity to the candidate site. There were individual lepidoptera records of Dusky Thorn *Ennomos fuscantaria*, Grey Dagger *Acronicta psi,* Knot grass *Acronicta rumicis*, Mouse moth *Amphipyra tragopoginis,* Garden Tiger *Arctica caja, Atethmia centrago,* Rustic *Hoplaodrina blanda*, Small Blue butterfly *Cupido minimus* and Cinnabar moth *Tyria jacobaeae*. Other S7 Priority Species invertebrate recorded include Violet Oil-beetle *Melo violaceus,* Southern Iron Blue

Mayfly *Baetis niger*, Northenr February red stonefly *Brachyptera putata* and Hornet Robberfly *Asilus crabroniformis*.

3.10 Invasive species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) such as Japanese Rose *Rosa rugosa*, Japanese Knotweed, Himalayan Balsam *Impatiens glandulifera*, Rhododendron *Rhododendron ponticum* and Giant Hogweed *Heracleum mantegazzianum* have been recorded within habitats in a 500m radius of the candidate site boundary.

Summary of the SBE 2020 Survey findings

3.11 The Phase 1 survey undertaken in 2020 (SBE 2021) found that the land to the east of the Candidate site comprised of habitats consistent with its agricultural use including improved grassland, arable fields and poor semi-improved grassland. Broad-leaved mixed woodland, dense scrub, tall ruderal, running water and ditches, hedgerows and farm buildings was also noted during the survey. The main habitat features of ecological interest included the hedgerow network, scattered trees, woodland corridors/edge, dense scrub and poor semi-improved grassland as these were considered suitable to support protected and priority species, potentially including foraging and commuting bats, nesting birds, Hazel Dormouse, Great Crested Newts and reptiles. [redacted]

Extended Phase 1 Habitat Survey 2023

3.12 The distribution and extent of habitats recorded in March 2023 at the candidate site and wider survey area are illustrated on the Extended Phase 1 Habitat Plan with accompanying target notes in Appendix III. The candidate site and survey area support a range of habitat types (consistent with the previous 2020 survey and current land use) including improved grassland, arable fields, poor semi-improved grassland, hedgerows, running water, ditches, dense scrub, broad-leaved woodland, and scattered trees. A post and rail fence is present around the entire red line boundary.

Buildings/outbuildings

3.13 There was a single storey, corrugated metal stable located in Field 1 with a horse present during the survey. Access to the field was not possible during the survey however, there did not appear to be any obvious external roosting potential for use as a day roost (Negligible potential) – e.g. no dense ivy, generally unsuitable construction material (corrugated metal) for day roosting. However, the structure could be used occasionally as a night roost or feeding perch by bats as it is open to one side. Nesting birds (e.g., Swallow) could also make use of the structure during the breeding season (typically March – August).

Improved grassland

3.14 The field parcels in the northern part of the candidate site and survey area consist of grazed improved grassland fields (3 out of 8 fields surveyed). At the time of the current survey field 1 and 2 contained horses. The grassland is characterised by a short sward height and low floral diversity with species present including Perennial Rye Grass *Lolium perenne*, Annual Meadow Grass *Poa annua*, Creeping Buttercup *Ranunculus repens*, Dandelion *Taraxacum officinale* and Ribwort Plantain *Plantago lanceolata*.

Plate 1 – Improved grassland field (F3)



Arable

3.15 The site contains five fields comprising of arable cropland located at the southern part of the site (F4-8). The current crop at the time of the survey was a type of brassica. The field margins contained Perennial rye grass/ Annual meadow grass, with stone/rubble piles present (assume to have been removed during the ground preparation prior to sowing).

Plate 2 Field margin of arable field 7



Poor semi-improved grassland

3.16 There is a section in Field 8 that has not been sown with an arable crop. This area of grassland has been categorised as poor semi-improved. Species present including Bent grasses *Agrostis sp*., Foxtail *Alopecurus sp*., Tufted Hair Grass *Deschampsia cespitosa*, Selfheal *Prunella vulgaris*, Silverweed *Potentilla anserina*, Dock *Rumex sp*, and Soft rush *Juncus effusus*. The western field boundary was considerably wetter during the survey as run-off from the field is naturally flowing into the stream on the western site boundary.

Broad-leaved semi-natural woodland

3.17 The candidate site contains a wooded stream corridor located towards the centre of the site boundary (Plate 3). The broad-leaved woodland corridor largely consists of tall mature Oak *Quercus sp*. and Ash *Fraxinus excelsior* trees. There are also stands of Hazel *Corylus avellana*, Hawthorn *Crataegus monogyna*, Holly *Ilex aquifolium*, Field Maple *Acer campestre*, Apple *Malus sp*., Rose *Rosa sp*. and Elder *Sambucus nigra*. The woodland ground-flora consists of Hart's-Tongue Fern *Asplenium scolopendrium*, Ivy *Hedera helix* and Male fern *Dryopteris filix-mas*.

3.18 A collection of mature broad-leaved trees, located within F6 were also categorised as broad-leaved woodland that include several closely grouped mature Ash, Sycamore, and Beech *Fagus sylvatica*. There was limited understorey vegetation present during the survey.

3.19 The fields and hedgerow margins at the candidate site and wider survey area support a number of solitary standing broad-leaved trees. These trees (mainly Oak and Ash) appear veteran in size and appearance and contain various roosting opportunities for bats and birds.

Plate 3 – Woodland corridor intersecting the north and southern part of the candidate site.



Dense and scattered scrub

3.20 There are small areas of dense/continuous scrub within the candidate site boundary. The western boundary of the candidate site (running parallel to A465) consists of a combination of woodland, scattered trees an outgrown hedge with a dense Bramble understory. The hedgerow along the southern boundary of Field 7 is predominantly unmanaged contains a section of dense Gorse *Ulex sp*. and Bramble.

Hedgerows

3.21 The candidate site and wider survey area supports a large hedgerow network containing a mixture of defunct and intact hedges. In total, 11 no. separate hedgerows were recorded.

<u>Intact species-poor</u>

3.22 The majority of the hedgerows located at the candidate site and wider survey area were categorised as intact species-poor hedgerows and consisted either of a single species (namely Hawthorn) or a mixture of Hawthorn, Hazel, Blackthorn, Holly and Field Maple. Most of these hedgerows were also found to be intensively managed and had been cut/trimmed to a height of c.. 1.5 – 2.0m.

3.23 Many of the hedgerow margins within fields containing livestock/improved grassland were found to be intact species-poor or outgrown hedges. Similarly, to the hedgerows described in paragraph 3.22, the defunct hedges at the site consisted either of a single species or a mixture of a small number of woody species. Fences were present around these fields.

Species-rich with trees

3.24 The candidate site and wider survey area contained several hedges which was considered to be species-rich hedgerows with trees. The south eastern field margin at field 7 contained a mixture of broad-leaved species with Oak, Ash, Holly , Hazel and Hawthorn present. A species-rich hedgerow with trees also lines the border of the candidate site to the A465 carriageway (H36). The hedge contains a number of mature Sycamore, Oak, Hazel, Ash, Field Maple, Birch and Willow trees.

Plate 4-Species rich hedgerow with trees (south eastern boundary of field 7)



Species-poor with trees

3.25 The site contains a single species-poor hedgerow with trees, located namely along the southern candidate site boundary between field 6 & 7 . The hedge mainly consists of Hawthorn, Holly and bramble with several mature trees including Field Maple, Oak and Ash.

Running water

3.26 The site supports a series of small streams and ditches. The largest watercourse at the site is located within the woodland corridor towards the centre of the candidate site. The stream comprises of a rocky and muddy substrate, is narrow, fast-flowing(at time of survey), steep-sided and shallow in depth (<5cm) although flow and depth is likely to be seasonal. The stream corridor also contains a lot of woody debris and leaf litter. The stream flows from east to west before entering a culvert under the A465 carriageway. A review of OS Mapping indicates that the stream later joins the River Gavenny located over 450m to the west of the candidate site (which links to the River Usk).

3.27 There are also a number of small streams running at the base of the hedgerow network. These streams are ca. 1m wide and 20cm deep and likely only hold water following periods of heavy rainfall. Similar to above, the streams converge before entering a culvert off-site which later links to the River Gavenny.

3.28 There is a larger stream located on the western side of Field 8. This watercourse comprises of rocky/stone substrate-very little/no submergent vegetation at the time of the survey. It was approximately 1m wide and 30cm deep and relatively slow flowing. The stream corridor contained several mature trees and understorey vegetation consistent with that of a typical wooded stream e.g. Male Fern, Harts tongue Fen, Hemlock Water dropwort. The steam flowed north then west into the adjacent broad-leaved woodland and likely into the River Gavenny on the other side of the A465.

Plate 5-Stream located on the western boundary of Field 8



Invasive species

3.29 The survey found no incidences of any invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) at the candidate site or immediately adjacent areas.

Fauna

3.30 In the course of the survey, a search of field signs for protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report, these species meet any of the following criteria:

- Species protected by British or international law;
- Priority species included on Section 7 (Environment Act, Wales);
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists);

Badger

3.31 [redacted]

[redacted]

Bats

3.33 Whilst the majority of the habitats at the site (i.e. improved grassland and arable field) provide limited foraging resources for the bats, other ecological features including the hedgerow network, mature trees and woodland/stream corridors were considered suitable to support a range of foraging and commuting bat species and are likely to act as important habitat corridors for bats in the wider landscape.

3.34 The survey identified a large number of trees at the site with potential to support roosting bats. This included 9no. trees with a high potential to support roosting bats, 12no. trees with moderate potential and 10 trees,

[4] Sensitive information – references to the exact location of Badger setts at the site have been removed from this document and supporting plans.

mainly associated with the boundary vegetation with low potential (see notes in Appendix III). The mature Oak and Ash trees located within the woodland corridors were collectively considered to be of a moderate/high potential to support roosting bats. Scattered trees at the site were found to contain a number of potential roost features (PRFs) in the form of woodpecker holes, cavities, split bark, deadwood and thick ivy stems. The majority of the isolated trees located within the improved/arable grassland fields were found to be in a poor condition (including a number of standing deadwood) and contained numerous PRFs including large cavities and were considered suitable to support a number of roosting bats.

Birds

3.35 A number of birds were seen/heard at the site during the survey. This included Buzzard *Buteo buteo*, House Sparrow, Tree creeper *Certhia familiaris,* Red Kite *Milvus milvus,* Coal tit *Periparus ater,* Blue Tit *Cyanistes caeruleus*, Blackbird *Turdus merula*, Robin *Erithacus rubecula*, Wren *Troglodytes troglodytes*, Magpie *Pica pica*, Rook *Corvus frugilegus* and Carrion Crow *Corvus corone*. Of the species noted, House Sparrow are listed as priority species under Section 7 of the Environment Act (Wales) (2016). The habitats at the site such as the hedgerow network, dense scrub, woodland and scattered trees were considered likely to support a number of nesting and foraging bird species. There were a number of bird nests noted within the tree canopies. Some of the trees assessed to have high/moderate potential to support roosting bats also contained suitable features (i.e. large cavities) for use by nesting Barn Owl although no pellets or other evidence of use was noted during the current survey. The desk study also contained two records of nesting Barn owl within trees at Ysgyryd Fach located east of the candidate site. The large open areas of improved grassland and arable field provide suitable habitats for ground-nesting bird species such as Skylark although none were heard/seen during the current survey.

Great Crested Newt

3.36 No waterbodies were identified within the immediate site boundary. The habitats around the field margins and boundaries of the site (i.e. hedgerow network and woodland edge) were considered suitable to support Great Crested Newt within their terrestrial phase. The desk study also returned two records of Great Crested Newt within 600m of the candidate site. GCN are known to disperse up to 250m from breeding ponds and may travel further in search of higher quality habitats e.g. woodland patches within an arable landscape (Langton *et al.,* 2001). As such, the habitats at the candidate site (in particular towards the northern extent of the site) were considered to have a low potential to support GCN within their terrestrial phase.

Hazel Dormouse

3.37 Although the desk study did not identify any records of Hazel Dormouse *Muscardinus avellanarius* within 2km of the candidate site, the linear habitat features at the site such as the species-rich hedgerow margins and

woodland corridors were considered suitable to support the species. These features contain a number of potential food sources (e.g. Hazel, Oak, Bramble), are structurally suitable containing a continuous understorey layer and have existing connectivity to larger woodland parcels in the wider landscape which could support a source population (e.g. at Ysgyryd Fach and A465 corridor). Many of the hedgerows located towards the north between the improved(grazed) grassland and the arable fields to the south were found to either be defunct or intensively managed (regularly cut/trimmed) and were not considered suitable to support dormouse. Gnawed hazelnuts collected during the current survey were attributed to either squirrel, or woodmouse.

Reptiles

3.38 The majority of the habitats located at the candidate site and adjoining area (e.g. improved grassland and arable field) were considered of limited suitability to support reptiles. The grazed areas of improved grassland lack any suitable cover or shelter for reptiles and are limited in foraging resources. However, field margins around the arable fields and in particular field 8, containing poor semi-improved grassland provide suitable cover, foraging resources and basking opportunities and could support a small number of common reptiles such as Slow-Worm, which has been recorded within 300m of the candidate site's boundary. However, this habitat is relatively isolated within the arable/agricultural landscape and the likelihood of reptiles being present was considered to be low.

Otter and Water Vole

3.39 The habitats at the site were not considered suitable to support Otter or Water Vole *Arvicola amphibius*. The watercourse running through the woodland corridor and drainage ditches are both small in size/depth and are unlikely to support sufficient prey resources for Otter. The wet ditches (as described in paragraph 3.25 – 3.26) lack any bankside vegetation capable of supporting Water Vole. As such, no further consideration is given to Otter and Water Vole during the current report but further consideration may be required with any detailed further planning application e.g. CEMP to allow for occasional use by Otter (the species is known to be present along the Usk and Gavenny corridors to the west). .

White-Clawed Crayfish

3.40 Although the SEWBReC search did not return any records of White-Clawed Crayfish *Austropotamobius pallipes* within 2km of the candidate site, the designation description for River Gavenny SINC includes reference to the presence of the species within a tributary just within the Brecon Beacons National Park boundary. A search of NBN Atlas[5] identified two historic crayfish records dating from 1993 and 2000 associated with watercourses ca. 2km north and 3km north of the candidate site. The watercourses within the woodland corridors at the site were considered of limited suitability to support White-Clawed Crayfish. Although the watercourse at Target

[5] https://nbnatlas.org/

Note 13 contains a rocky substate, soft banks and suitable refuges (e.g. rocks, logs and fallen leaves) the stream was flow-flowing and very shallow at the time of the survey (water depth <5cm). Crayfish are typically associated with watercourses 0.75m to 1m in depth but have been known to occasional use shallow watercourses with a water depth of around 5cm (Holdich, 2003). However, it is unlikely a watercourse this shallow could continually support a crayfish population in the long-term. In addition, there are no direct hydrological links to the watercourses where the historic crayfish records are located. No further consideration is given to the development impacts on White Clawed-Crayfish.

Invertebrates

3.41 No invertebrates were noted during the survey which is likely to be a result of the time of year, cooler temperatures and snow that had fallen earlier in the day. As described for other species, the improved grassland and arable fields are likely to provide little (if any) resources for species of conservation interest. Other habitats at the site, including hedgerows, streams/ditches, mature trees and woodland will however support a more diverse assemblage of invertebrates.

5.0 POLICIES AND PLANS

4.1 The following local and national planning policy relating to nature conservation and biodiversity are considered of relevance to the site.

Planning Policy Wales (2021)

4.2 This document set out the land use planning policies of the Welsh Government with Chapter 6 dealing with Distinctive and Natural Places which covers Biodiversity and Ecological Networks. The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN's), with TAN 5 addressing Nature Conservation & Planning.

4.3 TAN 5 identifies a number of key principles, which the town and country planning system in Wales should consider. Those relevant are detailed below:

- Work to achieve nature conservation objectives through a partnership between local planning authorities, Natural Resources Wales (NRW), voluntary organisations, developers, landowners and other key stakeholders;
- Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time;
- Ensure that the UK's international obligations for site, species and habitat protection are fully met in all planning decisions;
- Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;
- Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;
- Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;
- The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

Environment (Wales) Act, 2016

4.4 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

Section 6 – Biodiversity and resilience of ecosystems duty

4.5 Section 6 of the Act places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

Section 7 – Biodiversity lists and duty to take steps to maintain and enhance biodiversity

4.6 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

Local Planning Policy

Monmouthshire County Council Local Development Plan (2011 to 2021)

4.7 The Monmouthshire County Council LDP was adopted in February 2014, replacing the Monmouthshire Unitary Development Plan (UDP) to become the adopted development plan for the County (excluding the part within the Brecon Beacons National Park). Following a review in 2018, the current plan will be replaced with a revised LDP (2018 to 2033) and is scheduled to be adopted in 2021. Policies of relevance to the proposed site within the current LDP include:

Key Policy:

3. VALUING OUR ENVIRONMENT

Rural Environment and Biodiversity

- *Monmouthshire has major biodiversity and landscape resources that need to be preserves and should be protected, managed and enhanced.*
- *There is a need to improve connectivity within the landscape through protecting and improving existing wildlife networks and corridors and creating new linkages to allow species to move and adapt to climate change impacts.*

The LDP seeks to influence these issues by:

- *Ensuring that new development does not cause harm to international, national and locally protected sites and species and that where appropriate and necessary, avoidance, mitigation and compensation measures are incorporated, while ensuring that new benefits for Biodiversity are explored.*

- *Undertaking a Habitats Regulations Assessment to ensure that the cumulative effects of development in Monmouthshire and adjoining areas do not result in harm to internationally designated nature conservation sites.*
- *Ensuring that biodiversity is considered in any development in order to protect any existing interest on the site and encourage biodiversity enhancements where necessary.*
- *Protecting high quality landscapes throughout the County, paying particular attention to those contained in the Wye Valley AONB and in the setting of the Brecon Beacons National Park.*

Detailed Policies:

STRATEGIC

Policy S13 – Landscape, Green Infrastructure and the Natural Environment. Development proposals must:

1. Maintain the character and quality of the landscape by:

(i) identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character;

(ii) protecting areas subject to international and national landscape designations;

iii) preserving local distinctiveness, sense of place and setting;

(iv) respecting and conserving specific landscape features, such as hedges, trees and ponds;

(v) protecting existing key landscape views and vistas.

2. Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure network.

3. Protect, positively manage, and enhance biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them.

4. 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.

LANDSCAPE AND NATURE CONSERVATION

Policy LC1 – New Built Development in the Open Countryside

"...new built development will only be permitted where all the following criteria are met:

d) the development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity or local amenity value"

GREEN INFRASTRUCTURE

Policy GI1 – Green Infrastructure

Development proposals will be expected to maintain, protect and enhance Monmouthshire's diverse green infrastructure network by:

a) Ensuring that individual green assets are retained wherever possible and integrated into new development. Where loss of green infrastructure is unavoidable in order to secure sustainable development appropriate mitigation and/or compensation of the lost assets will be required;

b) Incorporating new and /or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off-site.

NATURE CONSERVATION AND DEVELOPMENT

Policy NE1 – Nature Conservation and Development

Development proposals that would have a significant adverse effect on a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or on the continued viability of priority habitats and species, as identified in the UK or Local Biodiversity Action Plans or Section 42 list of species and habitats of importance for conservation of biological diversity in Wales, will only be permitted where:

a) the need for the development clearly outweighs the nature conservation or geological importance of the site; and

b) it can be demonstrated that the development cannot reasonably be located elsewhere.

Development proposals shall accord with nature conservation interests and will be expected to:

5) *Retain, and where appropriate enhance, existing semi-natural habitats, linear habitat features, other features of nature conservation interest and geological features and safeguard them during construction work;*

ii) Incorporate appropriate native vegetation in any landscaping or planting scheme, except where special requirements in terms of purpose or location may dictate otherwise;

iii) Ensure the protection and enhancement of wildlife and landscape resources by appropriate building design, site layouts, landscaping techniques and choice of plant species;

iv) Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 The combination of desk study and Extended Phase 1 Habitat survey identified a range of habitats at the candidate site and adjacent areas including improved grassland, arable field, poor semi-improved grassland, broad-leaved semi-natural woodland, dense scrub, running water and an extensive hedgerow network. The areas of grazed improved grassland and arable fields were considered of limited ecological importance and represent the area of the candidate site most suitable for any proposed development. Habitat features of ecological interest at the site including the hedgerow network, scattered trees, woodland corridors/edge, dense scrub and poor semi-improved grassland were considered suitable to support protected and priority species, potentially including foraging and commuting bats, nesting birds, Hazel Dormouse, Great Crested Newt and reptiles – for which further consideration and/or targeted survey work would be required as part of a future planning submission. [redacted] Many trees within, and immediately adjacent to the candidate site boundary were assessed to have potential to support roosting bats.

Badger

5.2 [redacted]

- [redacted]

[redacted]

[redacted]

Bats

5.6 The survey identified several trees with varying potential to support roosting bats including 9no. with a high potential, 12no. with moderate potential and at least 10low potential have been included in these figures, however there are a greater number of trees present within the site boundary and wooded strip that were inaccessible during the time of the survey. Any future development at the candidate site should seek to retain any trees identified as having potential to support roosting bats. However, given the current condition of some trees at the site (e.g. standing deadwood and trees with damage) some would likely need to be removed for development and/or H&S reasons – in this case further survey work (presence/absence surveys) would be required.

5.7 The best practice guidelines (BCT, 2016) recommend that for trees with high bat roost potential 3no. survey visits are undertaken between May – September comprising of at least one separate dusk emergence and dawn re-entry survey. For trees with moderate potential 2no. survey visits should be undertaken comprising of at least one separate dusk and dawn survey. Given that many of the trees are easily accessible a potential roost feature (PRF) inspection could be undertaken on all trees identified as having low, moderate and high potential to determine the presence/absence of roosting bats (dependant on health and safety restrictions). A PRF inspection would involve the use of tree climbing equipment/ladder and endoscope to physically inspect potential roost features for evidence of bats (e.g. live/dead bats, droppings and feeding remains). This survey can be undertaken at any time of year.

5.8 Trees assessed to have a low potential do not require any further survey work under the BCT (2016) guidelines. However, on a precautionary basis if any trees with low potential were to be removed as part of any future

development a prior inspection of potential roosting features would be undertake prior to soft-felling approach would be recommended. Trees should be section felled with cut tree limbs carefully lowered and left grounded overnight to allow any bats present to leave (Jackson, 2015).

5.9 The linear habitat features at the candidate site and wider survey area including the extensive hedgerow network, woodland corridor and woodland edge were considered likely to support a range of foraging and commuting bats species – the desk study returned an extensive list of bat field records within a 2km radius of the site. Given the scale of the candidate site further activity surveys (manual transects and automated surveys) would be required to establish how bats are using the candidate site to inform any mitigation/avoidance measures for a planning submission and to inform development layout. Based on the availability of suitable habitats at the candidate site the minimum level of survey recommended in the best practice guidelines (BCT, 2016) would be considered appropriate in the first instance to achieve a representative sample of bat activity across the candidate site[6]. This would comprise 3no. activity survey visits in spring, summer and autumn in appropriate weather conditions. Given the scale of the candidate site activity surveys are likely to consist of more than a single transect. Separate automated/static surveys (minimum one static per transect) would also be required, with each session recording for 5 consecutive nights *in situ* per season. The location of the static detectors (e.g. Anabat Express units) would be focused on the areas likely to be subject to development impacts (e.g. hedgerow removal).

5.10 The corrugated metal stable located in Field 1 was not accessible during the survey however, it was considered to be of negligible/low potential for roosting bats given the material, size and lack of external features noted (albeit from a distance). It is possible the structure may be used a night roost/feeding perch for a small number bats therefore it is recommended that an internal inspection of the building be undertaken. Further surveys may be required if the structure upon closer inspection reveals potential roosting features and/or evidence of bat use.

5.11 The design of any site lighting should also seek to reduce artificial light spill onto retained boundary habitats and linear features (e.g. hedgerows and surrounding woodland). These habitat features should be maintained as dark corridors for bats and other nocturnal wildlife. See lighting guidance note produced by BCT & ILP (2018) for advice on how to mitigate for impacts of artificial lighting on bats. Any future development proposal should also provision for the inclusion of bat boxes onto new residential units and retained trees.

[6] Further surveys may be required if these surveys reveal higher levels of bat activity than predicted.

Birds

5.12 The hedgerow network, scattered trees and areas of dense scrub and woodland at the candidate site were considered likely to support a number of foraging and tree/scrub nesting bird species, with the open areas of improved grassland and arable field considered suitable to support ground-nesting bird species. A number of old bird nests were noted within the tree canopies. Under the Wildlife and Countryside Act (1981) (as amended) all wild birds and their nests are protected against damage or destruction whilst in use or being built.

5.13 Given the high likelihood of ground nesting birds being present within the habitats at the candidate site further potential compensation/enhancement measures for the loss of ground-nesting bird habitats (i.e. arable field and improved grassland) should be considered at the design stage of any future development at the candidate site. This could include the inclusion of retained areas of open grassland (not publicly accessible) that would be managed to replicate farmland habitat i.e. strategic grazing.

5.14 Any future vegetation works (i.e. grassland and tree/scrub removal) would be subject to seasonal constraints and should be undertaken outside of the nesting bird season (undertaken between September – February). If this is not possible an ecologist should be present to inspect habitats for nesting birds prior to removal.

5.15 A number of the scattered trees at the site were also considered to be of some suitability to support Barn owl. In particular, the solitary standing trees assessed to have a high potential to support roosting bats were found to contain cavities of suitable size to support Barn owl (ca.80mm diameter) although no pellets or other evidence was noted around the trees during the current survey. The data search also returned records of nesting Barn owl within close proximity to the candidate site. As a Schedule 1 listed bird species Barn Owl is afforded more protection under the Wildlife and Countryside Act (1981) (as amended) meaning it is an offence to disturb any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young. It is recommended that a detailed walkover/scoping survey is undertaken to assess the suitability of trees at the candidate site for nesting Barn Owl. The findings of which would be used to determine if any further targeted survey work is required (e.g. nocturnal watches) and inform the development layout.

Great Crested Newt

5.16 Whilst no waterbodies are located within the immediate candidate site boundary, a review of OS mapping revealed the location of two ponds within 250m south of the site. No access was permitted at the time of the current survey. The candidate site was considered to offer some limited resources for Great Crested Newt in their terrestrial phase with the hedgerow margins and woodland. GCN are known to use terrestrial habitats up to 250m from breeding ponds (Langton *et al.,* 2001). The desk study identified two GCN records within

600m of the site and the pond cluster is also highlighted on the GCN and ponds connectivity plan prepared for the Monmouthshire County Council Ecological Connectivity Assessment (Gwent Ecology, 2010).

5.17 Great Crested Newt and their breeding and resting places are afforded legal protection under the Conservation of Species and Habitats Regulations (2017) and Wildlife and Countryside Act (1981) (as amended). As there is a low potential that GCN may be present within the habitats at the candidate site it is recommended that an initial Habitat Suitability Index (HSI) potentially followed by an eDNA survey is undertaken at the ponds located within 250m of the candidate site access permitting. An eDNA survey for GCN should be undertaken by a licensed surveyor during a single day time visit between mid-April to mid-June. Based on the eDNA survey findings, further survey work may be required at these ponds to establish the likely population size class assessment to inform any mitigation measures and licencing requirements at the candidate site. This would involve up to 6no. survey visits (e.g. torching, bottle trapping and egg search) between mid-March to mid-June.

Hazel Dormouse

5.18 Although the desk study did not return any records of Hazel dormouse within 2km of the candidate site, the species-rich hedgerows and woodland corridors at the candidate site and wider survey area were considered suitable to support the species. The candidate site is also located within the known range of the species (Bright *et al.*, 2006). Hazel dormouse and their breeding and resting places are also afforded legal protection under the Conservation of Species and Habitats Regulations (2017) and Wildlife and Countryside Act (1981) (as amended). Dependant on the likely impacts of any future development layout at the candidate site further survey work may be required to determine the likely presence/absence of Hazel dormouse and inform any appropriate mitigation/avoidance measures or licencing requirements.

5.19 Further surveys would involve the deployment of nest tubes along the hedgerow margins, woodland corridor and woodland boundaries at the candidate site. As per best practice guidelines (Bright *et al.*, 2006), nest tubes should be deployed in March/April and checked at monthly intervals for the presence of Dormouse up until November. A minimum of 50no. nest tubes should be deployed to sample a site. Given the scale of the candidate site it is likely >50 nest tubes will be required to achieve full coverage and demonstrate an appropriate survey effort.

Reptiles

5.20 The majority of the habitats at the candidate site and wider survey area were considered to have a limited potential to support common reptiles in their current use (grazed by livestock/arable). The grazed areas of improved grassland (in particular within the northern section of the site) lack any suitable cover or shelter for reptiles. However, the field margins of the arable fields-which are not currently managed and contain numerous

stones/boulders/rubble piles which have been ploughed from the fields, do provide some suitable habitat for reptiles although these features are relatively isolated within the agricultural/arable landscape. There are several Records of Slow-Worm were identified within 500m of the candidate site's boundary.

5.21 All UK reptiles are protected against intentional killing or injuring under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended). As such, it is recommended that the presence of reptiles is considered for any habitat management or enhancement work along the boundaries/field margins of the site. This could include, for example a supervised destructive search of rubble piles at a suitable time of year, the adoption of a phased, directional cutting methodology for any vegetation clearance and creation of habitat features as localised enhancements (e.g. log or brash piles).

Priority habitats

5.22 The candidate site contains an extensive hedgerow network. As priority habitats listed under Section 7 of the Environment Act (Wales) (2016) any future development at the candidate site should seek to retain hedgerow margins, where possible, or include the hedgerow network into the layout of any development design via a green-infrastructure management plan. This would also apply to broad-leaved woodland habitats at the candidate site which are also listed as priority habitats in Wales (as lowland mixed deciduous woodland).

Other considerations

5.23 As discussed in paragraphs 3.25-3.26 the small watercourses at the candidate site have existing hydrological links to the River Gavenny SINC and River Usk SAC SSSI. Any future development at the candidate site will need to take in consideration the potential for indirect impacts to designated sites such as changes to water quality through the discharge of surface water run-off during construction and operation.

Ecological Enhancements

5.24 Enhancement measures as part of any proposed development at the candidate site could include:

- The planting up of existing species poor/defunct hedgerows to create dense, species rich intact hedgerows using native species;
- Buffer planting between residential properties and retained hedgerows.
- The inclusion of bat and bird boxes onto new buildings and retained trees;
- The design of SuDS features to benefit biodiversity (e.g., attenuation features designed to hold water during most part of the year);
- The use of native tree and shrub species within any future soft landscape plan;

- The creation of a 130mm x 130mm gap at the bottom of garden and boundary fencing as to allow continued connectivity through the candidate site for Hedgehog and other small mammals[7];
- Installation of 'bee bricks' onto new buildings;
- Creation of reptile hibernacula using rubble/stones/felled/chipped material;
- Installation of Owl box on suitable retained trees;
- Sowing of native, locally sourced wildflower planting in suitable locations.

[7] Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: https://www.hedgehogstreet.org/

REFERENCES

Bat Conservation Trust (2016) *Bat Surveys – Good Practice Guidelines*. Bat Conservation Trust, London.

Bat Conservation Trust & Institution of Lighting Professionals (2018) *Bats and artificial lighting in the UK. Guidance Note 08/18*. Bat Conservation Trust, London.

Bright, P., Morris, P. and Mitchell-Jones, T. (2006) *The Dormouse Conservation Handbook: Second Edition*. English Nature, Peterborough

English Nature (2002) *Badgers and Development*. English Nature, Peterborough.

Froglife (1999) *Reptile Survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.

Gwent Ecology (2010) *Ecological Connectivity Assessments of Settlements in Monmouthshire*. Gwent Ecology, Monmouthshire.

Holdich D (2003) *Ecology of the White-clawed Crayfish*. Conserving Natura 2000 Rivers Ecology Series No. 1. English Nature, Peterborough

Institute for Environmental Assessment (1995) *Guidelines for Baseline Ecological Assessment*. E & FN Spon, Hong Kong.

Jackson, D. (2015) *Bats & Trees – Information Leaflet*. Bat Conservation Trust, London.

Joint Nature Conservation Committee (JNCC) (2010) *Handbook for Phase I Habitat Survey. A technique for environmental audit.* JNCC, Peterborough.

Langton, T. E. S., Beckett, C. L. and Foster, J. P. (2001) *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.

Monmouthshire County Council (2014) Adopted Local Development Plan (LDP) 20011-2021.

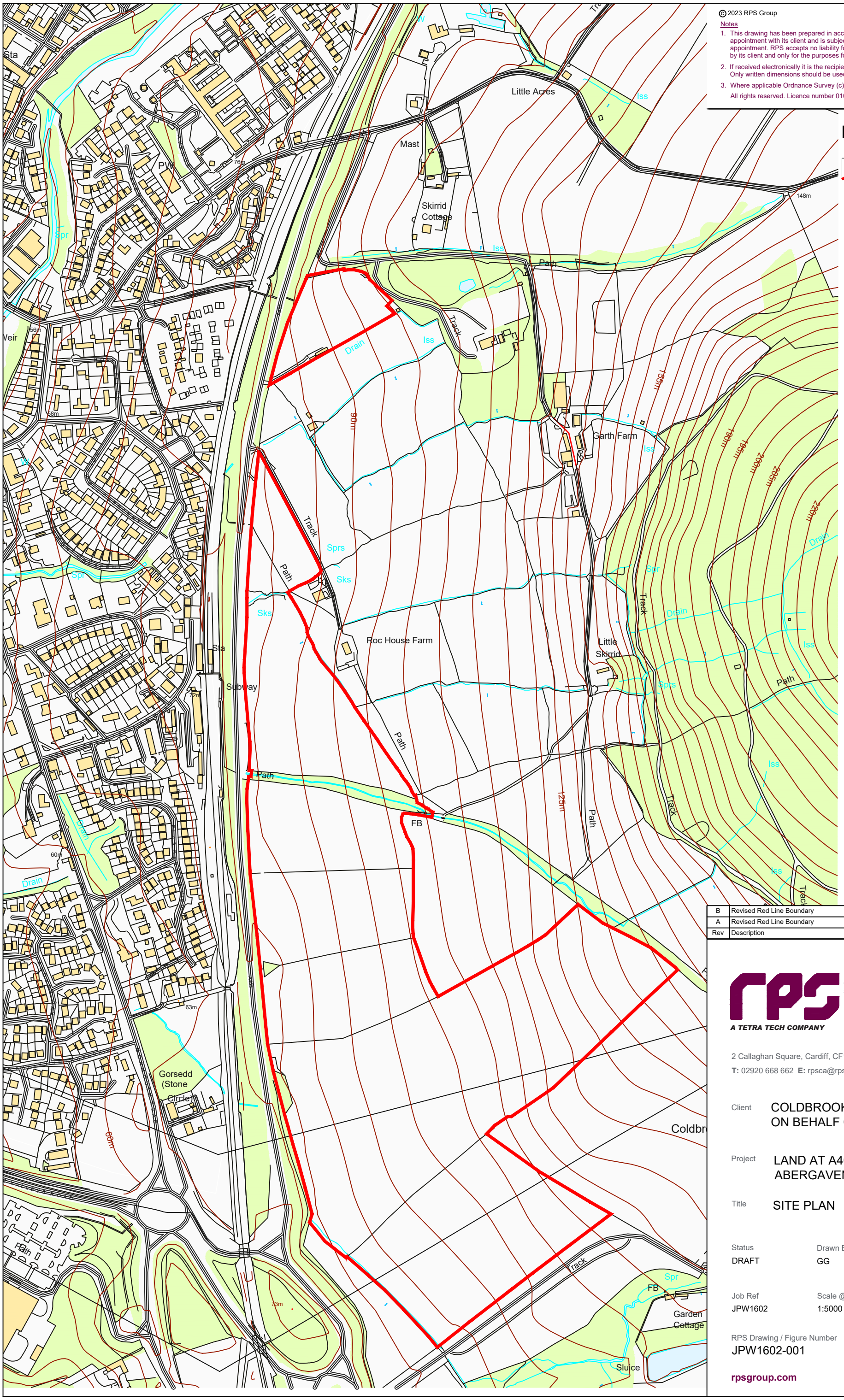
Natural England. (2013) Bat habitat assessment prior to arboricultural operations. Guidance for Natural Englands National Nature Reserves.

Soltys Brewster Ecology. (2021) *Monmouthshire Housing Association Preliminary Ecology Appraisal*. Report Ref: E2093401/DOC 01, Issue 3 Dated: August 2021

Welsh Assembly Government (2021) Planning Policy Wales Edition 11. February 2021.

Welsh Assembly Government (2009) Technical Advice Note 5: Nature Conservation and Planning.

APPENDIX I SITE BOUNDARY PLAN



© 2023 RPS Group

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.
3. Where applicable Ordnance Survey (c) Crown Copyright 2023
   All rights reserved. Licence number 0100031673

KEY

RED LINE BOUNDARY

N

Rev	Description	By	CB	Date
B	Revised Red Line Boundary	JRL	DP	24/01/23
A	Revised Red Line Boundary	GG	DP	22/07/21

rps MAKING COMPLEX EASY
A TETRA TECH COMPANY

2 Callaghan Square, Cardiff, CF10 5AZ
T: 02920 668 662 **E:** rpsca@rpsgroup.com

Client: COLDBROOK ESTATE ON BEHALF OF LANDOWNERS

Project: LAND AT A465, ABERGAVENNY

Title: SITE PLAN

Status	Drawn By	PM/Checked by
DRAFT	GG	DP

Job Ref	Scale @ A3	Date Created
JPW1602	1:5000	MARCH-2020

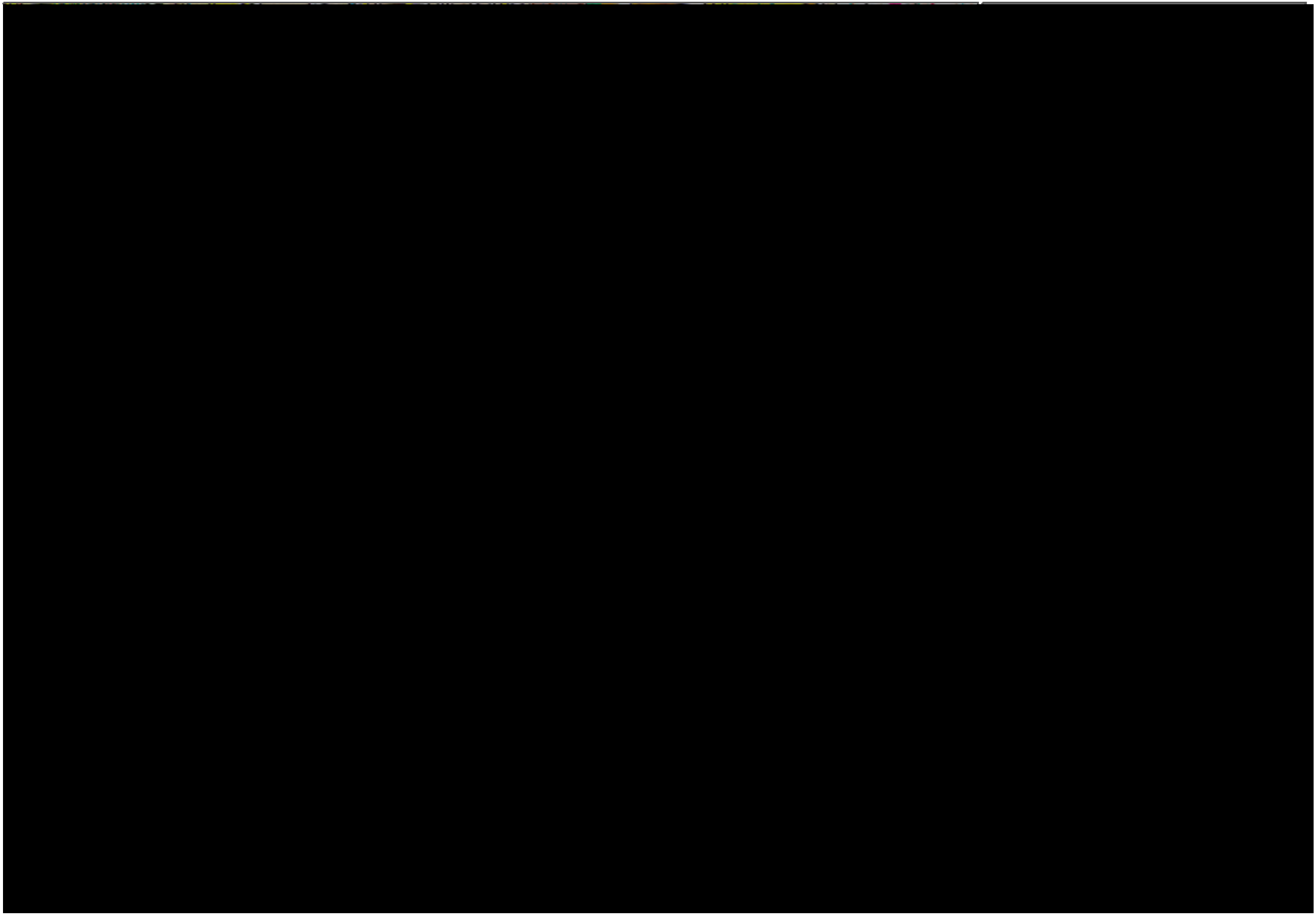
RPS Drawing / Figure Number: JPW1602-001

Rev: B

rpsgroup.com

W:\3900 Series\JSL3912 - RPS Graphics Support\JPW1602 - Land at A465, Abergavenny\1. RPS Drawings\DWG\JPW1602-001RevB_D_230130_Site Boundary Plan.dwg

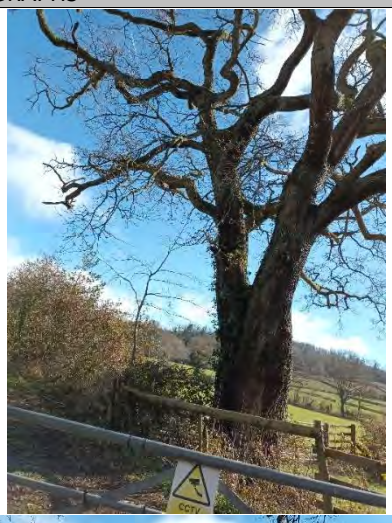
[redacted]



APPENDIX III 2023 PHASE 1 HABITAT MAP & TARGET NOTES

Land west of Abergavenny,
Site visit notes. Friday 10th March 2023
Weather-Snow in morning then became sunny, 5-10°C

Species noted during the visit: Mistle thrush *Turdus viscivorus*, Pheasant *Phasianus colchicus* (F), Buzzard *Buteo buteo*, House Sparrow, Tree creeper *Certhia familiaris,* Red Kite *Milvus milvus,* Coal tit *Periparus ater,* Blue Tit *Cyanistes caeruleus*, Blackbird *Turdus merula*, Robin *Erithacus rubecula*, Wren *Troglodytes troglodytes*, Magpie *Pica pica*, Rook *Corvus frugilegus* and Carrion Crow *Corvus corone*
Mole hills, Badger sett (and footprints),

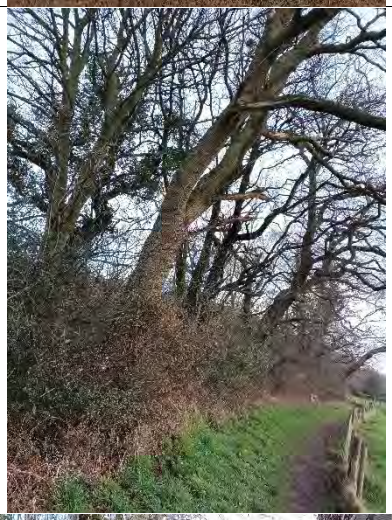
TN	PHOTOGRAPHS	DESCRIPTION
1		Mature Oak in northern corner of the adjacent field next to the entrance of Field 1. Several woodpecker holes noted. Large cavity present. **High bat potential**
2		Field 1. Access was not possible due to a locked gate. Single storey, corrugated metal stable with horse present during the survey-considered to have negligable bat potential. Improved grassland (grazed) with a dirt access track. Woodland to the north and west of the field.
3		Roadside outgrown hedge/broadleaved woodland along western side of Field 1. Semi mature/mature trees noted include Ash, Sycamore, Oak. Dense bramble undestorey. Laurel noted within the vegetation. Trees low potential given the presence of dense ivy. Likley to be used for foraging/commuting bats/nesting birds.

4		Field 2 Horse grazed improved grassland. Water collects in the southern part of the site and flows into a culvert located in Field 3. Hedgerow along the north eastern boundary is approximatley 1.5m high and is managed to a uniform height. Hedges/trees likley to be used for foraging/commuting bats and nesting birds.
5		Area of woodland has development along the western side of Fields 2/3. Tree species noted include Oak, Ash, Sycamore, Hazel, Willow, Field Mapel. Former hedge has become outgrown and self sown trees including Ash have established with a largely bramble understory,. Other species noted include Lords and Ladies, Male Fern. Hedges/trees likley to be used for foraging/commuting bats and nesting birds. Birds' nest noted in the trees.
6	 	Western boundary of Field 3. Wooden fence present. Bramble undertsory with several semi mature trees present. Species noted include Beech, Ash, Sycamore. Some Trees are likley to have been planted along the roadside verge given their uniform age and structure. Hedges/trees likley to be used for foraging/feeding/commuting bats and nesting birds. Several mature trees present. **Low bat potential-dense ivy covering preventing full inspection.**

7		Field 3 Dilapitated corrugated metal shed with Willow tree entangled into it. **Moderate bat potential**
8		Field 3 Culvet in north western corner of field. Drainage ditch flowing from east to west. Outgrown, species rich hedge along northern boundary between field 2 & 3. Hazel, Holly, Willow with bramble scrub understory.
9		Storm damaged Ash in hedge. Limb tear present. Regrowth has naturally occurred. **Low bat potential.**
10		Eastern hedge along Field 3. Managed to a height of approximatley 1.5m- Hazel, Hawthorn, Holly. Wet ditch runs length of the hedge into northern part of Field 3. 2 Mature Oaks within the hedge-Several rot holes and split branches present. **Low bat potential.**

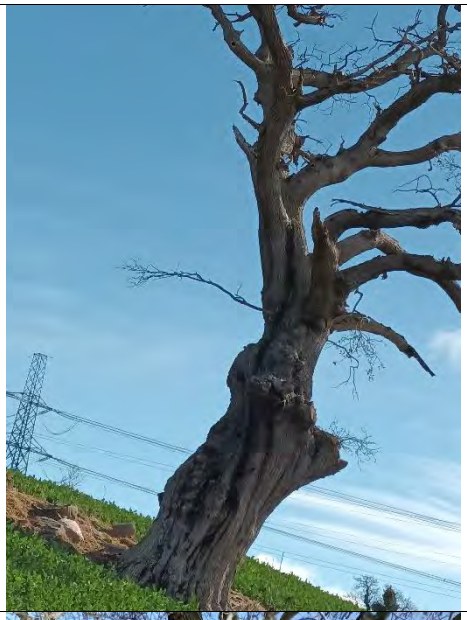
11		Outgrown, intact species rich hedge. Species noted include Ash, Hazel, Holly, Blackthorn with a bramble understorey. Self sown saplings also present.
12		Improved grassland-sheep grazed fields to the east of Fields 3 (outside red line boundary). Post and rail fence present with managed Hazel, blackthorn, Hawthorn hedge.
13		Wooded stream corridor running from the east to west. (Also a PROW). Several mature trees including Oak, Ash, Willow, Field maple, present with Hazel, Holly understory. Other species noted include Harts tongue fern, Male fern and Lords and Ladies. The stream during the survey was fast flowing in parts, shallow and did not contain any submergent vegetation during the survey, but did contain leaf litter.
14		Several mature Ash and Oaks trees within the woodland strip. Numeours cracks, splits limbs, limb tears present. Moderate/High bat potential.

15			Ash within woodland strip. Dense ivy present. Low bat potential.
16			Mature Oak within woodland strip. Limb tear near top of tree. Numeorus cracks/splits noted on upper limbs. Moderate bat potential.
17			Some trees were inaccessible during the survey, therefore not all have been fully assessed. Mature Ash on other side of wooded embankment. Ivy present. Limb tear noted towards the top. Moderate bat potetial.

18		Mature Oak. Numeorus limb tears/splits cracks present. Moderate bat potential.
19		PROW running alongside wooded stream on the left. Field 4 is present on the right side of the picture and it fenced with post and rail fencing.
20		PROW access from road. Non native Daffoils present.
21		Field 4 Arable field. Well managed hedge present on eastern and southern boundary. Boundary on the western side is consistent with the rest of the western boundaries. Out grown hedge with trees.

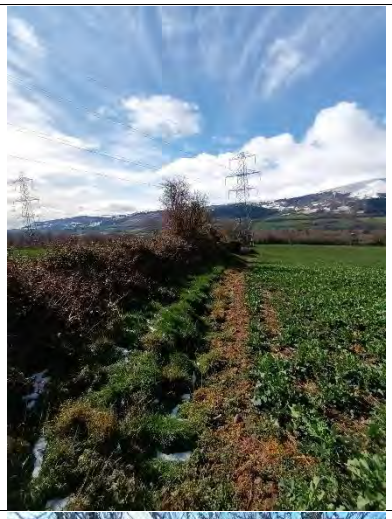
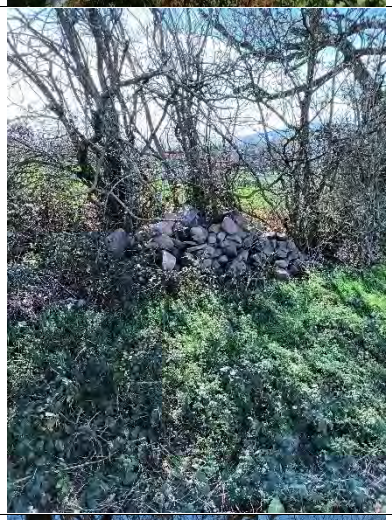
22		Field 5 Arable field. Intermittent hedge along northern/southern bounday. Western boundary consistent with the other roadside boundaries-scrub/outghrown hedge although the tree cover is less compared to the areas to the north and south. Mature Oak present in the centre of Field 5. Large cavity in lower section of the trunk. **High bat potential.** **Also potential bird nesting opportunities.**
23		Area of woodland between fields 5 & 6. Species noted in clude Ash and Beech. Section of western boundary has been managed in line with the overhead cables. No obvious potential roosting features noted. Negligable potential for roosting bats however likley otbe used for foraging/commuting.
24		Oak tree within hedgerow between fields 5&6. Large knot hole present, with cracked raised bark noted on the upper limbs. **Moderate bat potential.**

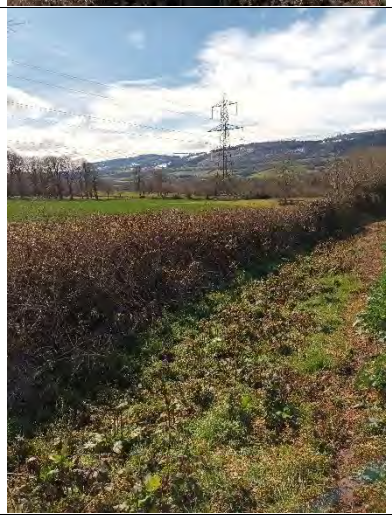
25	 	2 Mature Ash located next within the managed hedgerow between fields 6&7. Cavities/limb tears present approximatley 2.5m from ground. Dense ivy present. **Moderate bat potential**
26		Field 7- Arable field Intermittent hedge along northern boundary interspersed with semi mature/mature trees.

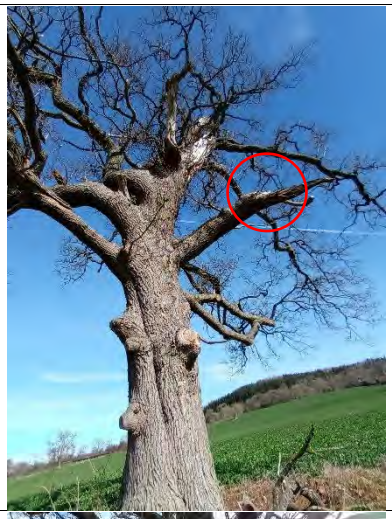
27		Dead tree located in field 7. Numerous rot holes/woodpecker holes, cracks/splits. High bat potential. Potential for nesting birds.
28		Mature Ash located within the adjacent field to the north of Field 7. Several cavities present/ Cracked bark and limb tear also noted. Moderate bat potential.
29		Eastern boundary of Field 7. Continuation of wooded stream running along the eastern boundary. Several mature trees present within the fenced woded stream, bramble scrub understorey present. Consistent with remainder of wooded stream.

30		2 Mature Ash present within the fencline of Field 7. (view looking north) **Negligable bat potential.**
31	 	3 dead/dying Oak and Ash present on field boundary with adjacent field to the south /east of field 7. Nuemrous rot holes/cavities, limb tears present. **High bat potential.**

		
32		Dead on south eastern boundary of Field 7. Dense ivy present, limb tear and cavity also noted. **High bat potential.**
33		Dead hollow Oak tree on south eastern boundary of Field 7 (outside fence line) Limb tears and dense ivy present. **High bat potential.**

34		Southern hedge of Field 7- consists largely of bramble scrub, itermittent along the length. Gorse present towards central section of the hedge near the pilon.
35		Stone rublle piles located on boundary between Fields 7 &8. Outgrown hedge present consitisting of Hazel, Ash and Holly.
36		Mature Ash present in hedge betwenen field 7&8. Some cavities present in upper limbs, but these appear to be shallow. **Low bat potential.**

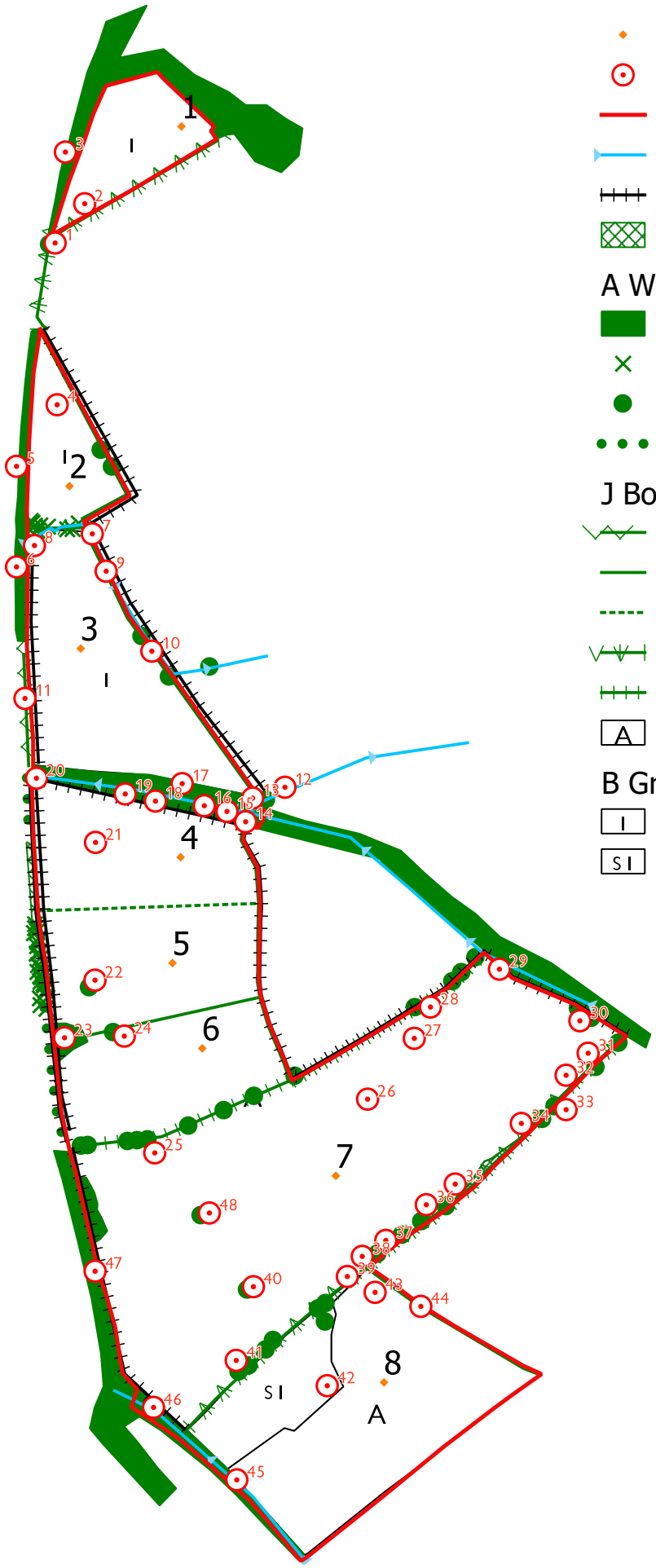
37			Dead tree with numeours cavities, cracks present. **Moderate potential.**
38			Mature Ash. Limb tears, cavities present. **Low bat potential.**
39			Bramble scrub hedge intermittent with trees between Fields 7&8.

40			Large Oak in centre of Field 7. Large limb tear on eastern facing side. **Low bat potential.**
41		 	2 Mature Oak in scrub on southern boundary. Large cavity present from base on one of Ash trees. Numeours limb tears and cavities present. **Moderate bat potential**

42		Field 8 Mainly arable with area of poor semi-improved grassland in northern corner of Field. Compact Rush noted, Selfheal, bush vetch noted. Outgrown hedge present on the northern side of Field 8. Hazel, Holl, Ash present with bramble scrub understory.
43	 	Dead tree present in the eastern part of Field 8. Dense bramble around base. Several cavities present and it appears to be hollow from the top. **High bat potential.** **Potential for nesting birds.**

44			Managed hawthorn hedge along eastern boundary of Field 8.
45			Wooded stream present on western boundary of Field 8. No submergent vegetation. Brambel understory with Mature Beech, Ash, Holly and Hazel present. Ground flora noted includes: Hogweed, Hemlock water dropwort, Dandelion, Male fern, Lords nad Ladies and dock sp.
46			Woodland strip on western boundary of Field 7. Species noted include Ash, Hazel, Silver birch, Holly with bramble understory. Relitively uniform height and size. Likley to have been planted along the roadside verge with self sown saplings also establishing.

47		Section of hedge/trees cut for overhead lines.
48		Mature Oak in middle of field 7. Large limb tear present. Cracked bark and crevices present. **Moderate bat potential.**



- Field no.
- Target Notes
- Site Boundary
- G2 Running Water
- J2.4 Fence
- A2.1 Dense/Continuous Scrub

A Woodland and Scrub

- A1.1.1 Broad-leaved Semi-natural Woodland
- A2.2 Scattered Scrub
- A3.1 Scattered Broad-leaved Trees
- A3.1 Line of Broad-Leaved Trees

J Boundaries and Miscellaneous

- J2.1.1 Intact Species-rich Hedgerow
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J2.3.1 Species-rich Hedgerow with Trees
- J2.3.2 Species-poor Hedgerow with Trees
- [A] J1.1 Arable

B Grassland and Marsh

- [I] B4 Improved Grassland
- [SI] B6 Poor Semi-improved Grassland

PRELIMINARY | PLANNING | DESIGN | TENDER | CONSTRUCTION

Coldbrook Estate

Land East of Abergavenny

2023 Phase 1 Habitat Survey

E23115301 KG MW 24 March 2023

soltysbrewster

4 Stangate House Stanwell Road Penarth Vale of Glamorgan CF64 2AA

Telephone:- 033 00 13 00 12

e-mail:- enquiry@soltysbrewster.co.uk

Soltys Brewster Ecology is the trading name of Soltys Brewster Ecology Ltd. Registered Offices:- 4 Stangate House, Stanwell Road, Penarth, Vale of Glamorgan. CF64 2AA. Registration No. 5779051.
Dimensions should not be scaled from this drawing, only figured dimensions are to be used. All discrepancies or queries regarding this drawing should be referred to Soltys Brewster Ecology Ltd. Soltys Brewster Ecology Ltd accept no liability for any expense, loss or damage of whatever nature and however arising from variation made to this drawing or in the execution of the work to which it relates which has not been referred to them and their approval obtained.

APPENDIX IV LDP CANDIDATE SITE ASSESSMENT FORM

Local Development Plan
Ecological Site Assessments in Monmouthshire
2023

1 Introduction

To inform the allocation and deliverability of candidate sites through the LDP process in line with relevant policy and legislation, Monmouthshire County Council requires the submission of baseline ecological information. This methodology has been prepared in order to ensure that there is a consistent approach to this submission and that the quality of the information provided is adequate.

Site Appraisals shall be presented in a report and describe the existing ecological value of the proposed LDP sites, principally based on botanical survey but with consideration of other potential Protected or Priority species that may be present. Sites must be also assessed for their potential to qualify wholly or in part as Sites of Importance for Nature Conservation (SINCs) using the Guidelines for the Selection of Wildlife Sites in South Wales adapted for Monmouthshire (Available on the Monmouthshire County Council Website).

Following the site appraisal, an evaluation of status or potential impact on the biodiversity of the site must be made and classified as either: High, Medium or Low value. This status will be quality assured and checked by Monmouthshire County Council through the Candidate Sites Assessment Process prior to the Deposit Plan.

Information gathered from the Monmouthshire County Council Connectivity Assessment (available on the Monmouthshire County Council Website) will also need to be used to help inform the overall value of the proposed LDP Candidate Sites.

In addition to this, GIS (Geographical Information Systems) data in the format of shape files should be provided to provide visual representation of the ecological status of each site. (A guidance note on this requirement is available on the LDP webpages relating to the ecological site assessments of Candidate Sites on the MCC website.)

2 Requirements for LDP Candidate Site Assessment

Due to the large number of candidate sites proposed, Monmouthshire County Council requires a consistent approach to ecological data gathering and summarisation. All Appraisals must comply with the CIEEM Guidelines for Preliminary Ecological Appraisal and be undertaken and reviewed by CIEEM members only. All appraisals must include a summary sheet to be used by the LPA (template included at the end of this document). **The LDP should be based on robust evidence and our expectation is that this guidance is followed.**

It is strongly recommended that ecological information is submitted during the second call for candidate sites in late 2019.

2.1. Desk-Based Study

The desk based study shall be based on the following as a minimum:

- A 1km SEWBReC data search for Protected and Priority Species
- A 1km SEWBReC data search for existing designations including SACs, SPA, Ramsar site, SSSIs, Local Wildlife Sites, Sites of Importance for Nature Conservation. This must include 'reasons for designation' for LWS/SINCs.
- Use of the Ancient Woodland Inventory to identify woodland designations ASNW, PAWS etc.
- Identification of whether the site falls within the Juvenile Sustenance zone[1] for the Wye Valley and Forest of Dean Bat Sites SAC*
- Review of any previous walkover undertaken for the adopted LDP – information is available on the MCC LDP webpages
- Review of the Monmouthshire Ecological Connectivity Assessment[2] to assess the context of the candidate site in providing ecological connectivity- information is available on the MCC LDP webpages
- Appraisals will be expected to consider any relevant ecological records that have been previously generated by studies to inform planning undertaken on or near the sites.

[1] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost (SSSI)
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost (SSSI)
[2] Ecological Connectivity Assessment of Settlements in Monmouthshire Report, 2010

2.2. Field Assessments

The optimum period for the assessment of biodiversity and habitats is between the months of April -July. Sites to be surveyed according to the methodology detailed in the 'Handbook for Phase 1 habitat survey' . The following details and features must also be noted:

- Habitats present and features of nature conservation interest including Priority Habitat (Section 7 Habitat[3])
- Protected or Priority (Section 7) species - signs indicating presence and potential for the habitat to support such
- Site of Importance for Nature Conservation – assessment of the condition of the site with respect to its potential to qualify as a SINC
- Consideration of all hedgerows in the context of the Hedgerow Regulations 1997.
- Veteran trees - presence of over-mature trees
- Consideration of the value of the site in terms of habitat connectivity / ecosystem resilience using best available guidance
- Requirements for further ecological survey.

2.3. Expertise of consultants

The information will need to be prepared and reviewed by an appropriately experienced ecologist that is a member of the Chartered Institute of Ecology and Environmental Management.

2.4. Biodiversity Evaluation

Using the results of the desk-based survey and field assessments, an evaluation of status or impact of the biodiversity of the site shall be made and classified as either: High, Medium or Low value.

2.5. SINC Identification

Local Development Plan Candidate Sites must be assessed against the criteria in the '*Guidelines for the Selection of Wildlife Sites in South East Wales*' which have been adapted for Monmouthshire.

[3] Environment (Wales) Act 2016

3. Summary of Outputs

The following will be expected to submitted to the LPA during the second call for sites in Autumn 2019.

3.1 Preliminary Ecological Appraisal Report (PEAR)

A Preliminary Ecological Appraisal Report (PEAR) in accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal / Guidelines for ecological report writing.

3.2 Site summary form

A Site Summary Form shall be completed for each Candidate Site based on both field survey and desk-based assessments. A blank Site Detail Form and accompanying explanatory notes are provided in Annexes 1 & 2.

3.3 Site Values

For all sites, the **overall value** for biodiversity will need to be defined (see evaluation criteria below). Monmouthshire County Council may adjust this value depending on further ecological survey and evidence prior to the Deposit Plan.

3.4 SINC Assessment

Candidate sites/parts of sites must be considered for the potential for them to be of SINC quality. If the site, or part of the site meets the SINC criteria, please contact the LPA Biodiversity and Ecology team to discuss how data shall be presented. Designation will be thereafter undertaken by the SINC expert panel[4].

3.5 GIS information

The ecological status of the site will need to be digitised using GIS (Geographical Information Systems) in the format of shape files. A guidance note and template GIS shape file will be available on the Monmouthshire LDP website on the LDP page relating to the ecological site assessments of Candidate Sites. This shall include the format that digitisation will need to take.

[4] SINC Expert Panel includes Monmouthshire County Council, Gwent Wildlife Trust, Natural Resources Wales and Monmouthshire Meadows Group.

4. Evaluation Criteria

Sites must be evaluated using the following criteria drawn together using the methodology for the adopted Local Development Plan, Ratcliffe Criteria[5] and Local Wildlife Site guidelines[6]. The evaluation will be checked and quality assured by Monmouthshire County Council. **Deliberate underestimation of site value could jeopardise the sites inclusion in the deposit plan.**

HIGH (Red)

- Candidate Site includes land designated as SAC/SPA/Ramsar/SSSI
- Site within the Juvenile Sustenance Zone[7] of a Wye Valley Forest of Dean Bat Sites SAC Maternity roost SSSI
- Site wholly designated as Local Wildlife Site/SINC/ASNW
- Site identified as Site of Importance for Nature Conservation (SINC) quality during field assessment
- Site is in the majority (>50%) composed of Priority Habitat(s) (Section 7) Environment (Wales) Act 2016
- Site of existing value for connecting semi-natural habitats in the landscape which is considered to be critical in the context of a protected species or protected site
- Protected species recorded on site to an extent that development will not be possible

MEDIUM (Orange)

- Site close / adjacent to a SAC/SPA/Ramsar/SSSI/LWS/SINC/ASNW
- Site habitat(s) close to SINC quality but threshold for designation not reached
- Part of the site includes habitats that meet LWS / SINC threshold
- An already designated LWS/SINC present within a candidate site of overall lower biodiversity value
- Presence of Priority Habitat (Section 7) within the candidate site (except hedgerow)

[5] Ratcliffe, 1977
[6] South Wales Wildlife Sites Partnership, 2004 (as amended)
[7] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost (SSSI)
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost (SSSI)

- ‘Important’ hedgerow/s present
- Veteran / over mature tree(s) present
- Site of existing value for connecting semi-natural habitats in the landscape as identified in the ecological connectivity assessment and/or during field surveys.
- Protected species recorded / reasonable likely to be found on site but unlikely to prevent development if appropriate mitigation and compensation provided
- Site within the Juvenile Sustenance Zone[8] of a Horseshoe Maternity roost (not designated).

LOW (Green)

- Site not near any protected sites SAC/SPA/Ramsar/SSSI/LWS/ANSW
- Site assessed as not of SINC quality
- Limited or no features of biodiversity interest
- No priority habitats on site (with the exception of hedgerows)
- Site of very limited value for connecting semi-natural habitats in the landscape
- No protected species on or near site

[8] Lesser horseshoe roost Juvenile Sustenance Zone = within 600m of a maternity roost
Greater horseshoe roost Juvenile Sustenance Zone = within 1km of a maternity roost

Annex 1

Reference No: CS/0125

Site General Information	
Name: Land East of Abergavenny	Grid Reference: SO3079 1348
Current land use & management: Farm/Cropland	Size: 31Ha
Proposed use: Mixed Use Development	Form Completed by: [redacted]
Overall Site Evaluation: **MEDIUM**	

Site Summary Table

Statutory Designated Site(s)	**adj**	Section 7 Habitat(s)	**part**
SAC Juvenile sustenance zone	**no**	Protected Species	**yes**
Non Statutory Designated Site(s)	**adj**	Section 7 Species	**yes**
SINC Recommendation	**no**	Ecological Connectivity	**conn**
SEWBReC unique data code:			

Statutory Designated Sites

Is the site within or adjacent to an International or European Designated Site? (Special Protection Area, Ramsar Site or Special Area of Conservation) *(Underline the relevant designation)*

Whole of site	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
Within 1km buffer	
No	

Is the site within or adjacent to a Nationally Designated Site? (National Nature Reserve or Site of Special Scientific Interest) *(Underline the relevant designation)*

Within	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
No	

Juvenile sustenance zones - Is any part of the site within 1km of a greater horseshoe bat roost SSSI or within 600m of a lesser horseshoe bat roost SSSI?

Greater Horseshoe	
Lesser Horseshoe	
Distance from roost (m)	
No	✓

Non Statutory Designated Sites

Is the site within or adjacent to a pre-designated Locally Designated Site? (Local Wildlife Site / Site of Importance for Nature Conservation or Ancient Semi Natural Woodland)

Within	
Part of site	
Directly adjacent/within 250m buffer	
Within 500m buffer	✓
No	

List All Relevant Statutory and Non Statutory Designated Sites identified by the desktop study:

River Usk SAC & SSSI

River Gavenny SINC

SINC Recommendation

Is the whole site or part of the site of SINC (LWS) quality? *(underline whole or part as appropriate)*

Yes		Whole		Part	

Qualifying criteria	

Borderline	
No	✓

Has the Monmouthshire County Council Biodiversity & Ecology Team been contacted to discuss what further information may be required?

Yes:		No:	✓

Date:	

Priority Habitats and Important Features

Phase 1 Habitat	Wales Priority Habitat (Section 7)	% of whole site
J2.1.1 Intact Species-rich Hedgerow	Hedgerows	<1%
J2.1.2 Intact Species-poor Hedgerow	Hedgerows	<2%
J2.2.1 Defunct Species-poor Hedgerow	Hedgerows	<1%
J2.3.1 Species-rich Hedgerow with trees	Hedgerows	<1%
J2.3.2 Species-poor Hedgerow with trees	Hedgerows	<1%
G2 Running Water	Rivers, Streams, Ditches	<1%

Are there any **veteran trees or over-mature trees** on site?

Yes ✓ No ☐

If 'Yes' how many and what species?

At least 15no. veteran Oak and Ash around the site boundary.
Wooded stream contains at least 15 mature Ash, Oak.

Does the site have any **hedgerows**?

Species-rich (high) potential Hedgerow Regs Quality	✓	Length (m) **116**
Species-poor (medium) Has some potential	✓	Length (m) **2224**
Species-poor (low)	✓	Length (m)

Single species dominant AND Gappy		**479**
No		

Does the site have any **water features** present?

Ponds	
Streams	✓
Ditches	✓
Other:	
No	

Ecological Connectivity

Adjacent Land Uses & Habitats

A465 corridor
Ysgyryd Fach/Skirrid Fach/Woodland at Coldbrook Park
Arable field and farmland

Does the site have any ecological connectivity value to either adjacent habitat or the wider landscape?

Critical connectivity:		Existing Connectivity	✓	No connectivity:	
		Connectivity Opportunity:	✓		

Protected Species

Have protected species been recorded at the site / reasonably likely to be present at site?

Confirmed ✓ Reasonably likely ☐ No and unlikely to be present ☐

List Species: SEWBReC record	Evidence of presence on site (seen directly or field signs)	Potential to be present on site (habitat and location mean that it is likely)
[redacted]	[redacted]	[redacted]
Great Crested Newt 2no. records within 600m of the candidate site (dated 2007). A further 7no. records within 2km of the site.	Two off-site ponds within 250m of the candidate site. (Coldbrook Park) Sub-optimal terrestrial habitat identified at the candidate site (hedgerows, woodland, poor semi improved grassland and arable field margins)	**Low**
Bats 172no. records of foraging and commuting bats within 2km of the candidate site. A Single Soprano pipistrelle record was retuned from within the site boundary. Lesser horsehose bat, Nathusius pipistrelle, serotine, noctule, Daubenton's and other myotis bats recorded in wider area. Roosts for common/soprano pipistrelle, natterer's bat, whiskered bat and LHS within 1km of the site.	Linear habitat features at the site (hedgerows, woodland corridor and edge and stream) considered likely to support a number of foraging and commuting bat species. 9no. trees with high bat roost potential, 12no. trees with moderate and at least 10 trees with low potential (those accessible/visible during the survey)	**High**
Hazel Dormouse No SEWBReC records within 2km.	Extensive hedgerow network and woodland corridors considered suitable to support dormouse;	**Low**

	structurally suitable. Species-poor, defunct hedgerows of lower suitability.	
Reptiles 5. slow-worm records within 2km search radius, nearest located within 500m of the northern site boundary.	Majority of habitats (i.e. improved grassland and arable field) generally considered unsuitable. However, the candidate site contains an area of poor SI grassland in the southern part and the arable field margins are currently not managed and contain stone/rubble, potentially providing suitable habitat although these feature relatively isolated in agricultural/arable landscape. .	**Low**
White-Clawed Crayfish No SEWBReC records within 2km. River Gavenny SINC designation description references presence of white-clawed crayfish.	Streams at site are narrow, slow-flowing and generally have a shallow water depth (<20cm). Unlikely to support a long-term crayfish population.	**Negligible**
Otter & Water Vole Otter sighting over 500m west of the candidate site at the River Gavenny and River Usk. No SEWBReC records for water vole within 2km.	Streams at site are narrow, very shallow and lacking any bankside vegetation suitable for otter or water vole. Unlikely to contain sufficient prey resources for otter.	**Negligible**
Birds Red Kite, Barn Owl, Peregrine, Redwing, Fieldfare, Common Crossbill Brambling, Goshawk, Hobby and Golden Oriole recorded within 2km search radius.	Candidate site contains a number of mature trees with cavities suitable for nesting barn owl.	**Low**

Priority Species

Are there records for Priority (Section 7) Species (not included above)?

Yes ☑ Potential ☐ No ☐

List Species: SEWBReC record	Evidence of presence on site (seen directly or field signs)	Potential to be present on site (habitat and location mean that it is likely)
Birds Cuckoo, Linnet, Spotted Flycatcher, Skylark, Curlew, Tree Pipit, Kestrel, Wood Warbler, Marsh Tit, Hawfinch, Yellowhammer, Yellow Wagtail, Willow Tit, Lesser Redpoll, House Sparrow, Dunnock, Song Thrush and Nightjar recorded within 2km of the site.	Number of bird nests noted in tree canopies during the survey. House sparrow observed during the phase 1 survey. Open areas of improved grassland and arable fields considered suitable to support ground-nesting birds (e.g. Skylark).	**Confirmed**
Mammals Records of hedgehog, polecat, stoat and weasel within 2km search radius. Single Weasel record from within the site boundary.	Habitats at the candidate site likely to support foraging small mammals in particular the field margins, hedgerows and woodland.	**High**

Conclusions

What additional ecological surveys/assessments will be required?

To determine if the site could be allocated for the purpose identified	Prior to the submission of planning application to influence site design etc. • Great Crested Newt (eDNA) • Bats (activity transects, automated monitoring and emergence/re-entry, Physical check of PRF's) • Hazel Dormouse • Barn Owl • Reptiles • Badger

Summary of potential biodiversity constraints

[redacted]

Hedgerows, woodland and scattered trees with potential to support foraging and commuting bats and nesting birds.

9no. trees with high potential to support roosting bats, 12no. with moderate and 10no. with low potential.

Open areas of improved grassland and arable field with potential to support ground-nesting birds.

Scattered trees at the site of some suitability to support nesting Barn Owl.

Low potential to support GCN. 2no. off-site ponds within 250m of the candidate site. Sub-optimal terrestrial habitats at the candidate site.

Low potential to support common reptiles. Areas of poor semi-improved grassland/arable field margins provide suitable habitats.

Extensive hedgerow network and woodland parcels considered suitable to support hazel dormouse, species-poor defunct hedgerows of low suitability.

Presence of veteran and over-mature trees. **Presence of priority habitats; including an extensive hedgerow network and streams.** **Streams at the candidate site have hydrological links to River Gavenny SINC.**

Recommended avoidance / mitigation / compensation measures

Retain and enhance priority habitats (hedgerow network and streams) where possible. Retain trees with potential to support roosting bats where possible. Retain veteran/mature trees Maintain dark corridors along retained hedgerow network and other linear habitat features On-site or off-site habitat management for ground-nesting birds

Enhancements that could be delivered through development including ecological connectivity opportunities

New native tree and shrub planting to strengthen/enhance defunct hedgerow boundaries. Additional buffer planting to protect retained hedge network Provision of bird and bat boxes into new residential units Incorporating a small gap at bottom of garden and boundary fencing to ensure connectivity for Hedgehog and small mammals Adoption of green-infrastructure management strategy for the site Enhancements for invertebrates e.g. bee bricks, wildflower planting.

Annex 2: Notes to Accompany Site Detail Form

Monmouthshire County Council reserve the right to amend any Site Detail Form upon detailed consideration of the site and quality assurance of the information submitted.

Site General Information

Site reference number, name, National Grid Reference, size (ha) and proposed use. 'Current Use & current management' describes the use of the site at the time of surveying and how it appears to be managed.

Overall Site Evaluation

To be completed based upon Section 4 of this guidance. One of the evaluation categories can be chosen i.e. **High** / **Medium** / **Low**. This evaluation could be subject to change upon consideration of the site and quality assurance by Monmouthshire County Council.

Summary Table

The summary table gives a quick reference guide to the ecological constraints of the site.
Protected sites are considered on page ii of the form. The summary needs to show an existing protected site (**yes**), adjacent sites within 250m (**adj**) adjacent sites within 500m (**adj**) and no protected sites within 500m (**no**). Note that development can potentially affect protected sites that are further than 500m away.

The potential for consideration of horseshoe bat SAC juvenile sustenance zones is considered on page ii of the form. The summary should address whether the site falls within the site buffers (**yes**) or not (**no**).

Non-statutory sites are considered on page iii of the form. The summary needs to show an existing site (**yes**), adjacent sites within 250m (**adj**) adjacent sites within 500m (**adj**) and no protected sites within 500m (**no**).

SINC recommendation is shown on page iv of the form. The table indicates whether the whole site is recommended for SINC designation (**yes**), part of the site is recommended for SINC designation (**part**), the site may meet the criteria following further survey and examination (borderline site – **bord**), or the site is not recommended for SINC designation (**no**).

Wales Priority Habitat (Section 7) is considered according to the table on page v of the form. This shows whether these habitats cover over 50% of a site (**yes**), less than 50% of a site (**part**) or are not present (**no**).

Projected and Priority species are considered on page vii of the form. Presence (**yes**), reasonable likelihood of presence / possible presence (**poss**) and likely absence (**no**) of Protected and Priority species are indicated in the summary table.

Ecological connectivity is considered on page vi of the form. The summary table indicates the importance of that connectivity from critical (**crit**), some (**conn**), to no connectivity (**no**).

Statutory Designated Sites

The information regarding designated sites shall be obtained via SEWBReC. Some interpretation of that data will need to be undertaken to establish the proximity of sites to Juvenile Sustenance Zones for horseshoe bats associated with the Wye Valley and Forest of Dean Bat Sites SAC (maternity roost SSSIs). The juvenile sustenance zone for Greater

Non Statutory Designated Sites

The information regarding SINCs/LWS sites shall be obtained via SEWBReC (site name and reason for designation). Detailed site designation forms (recommended for sites within 250m of the Candidate Site) will be available from Monmouthshire County Council (SINCs) and Gwent Wildlife Trust (LWS).

Designated ancient woodland is defined as ancient semi-natural woodland (ASNW) – areas that have been wooded since at least 1600. ASNW is listed on Ancient Woodland Inventory 2011 and available on the Lle website. However, in Monmouthshire, a large number of ASNW are designated as SINC and shall therefore be generated during the above data search.

SINC Recommendation

This section indicates whether the whole site or part of the site meets the criteria for SINC designation in Guidelines for the Selection of Wildlife Sites in South Wales adapted for Monmouthshire. The criterion under which the site qualifies shall be noted. The LPA Biodiversity & Ecology Officers should be contacted for relevant templates and to discuss the value of the site / part of the site.

Priority Habitats and Important Features

Habitats as defined by the Phase 1 survey guidelines and Wales Priority Habitat (defined as those listed as Section 7 Habitats of Principal Importance for Conserving Biological Diversity in Wales

under the Environment (Wales) Act 2016) shall be listed in the table. A % value for the habitat types shall be listed.

This information will also be demonstrated on the GIS shape files submitted to the LPA (see separate guidance).

Guidance for assessment of the importance of hedgerows and veteran/over mature trees is included in Annex 3 & 4.

Ecological Connectivity

Sites shall be assessed for existing value for connecting semi-natural habitats in the landscape using Ecological Connectivity Assessment and/or during field surveys. Both habitats and species need to be considered. Opportunities for delivery of habitat connectivity to be listed under the Enhancements section on page viii of the form.

Protected species

These tables indicate the presence or potential presence of protected species, based on SEWBReC records, the desk survey and field survey results. Species with protection or designation at several levels are listed under their highest degree of protection only.

Field signs and sightings are those recorded during the Phase 1 habitat survey.

Potential presence is based on the habitats on and adjacent to the site, the ecology of the species, and knowledge of the species distribution.

Protected Species are defined as those species listed on Schedules 2 and 4 of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) or any post Brexit equivalent legislation AND Species protected under UK legislation i.e. those species listed under Schedules 5 and 8 of the Wildlife & Countryside Act 1981 (as amended) or the Protection of Badgers Act, 1992. Species protected from sale only are excluded.

Wales Priority Species are defined as those listed as species of Principal Importance for Conserving Biological Diversity in Wales under Section 7 of the Environment (Wales) Act 2016

Conclusions

Additional surveys and assessments are listed. These are based on the potential presence of protected species as detailed on page vii of the form. Any surveys that may be necessary prior to the allocation of the site should be identified e.g. horseshoe bat surveys

Potential constraints are summarised, based on the findings of the desk-based assessment and field survey, as recorded in previous sections.

Recommendations for mitigation and enhancement are suggested. These are intended as an indication only, as further survey will be needed to inform mitigation, and the design and purpose of the development will determine ecological impacts and influence mitigation and enhancement possibilities. Reference can be made to the Ecological Connectivity Assessment where appropriate.

Annex 3: Hedgerow Classification

HIGH: Species-rich containing at least five native woody species in a 30 metre sample. Consider features such as banks, ditches, standing trees, ground flora associated and connecting hedges/woodland areas.

Four woody species are recorded and other features are considered important. This would include, potential dormouse habitat.

MEDIUM: Less than five native woody species in a 30 metre stretch, without other features present.

Less than four native woody species, with other features present

LOW: Less than four native woody species, without other features present. Gappy hedges, newly planted.

Annex 4: Veteran and Over Mature Tree Classification

HIGH: Veteran trees >3.7m circumference, 1.3m from base (to include native and non-native species)

Large over-mature trees >2m circumference, or estimated to be over 200 years old, which exhibit characteristics such as dead wood, rot hollows and bracket fungi. To include native and non-native species.

Appendix 8

Compliance with six DCFW Placemaking Principles



Development Compliance with the six DCFW Placemaking Principles
November 2024

Land East of Abergavenny

Roberts Limbrick

Certified B Corporation

03333 405500
mail@robertslimbrick.com
www.robertslimbrick.com

Registered in England. Registration No: 06658029

Coldbrook Estate

Author:	XX
Project:	11599
Revision:	V2
Issued:	29 November 2024

©2024 Roberts Limbrick Ltd

This report has been prepared by Roberts Limbrick Architects.

The contents of this document must not be copied or reproduced in whole or in part without written consent of Roberts Limbrick Architects.

Roberts Limbrick

Contents

Contents 2

What are the principles of the DCFW Placemaking Charter? 4

Draft Development Masterplan 5

Principle 1: People and Community 6

Principle 2: Location 8

Principle 3: Movement 10

Principle 4: Mix of Uses 13

Land Budget 14

Principle 5: Public Realm 16

Principle 6: Identity 18

What is the Placemaking Charter?

The development East of Abergavenny is focused around the Design Commission for Wales' (DCFW) Placemaking Charter.

There is a strong commitment to creating sustainable, inclusive, and people-focused places that enhance community wellbeing and reflect local identity as demonstrated in the masterplan.

1 Roberts Limbrick have been instructed on behalf of 2 Coldbrook Estate to develop a masterplan and strategy for land East of Abergavenny. The Placemaking Charter has been used to influence the design of this strategic masterplan from the early concept stages.

The Design Commission for Wales' Placemaking Charter is fundamentally a set of principles aimed at promoting high-quality, sustainable, and inclusive developments across Wales.

Key Principles of the Placemaking Charter: People and Community:

- To focus on designing places that are inclusive, accessible, and responsive to the needs of the community, fostering a sense of community cohesion.
- Encouraging active travel (walking, cycling, public transport) and promoting these modes over cars. It is also about ensuring places area easy to get around and navigable.
- Creating attractive, functional, and well-maintained public spaces that enhance social interaction and community engagement.
- Supporting mixed uses of the land that can include houses, commercial, jobs, services, and leisure spaces.
- Honing in on the local character of the place. Promoting its heritage and distinctiveness creating an of-the-place development.
- Creating an environmentally conscious development that promotes long term climate resilience, and sustainability.

1 x 2 Coldbrook Estate



Placemaking Guide 2020 (source: DCFW) | The 6 placemaking principles (source: DCFW)

What are the principles of the DCFW Placemaking Charter?

The charter is broken down into the following six principles which focus on creating a fully cohesive development.

It is our aim through the design of this masterplan to adhere and follow these principles to create a well-designed development that prioritises the needs of people, promotes walking, cycling and sustainable movement, enhances community wellbeing, and contributes to environmental, social, and economic resilience of Abergavenny.

The Placemaking Charter is designed to guide stakeholders, developers, architects, planners, local authorities, and communities, to collaborate on delivering better places.

This initiative aligns with Wales' Well-being of Future Generations Act 2015, reinforcing sustainable development and ensuring the creation of healthy, connected, and thriving communities for current and future generations.

The 6 placemaking principles (source: DCFW)

1 People and Community

- The local community are involved in the development of proposals. The needs, aspirations, health and well-being of all people are considered at the outset.
- Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

2 Location

- Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected.
- The location of housing, employment, leisure and other facilities are planned to help reduce the need to travel.

3 Movement

- Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles.
- Well designed and safe active travel routes connect to the wider active travel and public transport network, and public transport stations and stops are positively integrated.

4 Mix of Uses

- Places have a range of purposes which provide opportunities for community development, local business growth and access to jobs, services and facilities via walking, cycling or public transport.
- Development density and a mix of uses and tenures helps to support a diverse community and vibrant public realm.

5 Public Realm

- Streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity.
- They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated.
- They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.

6 Identity

- The positive, distinctive qualities of existing places are valued and respected.
- The unique features and opportunities of a location, including heritage, culture, language, built and natural physical attributes, are identified and responded to.

Draft Development Masterplan



Framework Masterplan (source: RL)

1. Attenuation ponds at lowest point on the site - creates attractive green edge to the main road.
2. Development blocks work with the contours of the site to help minimise engineering and retaining elements.
3. Site Access from A465.
4. Non ticketed access to Abergavenny town centre.
5. Ticketed access to train station for residents and Park & Ride.
6. New local centre, with commercial and community uses creates entrance space and strong frontage along A465.
7. Pedestrian and cycle routes link into the wider area via existing and established connections.
8. Existing PROWs retained and incorporated into the scheme.
9. Development does not extend beyond the 110m contour line to minimise visual impact.
10. Existing trees and hedgerows wherever possible.
11. Play spaces integrated into swathes of the land to create a green focused development.

❶ Principle 1: People and Community

The local community are involved in the development of proposals. The needs, aspirations, health and well-being of all people are considered at the outset.

Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

A sustainable community building will centre at the gateway to the development. This will provide facilities to meet local needs and will also promote active travel.

Uses could include a convenience store, co-working hub, community wellbeing spaces, cycle hub, bike parking an parcel lockers to reduce delivery traffic.

The hub could display local information, bus timetables and walking routes which would introducing new residents to sustainable travel options.

Community and commercial uses would encompass approximately 58,125sqft of space and would provide a strong and robust frontage onto the A465 announcing the development.

Community cohesion and integration will also be fostered from the outset. The development will be designed to align with Abergavenny's heritage, local vernacular and need for new sustainable and robust homes.

There is opportunity to host interactive sessions where local residents can share their ideas, concerns, and aspirations, ensuring their voices directly influencing the development's design.

Through the large volume of community uses planned, spaces will incorporate areas that encourage interaction and integration. There can be shared gardens, a range of playgrounds LAPs and LEAPs, and the multipurpose community center for events, learning, and support services.

The local community need for affordable housing will also be prioritised as part of these proposals. There will be effort made to include diverse housing options, ensuring affordability and accessibility for all income levels, fostering a balanced and inclusive community.

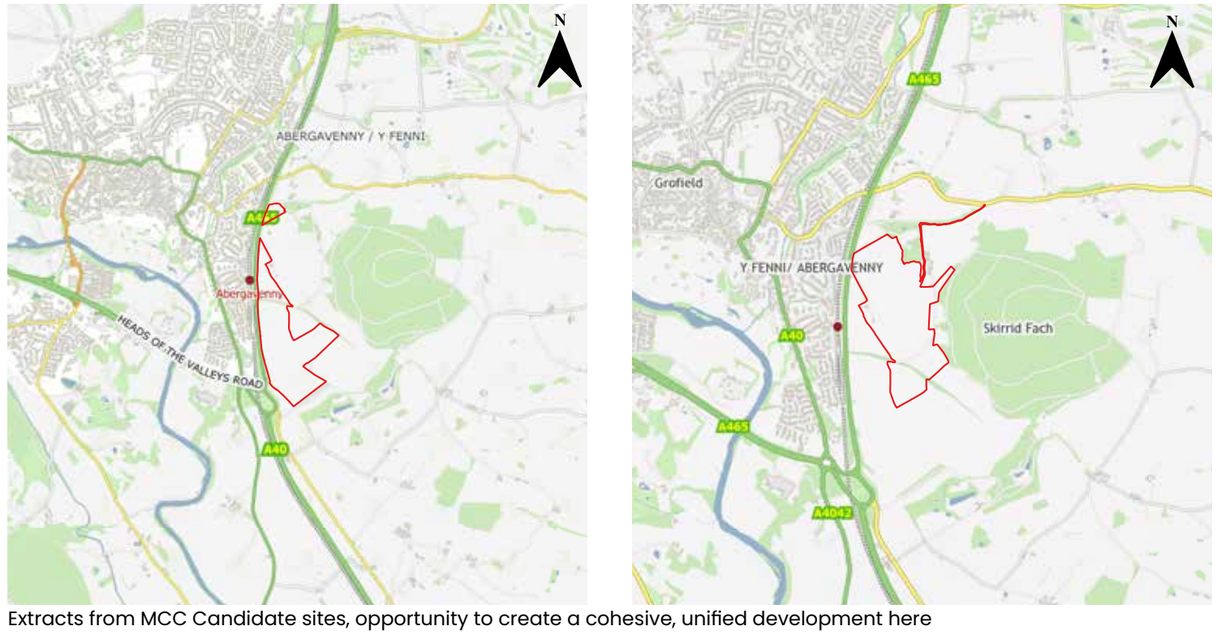


Very strong frontage onto integrated drainage swales and planting

This candidate site was the inspiration of Monmouthshire County Council (MCC) They have already carried out a public consultation and worked through the various stages of the plan to date. This concept evolves the MCC allocation and uses the DCFW placemaking principles to create a strong and robust, of-the-place development.

Working together with land owners, this cohesive plan addresses the area and creates a unified development responding to natural landscape features and also the A465.

Coldbrook Estate are in ownership of land surrounding the red line here and as such there are a range of opportunities for off site mitigation measures should any be needed.



Extracts from MCC Candidate sites, opportunity to create a cohesive, unified development here



Community centred ground floor, wide range of uses


Community building with associated gardens


Mix of retail and residential frontage onto street


Attractive and safe walking routes


Play spaces incorporated throughout


Local identity symbolised through art

2 Principle 2: Location

Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected.

The location of housing, employment, leisure and other facilities are planned to help reduce the need to travel.

The development takes inspiration from the region and character of Abergavenny. There is no development north of the 110m contour line to protect sight lines and to create a development that is respectful to the wider town.

Abergavenny's connectivity makes it a vital gateway enhancing the town's accessibility and sustainability. The development East of Abergavenny will contribute positively to the station, promoting sustainable movement.

This development masterplan uses the land efficiently and focuses around a compact, appropriately dense design. This masterplan ensures the land is used efficiently while not detracting from creating a vibrant and walkable new neighbourhood in Abergavenny.

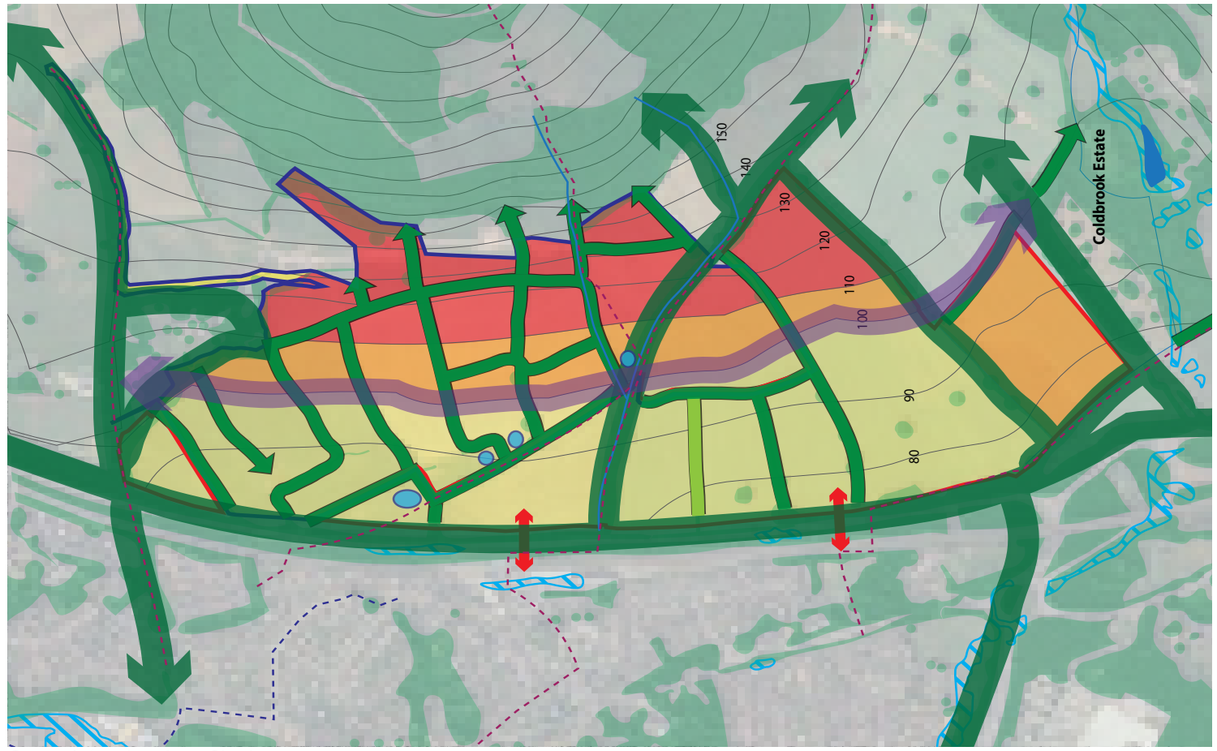
It is hoped this development will integrate with the existing communities, enhance local infrastructure and offer services to wider Abergavenny residents. The deisgn is targetted at achieving these.

Mixed-use spaces will be a key feature, combining residential, retail, and leisure facilities to make the best use of available land and foster active, multifunctional environments with mixed use buildings for example maximising space.

The development will be strategically located with great connectivity to the wider region through safe and direct walking, cycling, and public transport links.

Key facilities such as schools, healthcare, and employment centres will be easily accessible via active travel routes, ensuring that the new community is physically and socially integrated with its surroundings.

Housing, employment, leisure, and essential services will be co-located within the community and mixed use area of the development to minimise the need for residents to travel long distances for work or daily needs.



Green Infrastructure Strategy

Areas of relative high baseline visibility

Areas of relative low baseline visibility

Areas of relative moderate baseline visibility

110m contour line - No development above this contour. Proposed hedgerow and woodland buffer

A sustainable community focused mixed use hub within the development will provide amenities like shops and shared work spaces for example, reducing the need for off-site trips and supporting remote working.

This approach is aimed at ensuring the development is a natural continuation of Abergavenny and also fits into the wider region while strengthening connections with the existing communities.

Visual Landscape Appraisal:

A visual landscape appraisal was completed and this determined to be respectful and in keeping with the local area, the development would not exceed the 110m contour line.

This would screen the development from the surrounding area and settle it within the land at Abergavenny.

Important sight lines would remain and this development would not negatively impact key landmark features in the area.



Houses and development will respect the local area and take inspiration from and fit into the location



Mixed use building with retail on the ground floor



Mixed use and community uses on ground floor, apartments on upper floors to activate space



Robust frontage onto attenuation and the primary road, design is of the place and harmonious with Abergavenny



Local area respected



Community gathering spaces can be created

3 Principle 3: Movement

Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles.

Well designed and safe active travel routes connect to the wider active travel and public transport network, and public transport stations and stops are positively integrated.

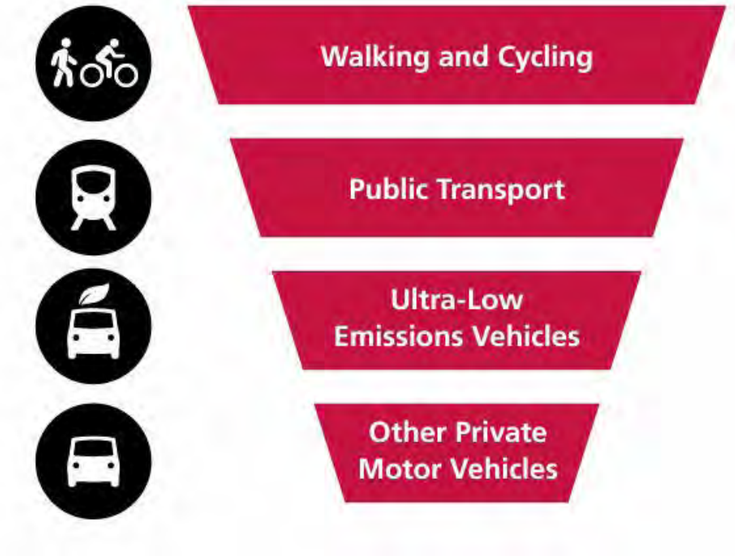
Within the development site, movement via bicycle and on foot will be prioritised over car journeys. All footways will be designed to standards. A well designed route hierarchy will also movement and provide a navigable street hierarchy.

Links will be created to existing Public Rights of Way (PROWs) throughout the site. All of the PROWs will be retained within the site and will be enhanced and incorporated into green corridors and along routes.

A new movement hierarchy will be created over the A465. Here, a radical new public space will be created turning the road into a street. This will facilitate, and promote movement over the main road towards the train station and the town core to the West.

Abergavenny train station provides regular connections to Cardiff, Newport, and Hereford, as well as direct links to Birmingham. With frequent services to Cardiff, the station is an important commuter link, facilitating easy access to Cardiff for both work and leisure. The station also offers routes towards Brecon Beacons and surrounding areas, making it popular with tourism.

The A465, is a major route running through Abergavenny and so there area number of bus services along here. Several bus routes operate along this corridor, linking Abergavenny with nearby towns such as Merthyr Tydfil, Brynmawr, and Aberdare, as well as connecting to Cardiff and other parts of South Wales. These services offer regular options for both commuters and residents. The bus routes along the A465 also support access to key facilities, including the town centre, local schools, and businesses, contributing to the region's sustainable transport network by reducing road congestion and promoting greener travel options.



This table highlights movement via Active Travel routes for different users.

This can be summarised that reasonable distances for active travel modes are:

Cycling - 5 Miles

Walking - 2 Miles

Cycling on an electric bike - 5 Miles

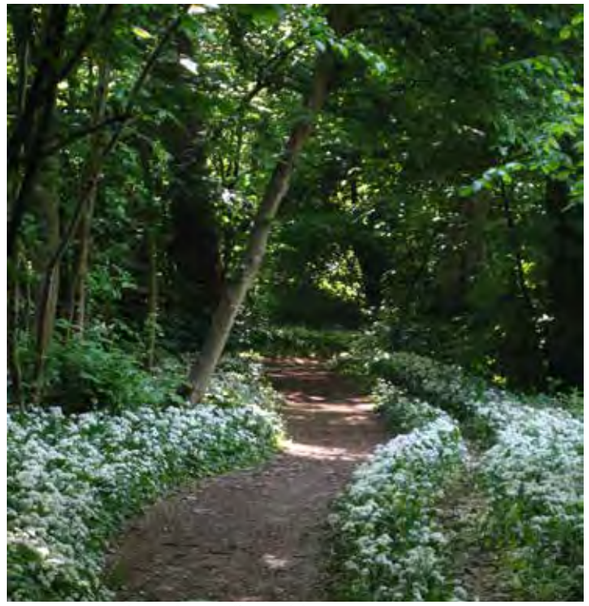
Mode	Less than 1 mile	Up to 2 miles	Up to 3 miles	Up to 4 miles	Up to 5 miles	Up to 7.5 miles	Up to 15 miles
	●	●	●	●	●	●	●
	●	●	●	●	●	●	●
e-	●	●	●	●	●	●	●

Colour	Average active user likelihood
●	Many users likely to travel this distance for utility journeys
●	Some users likely to travel this distance for utility journeys
●	Few or no users likely to travel this distance for utility journeys

Active Travel Act Guidance (source: Welsh Gov)



Natural loop routes created



Opportunity for ‘trim trails’ at fringes



Cycling and active movement

There is also a Park & Ride (P&R) facility integrated into the development at the access junction with the A465.

It is strategically located at the entrance to the site, ensuring it remains easily accessible while minimising disruption to residents within the development parcels.

This is located near to the A40 and A465 which create a distinctive connection to Abergavenny train station. This then links into the wider rail network. This positioning supports regional travel while reducing the reliance on private car journeys.

The P&R facility will hopefully contribute to green and sustainable movement. It will also encourage public transport use which will be promoted over private car travel. The P&R makes it convenient for residents and visitors to transition from their cars to the train which will also hopefully reduce road congestion.

By decreasing the number of individual car journeys (taking the train instead) the scheme significantly reduces greenhouse gas emissions and promotes links into the wider Active Travel (AT) network.

Specific pedestrian crossings along the A465 will connect the P&R to the station and onto Abergavenny to the east.

This also has a number of shared benefits, not just for residents of the new development. Residents can use the Park and Ride for commuting while visitors can also benefit from easy access to transport without burdening local roads or parking resources.

The whole development will include accessible pavements, clear signage, and seating areas that will ensure all abilities feel comfortable and safe navigating the area.



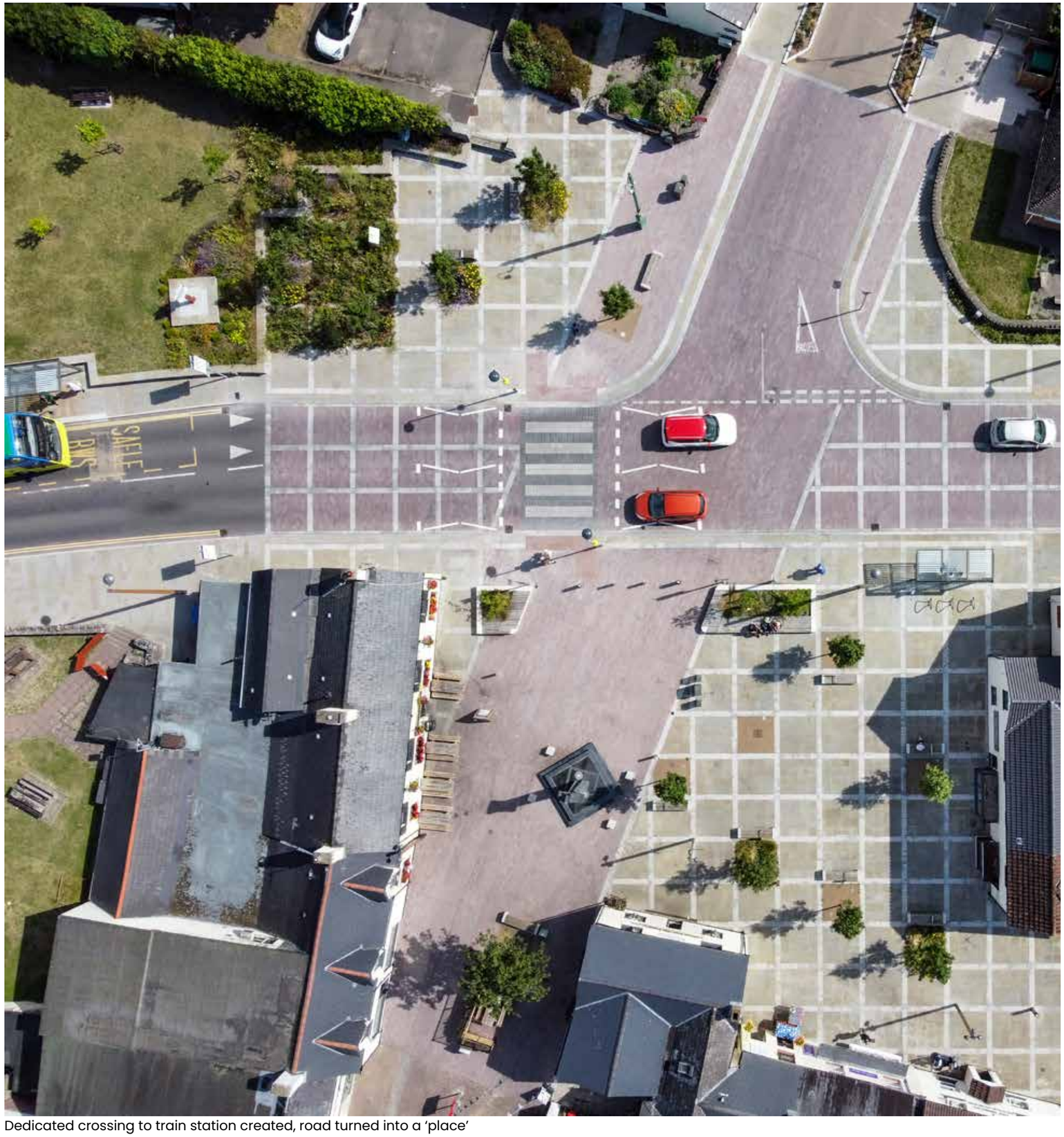
Integrated, and accessible paths through development



Opportunity to create an attractive street



Raised table traffic calming



Dedicated crossing to train station created, road turned into a ‘place’

4 Principle 4: Mix of Uses

To comply with this principle, the site not only features residential development, but also a range of other uses focused around creating a wholly functioning development for residents.

Some of these uses include mixed use work spaces, a park and ride hub, an integrated transport exchange, swathes

The land budget highlights the varied uses incorporated on the development site:

1. Residential Development
2. Potential Future Development
3. Community uses, community hub and interchange
4. Park & Ride
5. Green public open spaces
6. Commercial space

This varied land use allows the site to serve a number of functions and creates a walkable and livable place for residents.

Residential development land

Approximately 15.68ha of land has been earmarked for residential development. This would produce in the region of 500no units within the plan period. The residential land, while a fundamental element, is not the only type of allocation here.

Green spaces

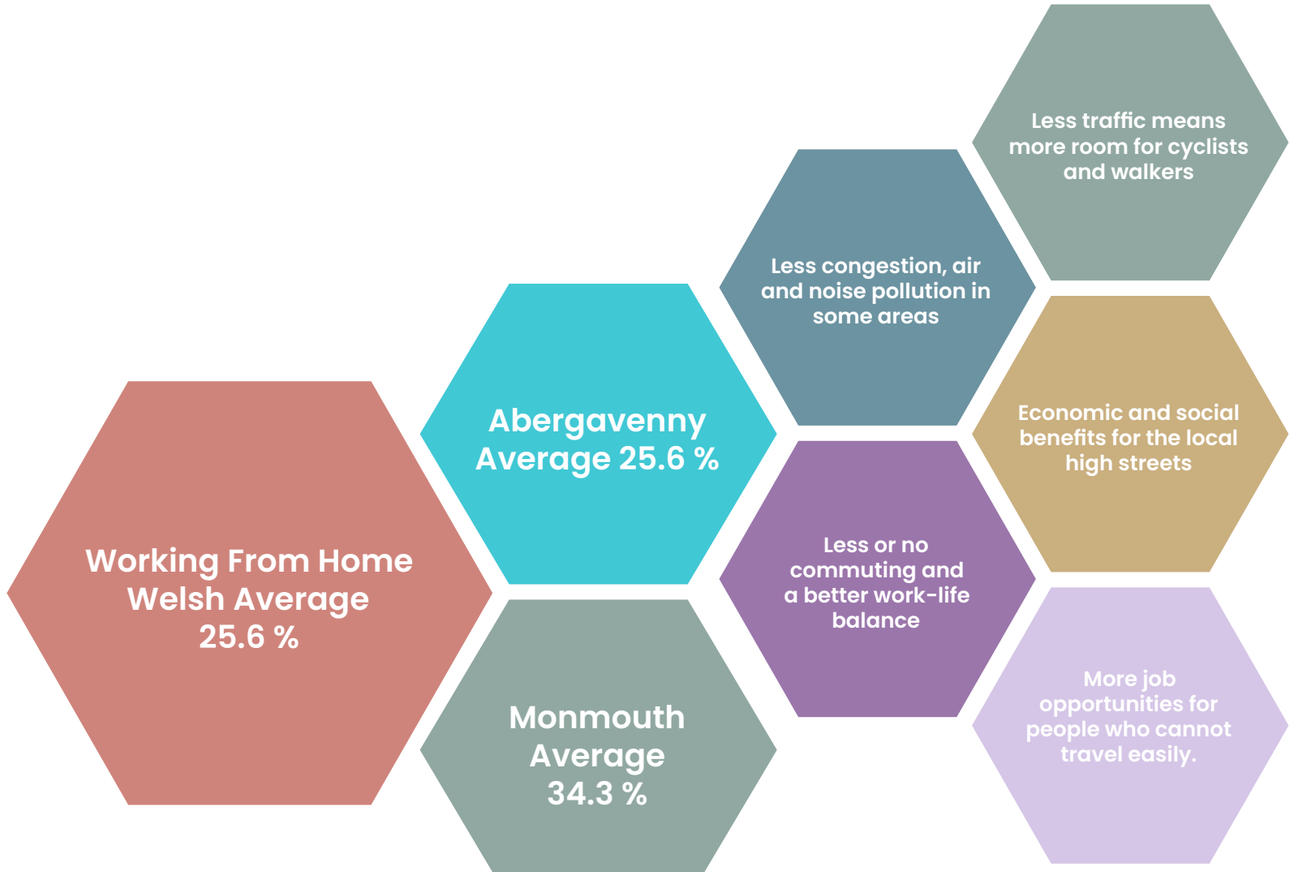
Within the land use plan and framework masterplan, there are swathes of the site earmarked for open spaces, play zones and natural green space to be enjoyed by all residents.

Almost 18ha of open space, green areas and play has been shown on the plan which creates a development with a green heart.

Local Business Hubs

Establishing opportunities for local entrepreneurs, including community spaces or shared workspaces for example will strengthen the local economy and create jobs within the community.

Park & Ride (see movement chapter)



Working from home statistics (source: 2021 census) | Benefits of working from home (source: WG remote working strategy)

Co-Working spaces

Working from home and working remotely has grown significantly in recent years. This not only reduces daily car usage but highlights the need for flexible spaces for those unable to work from home due to space or distractions.

To address this, a remote working hub within a sustainable community building could be incorporated into this site. This could offer rentable desks and private rooms for both new and existing residents, further minimizing car use in the area.

Not only would this foster a community within the development, but also offer flexible spaces for the wider residents of Abergavenny creating a cohesive sense of community with existing residents.

These interventions and vast mix of uses within the site will ensure the development meets the aspirations of the local community while fostering equality, inclusion, and a thriving sense of community well-being.

Land Budget



Land Use plan (source: RL)



Integrated public space, opportunity for spill out zones



Mix of retail, cafes, commercial, co working and community spaces



Local centre, village core created



Opportunity for seating, dwell time



Dedicated crossing, ‘place’ created at train station

5 Principle 5: Public Realm

Streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity. They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated.

They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.

Vast swathes of this development site are earmarked for public open spaces (POS) play spaces, (LEAP & LAP) as well as community spaces. These all work hard to create a robust, attractive and quality public realm not only for new residents, but for Abergavenny as a wider whole.

This development will be designed with health at the core. This development can enhance physical and mental well-being, such as promoting green spaces, active travel routes, accessibility and public realm facilities.

A community will also be fostered through the inclusion of these communal parks, walking trails, and natural areas that encourage active lifestyles, improve mental health, and provide shared spaces for residents to connect.

Public spaces will be designed to incorporate secure by deisgn principles. This will further limit antisocial behaviour etc. On this theme, streets and public spaces will be designed with clear boundaries using high-quality materials, landscaping, and appropriate lighting to create a welcoming and visually cohesive environment but also demarcate private and public spaces.

Public spaces will reflect the character of the location and the new public space created at the gateway between the train station will further set this development as a landmark site.

A new raised table here will transform the road into a ‘street’ The introduction of soft and hard landscaping (native plant species, enhancing biodiversity) will create a place.

It is hoped, this measure will slow down cars and emphasise the importance of pedestrian movement across the road.



Attenuation creating an attractive gateway to development



Community growing space



Community allotment



Integrated natural play



Green and green infrastructure combine



Corner turning unit creates attractive frontage

Green and blue infrastructure

Green measures such as tree-lined streets, community gardens, and biodiversity corridors will be integrated to enhance air quality, provide shade, and support local wildlife all the while contributing positively to the public realm within and surrounding the development.

Sustainable drainage systems (SuDS), including permeable paving, swales, and rain gardens, will be embedded into streets and public spaces to manage surface water, prevent flooding, and contribute to the area's visual appeal.

Play

Streets and public spaces will encourage social interaction through the inclusion of playgrounds, seating areas, and community hubs that cater to people of all ages and interests. Not only through formal play spaces but also informal, on the way play will be included.

This approach to public realm ensures the development is not only functional and sustainable but also creates a thriving, inclusive and attractive environment that meets the needs of residents.



Play throughout the development



Natural fringes to the development created through the public realm

6 Principle 6: Identity

The positive, distinctive qualities of existing places are valued and respected.

The unique features and opportunities of a location, including heritage, culture, language, built and natural physical attributes, are identified and responded to.



Natural identity represented through planting

This development complies with the identity principle within the Placemaking Charter. Specific attention to the local area, vernacular, historic significance and context of the place have informed the design of the masterplan at this stage.

This framework plan embraces and enhances the unique characteristics of Abergavenny. This will create a natural continuation to the town respecting its location, heritage, culture, and natural surroundings.

Here are key approaches this masterplan encompasses to respect, and enhance the local identity:

- Incorporates design elements that reflect the area's history, such as not building development past the 110m contour line to protect sight lines.
- Including a new dedicate crossing at the entrance creatong a place and public realm promoting movement across the road to the train station.
- Showcasing local stories and art at varies opportunities throughout the POS.
- Support the use of the Welsh language by integrating bilingual signage and spaces that promote cultural events or language-learning initiatives.
- We can also use locally sourced materials where possible to maintain continuity with the area's natural environment and reduce the carbon footprint.
- The development will align with the wider region of Abergavenny through the scale, density, and pattern of development rather than disrupting the existing character.
- Paths will link to the identity of the area through and along PROWs within the site.

Connections will integrate seamlessly with existing networks, further valuing and responding to the unique features and qualities of the location.

This development not only preserves but enhances the identity of Abergavenny, ensuring it contributes positively to the area's legacy and fosters a meaningful connection for new residents and visitors alike.

A distinct identity will be established by reflecting local heritage and culture in the design, including public art, architectural details, and native planting that enhance the sense of place and community pride.



Natural play creating a fun place to be



Opportunity to hone in on local art and history, signage to the train station and beyond



Opportunity to include local art / historic significance in paths and routes



Natural play-on-the-way



Opportunity for natural edges to the development respecting local character and built form



Opportunity for nature trails - local heritage and identity trails

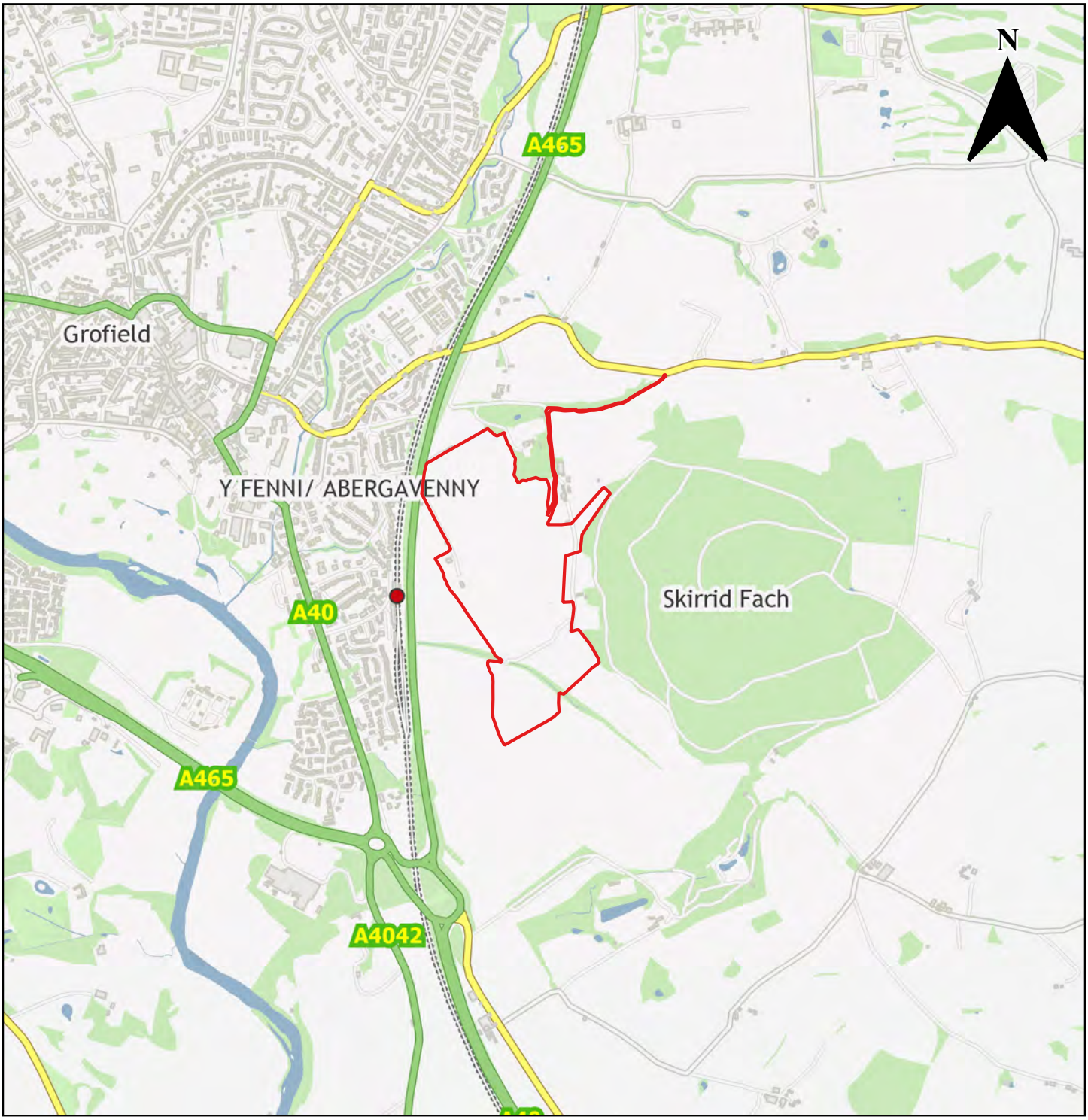
People
Location
Movement

Designed for Placemaking

Mixed Use
Public Realm
Identity

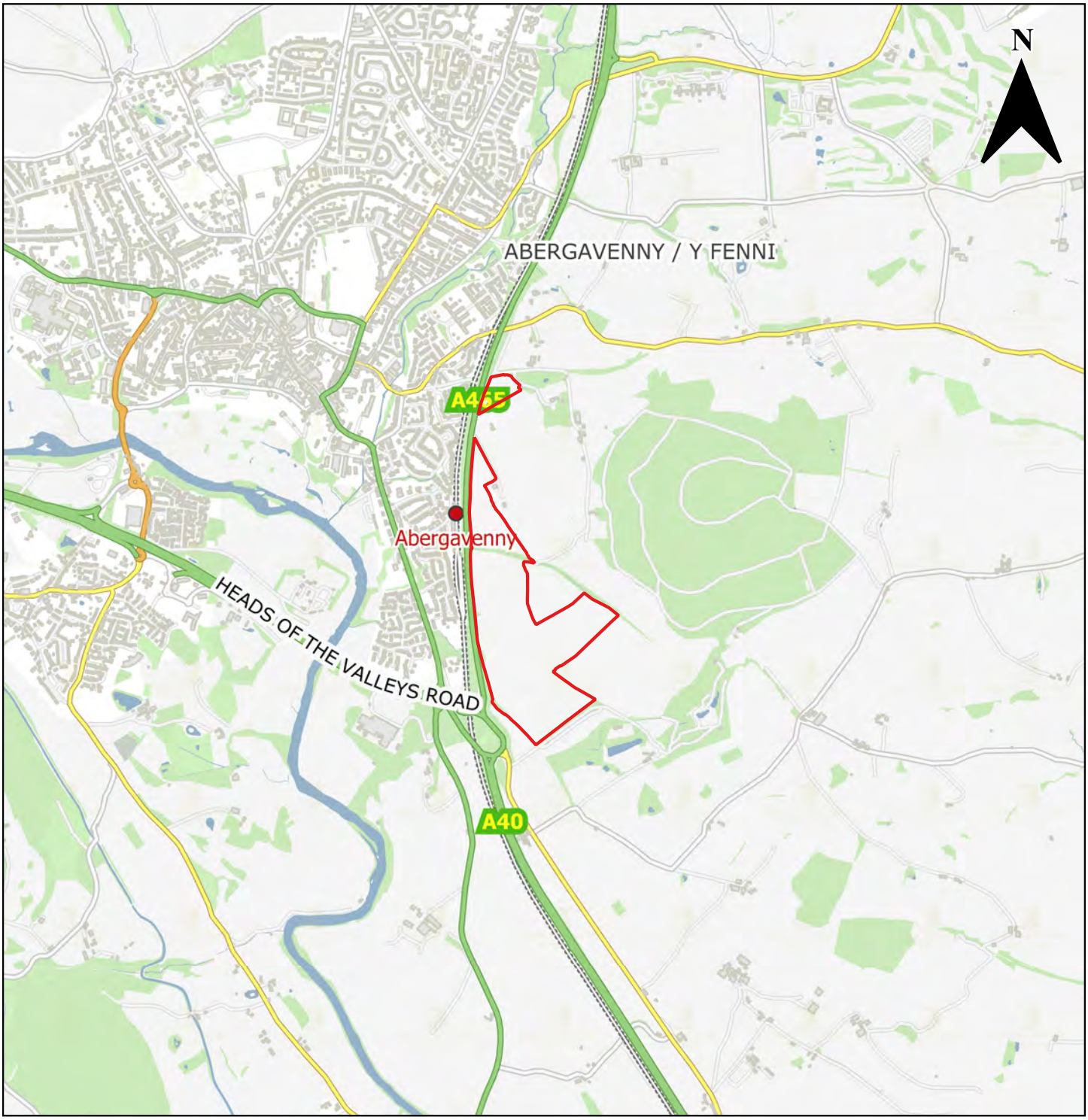
Appendix 9

Candidate Site Boundaries (Land Ownership)



Candidate Site Number	CS0213
Site Name	Land east of A465
Site Promoter	Monmouthshire Housing Association
Settlement	Abergavenny
Ward	Gobion Fawr
Proposed Use	Mixed Use: Residential (C3), Employment (B1), Retail (A1), Leisure, Education and Community Use (D1, D2)
Site Size in Hectares	24.75 ha

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
	(c) Ordnance Survey 10023415 2021	Not to Scale



Candidate Site Number	CS0293
Site Name	Land east of A465 2
Site Promoter	Coldbrook Estate
Settlement	Abergavenny
Ward	Gobion Fawr
Proposed Use	Mixed Use: Residential (C3), Employment (B1/B8), Retail/Commercial (A1/A3), Leisure, education and community use (D1/D2)
Site Size in hectares	32.62 ha

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
	(c) Ordnance Survey 10023415 2021	Not to Scale

MONMOUTHSHIRE RLDP – DEPOSIT PLAN CONSULTATION – CS0243 LAND NORTH OF VILLAGE HALL, LLANELLEN

Llanellen as a Location for Growth

Strategic Policy S2 sets out the settlement hierarchy which directs the distribution of development across the County. The settlement hierarchy allocates a portion of growth to the Tier 3 and Tier 4 Rural Settlements which account for 9% of the total residential growth across the County.

It is welcome that the Deposit Plan recognises the value of Llanellen as a Main Rural Settlement in accommodating growth proportionately. Under Policy HA19, the Deposit Plan allocates Land adjacent to Llanellen Court Farm, Llanellen, for residential development of approx. 26 homes. By virtue of this allocation, the Deposit Plan acknowledges that residential development Llanellen is sustainable when considering distance to key services, amenities and employment. However, we consider that Land North of Village Hall (Candidate Site Reference: CS0243) offers a more sustainable location to accommodate sustainable growth in Llanellen (circa 26 dwellings) than Land adjacent to Llanellen Court Farm, Llanellen.

CS0243 Land North of Village Hall, Llanellen

The centre of Llanellen is located circa 50m to the east of the development site which has a number of day-to-day facilities including a village hall, village shop, sports pitches and a children's play area. Land adjacent to Llanellen Court Farm fronts the busy A4042 whereas Land North of Village Hall fronts and is accessed off the B4629 which provides two existing footways for pedestrian access into Llanellen itself and beyond.

Land North of Village Hall immediately abuts the settlement boundary of Llanellen and therefore comprises a logical extension to the existing settlement. It is proposed that the settlement boundary be extended to include Land North of Village Hall, Llanellen.

The site would enable Llanellen to grow and develop in a way that uses land efficiently, supports and enhances the existing settlement and is well connected. The capacity exists to increase the population to sustain services, facilities and public transport. The Site will accommodate a significant area of public open space, a children's play area and additional car parking facilities for the existing village hall and shop, which would be accessible to the existing residents of Llanellen.

Aside from the settlement boundaries, the site is not affected by any landscape designations which seek to prevent settlements from merging. In fact, by virtue of the containment by the River Usk and the residential development to the south within the Llanellen settlement boundary, development of this site would remain well contained with the existing settlement. A significant 2km distance of undeveloped countryside would be remain to the north between Llanellen and Abergavenny.

Walking, cycling and public transport can be prioritised to provide a choice of transport modes and avoid dependence on private vehicles. Well designed and safe active travel routes can connect to the wider active travel and public transport network.

Please see an Illustrative Masterplan for the Site at Appendix A

Accordance with RLDP Objectives

The table overleaf identifies how residential development of up to 26 residential dwellings at Land North of Village Hall, Llanellen would contribute to (and accord with) the relevant RLDP Objectives as per the Strategic Framework of the Deposit Plan.

Objective Number	RLDP Objective	Accordance
3	To protect, enhance and manage the resilience of Monmouthshire's natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health and wellbeing. This includes the Wye Valley National Landscape (AONB), the County's other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	According to the MCC Landscape Capacity and Sensitivity Study (2019), the site is located within an area of medium/high sensitivity. Its value lies in the designation of the River Usk adjacent as a SAC and SSSI and the attractive scenic quality of the river corridor. It is however considered that a large, landscaped area of public open space which acts as a buffer between the River Usk and the new development can mitigate against any impact. A LVIA would be commissioned to support any detailed design proposals for the site. The desk studies and Extended Phase 1 Habitat survey undertaken in 2019 identified a limited range of habitats within and immediately outside the candidate site. A green infrastructure-led approach would be adopted for development of the site in accordance with RLDP Objective 3 and wider PPW12 guidance.
4	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.	The NRW Flood Map for Planning shows the site to be predominantly within Flood Zone 1 with small pockets of Zone 2/3 (Rivers) and Zone 2/3 (Surface Water and small watercourses) present within the Site to the north. The layout of development can be configured to avoid flood risk areas. For discharge of surface water flows, a sustainable drainage system (SuDS) will be incorporated into the masterplan of the site, in accordance with the requirements of the Monmouthshire Sustainable Drainage Approval Body (SAB). Please find enclosed an FCA and Conceptual Drainage Strategy (2021) prepared in respect of this Site.
6	To promote the efficient use of land, including the need to: • maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire.	In allocating 9% of housing growth to Tier 3 and 4 settlements, the Deposit Plan recognises the value of main rural settlements to accommodate housing growth. Whilst the majority of the site is Grade 2 agricultural land according to the Welsh Government Predictive Agricultural Land Classification Map, it is acknowledged that best and most versatile (BMV) land covers most of the County and that development at sustainable locations will not be restricted.

Objective Number	RLDP Objective	Accordance
	• protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development. • support the adaptation and re-use of existing sustainably located buildings.	An ALC Survey could be commissioned to determine the actual ALC to support any detailed design proposals for the site.
9	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	By virtue of accommodating 50% affordable housing, Land North of Village Hall, Llanellen will provide opportunity for the younger population to live and work in Monmouthshire contributing to the creation of a more balanced demography.
10	To provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents.	
11	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe and accessible places to live, work and visit; and promote people's prosperity, health, happiness and well-being.	The site is capable of accommodating a sustainable form of residential development with strong placemaking credentials to benefit the village as a whole which has historically suffered from a lack of holistic development. The site would enable Llanellen to grow and develop in a way that uses land efficiently, supports and enhances the existing settlement and is well connected. The homes provided could cater for a range of needs (age and health) and affordability.
14	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water,	It is considered that due to the proximity of the site to the existing settlement of Llanellen, along with the modest proposal that connections can be made to existing services. Any contributions to local services and facilities would be via S106/CIL.

Objective Number	RLDP Objective	Accordance
	transport, health care and broadband etc.) is in place or can be provided to accommodate new development.	
15	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	The site is readily accessible from Llanellen by active travel and Llanellen is well connected to the surrounding area by public transport. The nearest bus stop to the development site is located approximately 50m away on the A4042. The stop is serviced by the 23 bus which provides hourly services to Abergavenny. The site's good connection to existing facilities and services further reduces demand for private vehicle use.
17	To strive to limit the increase in global temperatures to 1.5oC, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	Any development would be capable of utilising suitable building practices and technology to reduce the carbon footprint of the development at every stage of the project lifecycle and throughout the supply chain. The development of the site will address climate change pragmatically by considering the energy hierarchy in the detailed design proposals. New residential buildings will be delivered which include consideration of the following factors to reduce the overall energy demand of the development: • Site layout and design; • Building layout; • Energy efficient building fabric; and • In home energy efficiency measurements.

Conclusion

It is welcome that the Deposit Plan recognises the value of Llanellen as a Main Rural Settlement in accommodating growth proportionately. This submission demonstrates that Land North of Village Hall is capable of accommodating sustainable residential development with strong placemaking credentials. Such development accords with the RLDP Objectives as set out above.

On behalf of the landowner, we would welcome the opportunity to work with the Council to deliver the promotional land for residential development within the RLDP.

Appendices

Appendix A

P:\3300-3399\JSL5333 - VILLAGE HALL, LLANELLEN\TECH\GRAPHICS



© 2024 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

LEGEND

- SITE BOUNDARY
- POTENTIAL OPEN SPACE
- RESIDENTIAL BLOCK
- HEDGE / VEGETATION
- TREES
- GREEN VERGE & RAIN GARDEN
- PLAY AREA
- LOCAL FACILITY
- BUS STOP SHELTER
- SITE ACCESS
- FOOTPATH CONNECTION
- SUDS

NOTE:

1. VILLAGE HALL ADDITIONAL PARKING SPACE ARE PROVIDED

2 VISITOR'S PARKING SPACES FOR THE RESIDENTS ARE PROVIDED WITHIN THE DEVELOPMENT

HOUSE TYPES

TWO STOREY HOUSE	SQM	SQFT	AMOUNT
4 BED X 5 PERSONS	126	1360	4
4 BED X 5 PERSONS	164	1765	4
4 BED X 5 PERSONS	111	1200	5
3 BED X 4 PERSONS	93	1010	7
2 BED X 3 PERSONS	83	895	6
TOTAL NO.			26 NO

Rev	Description	Date	Initial	Checked

rps MAKING COMPLEX EASY
Lakesbury House, Hilltingbury Rd,
Eastleigh
SO53 5SS
T: 023 8081 0440 E: rpsso@rpsgroup.com

Client **Coldbrook Estate**

Project **Land North of Village Hall, Llanellan**

Title **Illustrative Masterplan**

Status: Planning
Drawn By: FD / YT
PM/Checked by: YT / DP
Job Ref: JSL5333
Scale @ A0: 1:500
Date Created: December 2024
Drawing Number: 5333-RPS-XX-XX-DR-UD-9101-S3-P01
Rev:

rpsgroup.com

3669

Mathern Estates

Planning & Development Consultants
Ymgynghorwyr Cynllunio a Datblygu

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS
Tel: 02920 732 652
www.asbriplanning.co.uk

Our Ref: 23.101
Date: 16th November 2024

Planning Policy Team
Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP15 1GA

Dear Sir or Madam,

Town and Country Planning Act 1990
Candidate site submission and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan
Caerwent Quarry, Caerwent, Caldicot, NP26 5AH

Introduction

Asbri Planning is appointed as planning agent to Mathen Estates in respect of the above candidate site submission for tourism development at Caerwent Quarry, Caerwent, Caldicot and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan. The following documentation is submitted:

Document Name	Prepared by
Candidate Site Submission and Deposit Plan Representation – Cover Letter: - Appendix 1 Pre-Application Submission - Appendix 2 Pre-Application Response (Ref: DM/2023/00747) - Appendix 3 Sustainability Appraisal	Asbri Planning
Deposit Plan Representation – Form	Asbri Planning

Monmouthshire County Council is currently consulting on its Deposit Plan, together with the supporting Integrated Sustainability Appraisal Report and Habitat Regulations Assessment. The Deposit Plan was endorsed for statutory public consultation/engagement at the Council Meeting on 24th October. The documents are available for consultation until Monday 16th December.

Strategic Policy S12 of the RLDP relates to the Visitor Economy and is permissive of development proposals that support Monmouthshire's visitor economy and promote sustainable forms of tourism subject to the assessment of material planning conditions. It goes onto state that development proposals that would have an unacceptable adverse impact on features and areas of tourism interest and their landscape character and settings, or that would result in the unjustified loss of tourism facilities will not be permitted.

Policy T1 relates to New or Extended Tourism Accommodation and Facilities in the Open Countryside and establishes the policy framework through a number of specific criteria against which relevant proposals will be assessed. This letter seeks to object to the wording of the policy and suggests amendments as described in further detail in the following sections.

Pre-Application Discussions

This candidate site submission follows a pre-application enquiry (Ref: DM/2023/00747) submitted in May 2023 which related to the proposed development of 59no. holiday cabins and associated works at the Caerwent Quarry site. The pre-application submission and response from Monmouthshire County Council are included in appendices 1 and 2 of this letter respectively. The submission comprised the following documentation:

Document Name	Prepared by
Pre-application Request Forms	Asbri Planning
Pre-application letter	Asbri Planning
Site Location Plan	Asbri Planning
Proposed site layout	AMT Design
Landscape Strategy	Tir Collective
Transport Technical Note	Asbri Transport
Illustrative Visual	AMT Designed

The pre-application response was overall favourable towards the development but recognised that there was a gap in the LDP as the specific tourism policies did not relate to a development of this nature. A summary of the key points raised within the response is provided below:

- It was considered unlikely that a suitable site within the designated boundaries would exist given the nature of the development, therefore it is considered acceptable to consider sites within the open countryside or adjoining the boundaries.
- The site has suitable links to the settlements of Caerwent and Caldicot that would provide easy access by both private vehicle and via sustainable modes of transport.
- Tourism is noted as being a key industry of the rural economy within Future Wales, PPW11 and TAN13, therefore adding support to the principle of development to provide holiday accommodation outside the settlement boundaries.
- Policy S11 (Visitor Economy) of the current LDP is the strategic policy relating to tourism. On the basis that the proposed development clearly demonstrates not adverse impact and provides a benefit in respect of the local economy it would be considered favourably.
- Policies T1 (Touring Caravan and Tented Camping Sites) and T2 (Visitor Accommodation outside Settlements) of the current LDP represent the more detailed planning policies do not cover a proposals of this nature/scale. Therefore, the development would be considered contrary to the detailed planning policies. However, the absence of detailed planning policy was considered to be a gap within the LDP and is not considered sufficient as to raise an objection to the proposed development subject to an economic and biodiversity benefit being demonstrated via a planning application.
- Any application would therefore need to be advertised and treated as a departure from the LDP.
- A significant amount of weight would be applied to the economic benefits generated from the site and proposal.

Detailed Comments

As aforementioned, Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) of the Replacement Local Development Plan provides the detailed framework against which tourism proposals will be assessed. The proposed wording of the Policy is as follows:

Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria:

a) *Is of a small scale appropriate to its context and a non-permanent nature that would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or*
b) *Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or*
c) *Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or*
d) *Relies upon a geographically fixed resource which exceptionally justifies the development; or*
e) *Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or*
f) *Demonstrates significant economic benefit to Monmouthshire.*

Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below:

g) *Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment;*
h) *Are of a scale, permanency and design appropriate to site context;*
i) *Incorporate sustainable and efficient resource use;*
j) *Have the necessary infrastructure capacity;*
k) *Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design;*
l) *Do not have an unacceptable amenity impact on occupiers of neighbouring properties.*

All tourism proposals must be evidenced with a 'Sustainable Tourism Need and Impact Assessment' (STNIA).
All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.

The pre-application response (Ref: DM/2023/00747) received from Monmouthshire County Council recognises that there is a gap in the current LDP for Policies relating to permanent holiday cabin type proposals which resulted in the development being considered a departure from the LDP. Similarly, it appears that provision for such developments is excluded from the wording of T1 in the proposed Replacement LDP but included in the support text of the policy. It is therefore suggested that the Policy is amended in the following manner to specifically include such developments. Text which is to be deleted is shown as ~~struck through~~ whilst new text to be added is shown in green.

Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria:

a) *Is of a ~~small~~ scale appropriate to its context and ~~a non-permanent nature that~~ would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or*
b) *Comprises permanently sited new accommodation such as static caravans, lodges and larger self-contained glamping units that require significant infrastructure requirements which is carefully considered and comprehensively justified; or*
c) *Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or*
d) *Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or*

e) *Relies upon a geographically fixed resource which exceptionally justifies the development; or*
f) *Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or*
g) *Demonstrates significant economic benefit to Monmouthshire.*

Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below:

h) *Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment;*
i) *Are of a scale, permanency and design appropriate to site context;*
j) *Incorporate sustainable and efficient resource use;*
k) *Have the necessary infrastructure capacity;*
l) *Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design;*
m) *Do not have an unacceptable amenity impact on occupiers of neighbouring properties.*

All tourism proposals must be evidenced with a 'Sustainable Tourism Need and Impact Assessment' (STNIA).
All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.

In addition, it is proposed that the supporting text of the policy is amended as follows:

18.2.5 As set out in policies S11 and RE3, sustainable tourism uses can complement and help support farm businesses and Monmouthshire's rural economy. Tourism proposals in the open countryside should seek to re-use existing buildings within the farm unit/ farmstead. Proposals for new build tourist facilities such as glamping units located on farmland (outside of the farmstead away from existing buildings), must meet all the criteria (g) –(l) of Policy T1. New build proposals akin to new dwellings for holiday use will not be supported. Rural conversions to holiday let use can offer scope for a tourism use where they would normally be resisted for a residential use due to limited space and amenity, as they are intended to be used on a short-term basis and do not require additional paraphernalia.

<u>Allocation</u>
It is noted from reviewing the proposals map for the Replacement LDP that allocations for tourism development are absent. It is therefore proposed that tourism allocations are included within the plan and Caerwent Quarry is allocated as such.

In accordance with the requirements of new or amended sites submitted as part of representations to the Replacement Local Development Plan, the submission is accompanied by the pre-application submission which provides a plan of the site, details of the proposed use and documentation demonstrating that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. In addition, a Sustainability Appraisal is submitted in Appendix 3 of this letter.

<u>Conclusion</u>
This letter has been prepared on behalf of Mathen Estates in respect of a candidate site submission for tourism development at Caerwent Quarry, Caerwent, Caldicot and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan

The site's promoter is committed to delivering a sustainable, high quality tourism allocation on the Caerwent Quarry site in accordance with policies of the Replacement plan (both site-specific and plan-wide policies) through the candidate site submission process.

This letter follows a pre-application enquiry relating to the proposed development that recognised the absence of relevant policies within the adopted LDP. The changes are therefore proposed to the wording of relevant policies in the Replacement LDP to ensure that provision is included for such proposals and they are not considered departures from Local Planning Policy purely due to the lack of specific policies.

We look forward to the RLDP progressing and would welcome the opportunity to take part in relevant Hearing Sessions in relation to Policies S12 (Visitor Economy) and T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) specifically.

Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representation.



Appendix 1

Pre-Application Submission

Appendix 2

Pre-Application Response (Ref: DM/2023/00747)

Appendix 3

Sustainability Appraisal

Planning & Development Consultants
Ymgynghorwyr Cynllunio a Datblygu

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS
Tel: 02920 732 652
www.asbriplanning.co.uk

Our Ref: 23.101
Date: 16th November 2024

Planning Policy Team
Monmouthshire County Council
County Hall
The Rhadyr
Usk
NP15 1GA

Dear Sir or Madam,

Town and Country Planning Act 1990
Candidate site submission and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan
Caerwent Quarry, Caerwent, Caldicot, NP26 5AH

Introduction

Asbri Planning is appointed as planning agent to Mathen Estates in respect of the above candidate site submission for tourism development at Caerwent Quarry, Caerwent, Caldicot and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan. The following documentation is submitted:

Document Name	Prepared by
Candidate Site Submission and Deposit Plan Representation – Cover Letter: - Appendix 1 Pre-Application Submission - Appendix 2 Pre-Application Response (Ref: DM/2023/00747) - Appendix 3 Sustainability Appraisal	Asbri Planning
Deposit Plan Representation – Form	Asbri Planning

Monmouthshire County Council is currently consulting on its Deposit Plan, together with the supporting Integrated Sustainability Appraisal Report and Habitat Regulations Assessment. The Deposit Plan was endorsed for statutory public consultation/engagement at the Council Meeting on 24th October. The documents are available for consultation until Monday 16th December.

Strategic Policy S12 of the RLDP relates to the Visitor Economy and is permissive of development proposals that support Monmouthshire's visitor economy and promote sustainable forms of tourism subject to the assessment of material planning conditions. It goes onto state that development proposals that would have an unacceptable adverse impact on features and areas of tourism interest and their landscape character and settings, or that would result in the unjustified loss of tourism facilities will not be permitted.

Policy T1 relates to New or Extended Tourism Accommodation and Facilities in the Open Countryside and establishes the policy framework through a number of specific criteria against which relevant proposals will be assessed. This letter seeks to object to the wording of the policy and suggests amendments as described in further detail in the following sections.

Pre-Application Discussions

This candidate site submission follows a pre-application enquiry (Ref: DM/2023/00747) submitted in May 2023 which related to the proposed development of 59no. holiday cabins and associated works at the Caerwent Quarry site. The pre-application submission and response from Monmouthshire County Council are included in appendices 1 and 2 of this letter respectively. The submission comprised the following documentation:

Document Name	Prepared by
Pre-application Request Forms	Asbri Planning
Pre-application letter	Asbri Planning
Site Location Plan	Asbri Planning
Proposed site layout	AMT Design
Landscape Strategy	Tir Collective
Transport Technical Note	Asbri Transport
Illustrative Visual	AMT Designed

The pre-application response was overall favourable towards the development but recognised that there was a gap in the LDP as the specific tourism policies did not relate to a development of this nature. A summary of the key points raised within the response is provided below:

- It was considered unlikely that a suitable site within the designated boundaries would exist given the nature of the development, therefore it is considered acceptable to consider sites within the open countryside or adjoining the boundaries.
- The site has suitable links to the settlements of Caerwent and Caldicot that would provide easy access by both private vehicle and via sustainable modes of transport.
- Tourism is noted as being a key industry of the rural economy within Future Wales, PPW11 and TAN13, therefore adding support to the principle of development to provide holiday accommodation outside the settlement boundaries.
- Policy S11 (Visitor Economy) of the current LDP is the strategic policy relating to tourism. On the basis that the proposed development clearly demonstrates not adverse impact and provides a benefit in respect of the local economy it would be considered favourably.
- Policies T1 (Touring Caravan and Tented Camping Sites) and T2 (Visitor Accommodation outside Settlements) of the current LDP represent the more detailed planning policies do not cover a proposals of this nature/scale. Therefore, the development would be considered contrary to the detailed planning policies. However, the absence of detailed planning policy was considered to be a gap within the LDP and is not considered sufficient as to raise an objection to the proposed development subject to an economic and biodiversity benefit being demonstrated via a planning application.
- Any application would therefore need to be advertised and treated as a departure from the LDP.
- A significant amount of weight would be applied to the economic benefits generated from the site and proposal.

Detailed Comments

As aforementioned, Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) of the Replacement Local Development Plan provides the detailed framework against which tourism proposals will be assessed. The proposed wording of the Policy is as follows:

Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria:

a) *Is of a small scale appropriate to its context and a non-permanent nature that would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or*
b) *Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or*
c) *Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or*
d) *Relies upon a geographically fixed resource which exceptionally justifies the development; or*
e) *Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or*
f) *Demonstrates significant economic benefit to Monmouthshire.*

Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below:

g) *Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment;*
h) *Are of a scale, permanency and design appropriate to site context;*
i) *Incorporate sustainable and efficient resource use;*
j) *Have the necessary infrastructure capacity;*
k) *Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design;*
l) *Do not have an unacceptable amenity impact on occupiers of neighbouring properties.*

All tourism proposals must be evidenced with a 'Sustainable Tourism Need and Impact Assessment' (STNIA).
All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.

The pre-application response (Ref: DM/2023/00747) received from Monmouthshire County Council recognises that there is a gap in the current LDP for Policies relating to permanent holiday cabin type proposals which resulted in the development being considered a departure from the LDP. Similarly, it appears that provision for such developments is excluded from the wording of T1 in the proposed Replacement LDP but included in the support text of the policy. It is therefore suggested that the Policy is amended in the following manner to specifically include such developments. Text which is to be deleted is shown as ~~struck through~~ whilst new text to be added is shown in green.

Development proposals for sustainable tourism accommodation and facilities in the open countryside will only be permitted if the proposal can be justified against any of the following criteria:

a) *Is of a ~~small~~ scale appropriate to its context and ~~a non-permanent nature that~~ would cause no material harm to the landscape character and environmental/biodiversity quality of the surrounding area, either individually or cumulatively with other development in the area; or*
b) *Comprises permanently sited new accommodation such as static caravans, lodges and larger self-contained glamping units that require significant infrastructure requirements which is carefully considered and comprehensively justified; or*
c) *Contributes to agricultural diversification or an existing rural enterprise business and meets the criteria set out in S11 and RE3; or*
d) *Consists of the conversion/rehabilitation of an existing rural building meeting criteria set out within Policy H4; or*

e) *Relies upon a geographically fixed resource which exceptionally justifies the development; or*
f) *Is located within or adjacent to an existing visitor attraction or accommodation as ancillary development to established medium or large hotels.; or*
g) *Demonstrates significant economic benefit to Monmouthshire.*

Sustainable tourism proposals in the open countryside that accord with any of the criteria above must also meet all of the following criteria set out in (g)-(l) below:

h) *Protect, maintain and enhance landscape character, biodiversity, the resilience of ecosystems and the historic environment;*
i) *Are of a scale, permanency and design appropriate to site context;*
j) *Incorporate sustainable and efficient resource use;*
k) *Have the necessary infrastructure capacity;*
l) *Prioritise, promote and facilitate sustainable travel and have safe and efficient highway design;*
m) *Do not have an unacceptable amenity impact on occupiers of neighbouring properties.*

All tourism proposals must be evidenced with a 'Sustainable Tourism Need and Impact Assessment' (STNIA).
All tourism proposals are required to be short-stay only and not extend beyond a period of stay of 28 days.

In addition, it is proposed that the supporting text of the policy is amended as follows:

18.2.5 As set out in policies S11 and RE3, sustainable tourism uses can complement and help support farm businesses and Monmouthshire's rural economy. Tourism proposals in the open countryside should seek to re-use existing buildings within the farm unit/ farmstead. Proposals for new build tourist facilities such as glamping units located on farmland (outside of the farmstead away from existing buildings), must meet all the criteria (g) –(l) of Policy T1. New build proposals akin to new dwellings for holiday use will not be supported. Rural conversions to holiday let use can offer scope for a tourism use where they would normally be resisted for a residential use due to limited space and amenity, as they are intended to be used on a short-term basis and do not require additional paraphernalia.

<u>Allocation</u>
It is noted from reviewing the proposals map for the Replacement LDP that allocations for tourism development are absent. It is therefore proposed that tourism allocations are included within the plan and Caerwent Quarry is allocated as such.

In accordance with the requirements of new or amended sites submitted as part of representations to the Replacement Local Development Plan, the submission is accompanied by the pre-application submission which provides a plan of the site, details of the proposed use and documentation demonstrating that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. In addition, a Sustainability Appraisal is submitted in Appendix 3 of this letter.

<u>Conclusion</u>
This letter has been prepared on behalf of Mathen Estates in respect of a candidate site submission for tourism development at Caerwent Quarry, Caerwent, Caldicot and letter of consultation relating to tourism policies contained within the proposed Replacement Local Development Plan

The site's promoter is committed to delivering a sustainable, high quality tourism allocation on the Caerwent Quarry site in accordance with policies of the Replacement plan (both site-specific and plan-wide policies) through the candidate site submission process.

This letter follows a pre-application enquiry relating to the proposed development that recognised the absence of relevant policies within the adopted LDP. The changes are therefore proposed to the wording of relevant policies in the Replacement LDP to ensure that provision is included for such proposals and they are not considered departures from Local Planning Policy purely due to the lack of specific policies.

We look forward to the RLDP progressing and would welcome the opportunity to take part in relevant Hearing Sessions in relation to Policies S12 (Visitor Economy) and T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) specifically.

Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representation.



Appendix 1

Pre-Application Submission

Planning & Development Consultants
Ymghynghorwyr Cynllunio a Datblygu

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Date: 24th May 2023
Our Ref: JH/DG/JK: 23.101

Monmouthshire County Council
Monmouthshire County Council Planning Dept,
County Hall,
Rhadyr,
Usk, Monmouthshire,
NP15 1GA

Dear Sir or Madam,
Town and County Planning Act 1990 (As Amended)
Pre-application enquiry to Monmouthshire County Council
Proposed development of 59no. holiday cabins and associated works
Caerwent Quarry, Caerwent, Caldicot, NP26 5AH

Asbri Planning is instructed by [redacted] to engage Monmouthshire County Council in pre-application discussions in relation to the above site. It is proposed to develop a holiday cabin park on the site and the applicant seeks the local planning authority's view on the acceptability of these proposals prior to progressing with a full planning application.

Submission
In line with the Council's pre-application procedures, the following information is submitted to accompany the pre-application submission:

Document/drawing (reference where applicable)	Prepared by
Pre-application Request Forms	Asbri Planning
Pre-application letter	Asbri Planning
Site Location Plan	Asbri Planning
Proposed site layout	AMT Design
Landscape Strategy	Tir Collective
Transport Technical Note	Asbri Transport
Illustrative Visual	AMT Designed

The pre-application fee of £1600 (Level 4 Large Major Development) will be paid by the applicant to validate the pre-application enquiry.

Site Description and Background
The pre-application site comprises land at the Caerwent Quarry which is located between the rural village of Caerwent and small town of Caldicot. The site is irregular in shape and sits on the following grid coordinates E: 347320, N: 189469. The site extends to approximately 2.8ha.

The site is abutted to the west by Dewstow Road and to the east by Sandy Lane. The area is adjoined by agricultural fields to the north and south. Immediately to the west, the surrounding area comprises Dewstone Golf Club. To the east of the site, the area consists of agricultural land and farmsteads continuing on to the M48.

The site is considered to be brownfield, due to its previous use as a quarry. The land comprises rotovated land surrounded by exposed rock, gravel, scrub and woodland. The application site is heavily vegetated, particularly to the south.
A review of Natural Resources Wales Development Advice Map shows the site to lie outside a flood risk zone, meaning there is no risk of fluvial or tidal/coastal flooding.

A review of Historic Wales' online map search confirms that there are no Listed Buildings or Scheduled Ancient Monuments within or in close proximity to the site. The nearest Designated Historic Asset is the Caerwent Roman City located along Caerwent Road, some 800m to the north-west of the site. Intervening topography and landscape features and trees suggest that the development of this site would have no negative impact on this historic feature.

A review of Ordnance Survey shows a Public Rights of Way crossing the site along its northern boundary. A further public right of way runs to the south of the site, beyond the extent of the application boundary.

Approximately 700m to the south-east, there are a number of complimentary uses including convenience shops, restaurants and pubs.

Planning Context
A review of the Monmouthshire County Council Planning Registry shows that the following planning applications are relevant to this site:

- **DC/2007/00875** – A shed to store equipment and agricultural machinery. Refused 17th October 2007.
- **DC/2008/00635** – A shed to store equipment and agricultural machinery. Refused 9th July 2008.
- **DC/2012/00948** – Change of use of land to allow provision of three mobile unit holiday lodges. Refused 2nd May 2013.
- **DC/2016/00784** – Land reclamation scheme at Caerwent Quarry, Caerwent, including the import of (23,000m3) inert materials to create soil forming base to quarry for future after use as Agriculture. Withdrawn 20th March 2018.

Proposals
The pre-application enquiry is supported by an indicative layout and a landscape strategy which demonstrates the site is capable of accommodating 59no. permanent lodges with associated landscaping and ground re-profiling.

The proposals indicate 22no. 1bed/2people timber cabins, 32no. 2bed/4 people timber cabins and 5no. 3bed/6people timber cabins evenly spread across the site's area.

The proposed layout is considered to make the most effective use of the site given its opportunities and constraints. It is proposed to provide permeable internal roadway which corresponds to the site's shape. Lodges are proposed to be aligned alongside the internal roadway on both sides of the driveway. The proposal indicates the construction of the café/information centre point and parking area for coffee shop and information centre are proposed to the right of the site entrance.

Proposal includes the implementation of indicative indigenous soft landscape areas integrated into the site layout.

As illustrated within the Site Layout Plan Ref. 1022-AMT-XX-XX-DR-A-90, vehicular access to the site is to be attained via Dewstow Road which is to the west of the site.

Planning Policy

Introduction

The planning policy framework for the determination of this application is provided by national planning guidance, together with the statutory development plan. National planning policy is contained within the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 21 topic-based Technical Advice Notes (TANs), a number of which are relevant.

The statutory development plan for this site is currently provided by the Monmouthshire Local Development Plan adopted February 2014. This is supported by a number of topic specific supplementary planning guidance (SPG).

Planning Policy Wales

National planning policy is contained within the 11th edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 19 topic-based Technical Advice Notes (TANs), which are also relevant. PPW is the Welsh Government's principal planning policy document, setting out the context for sustainable land use planning policy, within which Development Plans are prepared and developed.
PPW provides a definition of sustainable development, taken from the Well-being of Future Generations Act (Wales) 2015 and states the following:

"*Sustainable development*" *means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.*

PPW sets out a number of Key Planning Principles, aimed towards *"Achieving the right development in the right place."* The five principles are:

- *Growing our economy in a sustainable manner;*
- *Making best use of resources;*
- *Facilitating accessible and healthy environments;*
- *Creating and sustaining communities; and*
- *Maximising environmental protection and limiting environmental impact.*

Paragraph 3.3 seeks to promote good design, stating that design must go beyond aesthetics and includes the social, environmental, economic and cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.

Section 5.5 of PPW11 relates to tourism and identifies tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.

Paragraph 5.4.2 states:

"The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim."

Paragraph 5.5.2 states:

"The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities."

Paragraph 5.5.3 states that:
"In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate. Development should be in nature and scale to the local environment."

Section 5.6 of PPW11 relates to the Rural Economy and identifies the rural economy must develop a wide base if it is to be adaptable and resilient to the challenges it faces now and in the future. Planning authorities should plan positively to meet rural employment needs by identifying policies in their development plans. By supporting the development of a broad range of employment opportunities in rural areas planning authorities can increase economic prosperity and help address the effects of rural decline or depopulation where it occurs. Greater opportunity can support and strengthen the future well-being and sustainability of rural communities.

Many commercial and light manufacturing activities can be located in rural areas without causing unacceptable disturbance or other adverse effects. Micro and small enterprises have a vital role to play in the rural economy, and contribute to both local and national competitiveness and prosperity.

To unlock the full potential of rural areas, planning authorities should adopt a positive approach to employment arising from the traditional agriculture, forestry and leisure sectors. Proposals for diversification, new startups and micro-businesses should also be encouraged, where appropriate, to generate new job and wealth-creating opportunities.

Future Wales
The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

Policy 5 of future Wales relates to supporting the rural economy. This states:

"The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and Local Development Plans must plan positively to meet the employment needs of rural areas including arising from the foundational economy; the agricultural and forestry sector, including ***proposals for diversification; start-ups and micro businesses.*** *The Welsh government also strongly* ***supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs."***

Technical Advice Notes (TANs)
Technical Advice Note 12: Design (2016)
In defining the notion of design, paragraph 2.1 states that it can help in articulating our nation and culture whilst helping in sustaining a positive image of Wales. Paragraph 2.5 warns that *'good design is not inevitable'*, in order to achieve it, it must embrace sustainability, architecture, place making, public realm, landscape, and infrastructure. Furthermore, the five objectives of good design are highlighted;

- *Access;*
- *Character;*
- *Community Safety;*
- *Environmental Sustainability; and*
- *Movement.*

TAN 12 includes advice on how promoting sustainability through good design may be facilitated through the planning system. Early consideration of design, well in advance of any planning application is essential to achieving good design. At the outset, appreciation of the site's context, and the development of a vision and agreed design objectives must be established and remain central to the evolutionary process.

Technical Advice Note 13: Tourism (1997)

TAN 13 (Tourism) provides advice on promoting and developing tourism in Wales and states that: *"In preparing development plans, local planning authorities should investigate the adequacy of facilities for both the static and touring caravanner and reconcile these needs with the protection of the environment. Holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation, while using less land for the purpose."*

Technical Advice Note 18: Transport (2007)

TAN 18 (Transport) confirms the integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 9.18 states that *"The extra trips generated by a proposed development may bring forward the need for transport improvements in the vicinity of the scheme, and beyond. To the extent that highway improvement works are necessary to enable a proposed development to go ahead, conditions may be imposed on the permission, making its commencement/ occupation subject to completion of those highway works. Alternatively, a developer may be invited to conclude an agreement under section 278 of the Highways Act 1980 for the provision of highway works."*

With regards to tourism, particularly in rural areas, the TAN *advises 'developments should demonstrate access by a choice of modes to avoid locking in the requirement for travel by car. Even small-scale tourist facilities that rely on car-based travel can offer public transport information or arrange pick-ups from rail stations or coach/bus stops. In rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area.'*

Technical Advice Note 23: Economic Development (2014)

Paragraph 1.1.1 of TAN 23 (Economic Development) broadly defines economic development so that it can include any form of development that generates wealth, jobs and income, with paragraph 1.1.2 stating that:

- *Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;*
- *An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;*
- *Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.*

Monmouthshire County Council Adopted Local Development Plan

The following policies, contained within the adopted LDP are considered to be of most relevance to this particular pre-application enquiry;

Policy reference	***Relating to***
Strategic Policies	
S8	Enterprise and Economy
S10	Rural Enterprise

S11	Visitor Economy
S12	Efficient Resource Use and Flood Risk
S13	Landscape, Green Infrastructure and the Natural Environment
S15	Minerals
S16	Transport
S17	Place Making and Design
Development Management Policies	
CRF2	Outdoor Recreation/Public Open Space and Allotment Standards and Provision
RE6	Provision of Recreation, Tourism and Leisure Facilities in Open Countryside
T2	Visitor Accommodation Outside Settlements
SD2	Sustainable Construction and Energy Efficiency
SD4	Sustainable Drainage
LC1	New Built Development in the Open Countryside
LC5	Protection and Enhancement of Landscape Character
GI1	Green Infrastructure
NE1	Nature Conservation and Development
EP1	Amenity and Environmental Protection
EP2	Protection of Water Sources and Water Environment
EP3	Lighting
EP5	Foul Sewage Disposal
M2	Minerals Safeguarding Zone
MV1	Proposed Developments and Highway Considerations
MV2	Sustainable Transport Access
MV3	Public Rights of Way
DES1	General Design Considerations
DES4	Advance Tourism Signs

Strategic Policy 10 relates to Rural Enterprise developments, stating *'Development to enable the diversification of the rural economy will be permitted outside settlement development boundaries where it is of a scale and type compatible with the surrounding area and will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value. Development must re-use or adapt existing buildings where possible. The exceptional circumstances in which new buildings may be permitted outside settlement boundaries to assist in the diversification of the rural economy are set out in Policies RE1, RE3, RE6, T2 and T3.'*

Of the above policies mentioned, policies RE6 and T2 are of most relevance as they relate to tourism and leisure-developments. Additionally, the application must be assessed against policy LC1 as this relates to new built development in the open countryside.

Policy RE6 relates to Provisions of Recreation, Tourism and Leisure Facilities in the Open Countryside. This policy states:

'Development proposals for recreation, tourism and leisure uses in the countryside will be permitted provided that they are of a small-scale, informal nature and subject to detailed planning considerations, including adequate safeguards for the character and appearance of the countryside (particularly its landscape, biodiversity and local amenity value). Development must re-use or adapt existing buildings where possible. In exceptional circumstances new buildings of an appropriate scale may be acceptable where justified and where the proposal meets the criteria set out in Policy LC1.'

Policy LC1 provides the criteria for the exceptional circumstances where developments in the open countryside would be accepted, of which leisure and tourism is identified. The policy advises the following:
In such exceptional circumstances, new built development will only be permitted where all the following criteria are met:

a) the proposal is satisfactorily assimilated into the landscape and complies with Policy LC5;
b) new buildings are wherever possible located within or close to existing groups of buildings;
c) the development design is of a form, bulk, size, layout and scale that respects the character of the surrounding countryside; and
d) the development will have no unacceptable adverse impact on landscape, historic / cultural or geological heritage, biodiversity or local amenity value'

Policy T2 is also appropriate as it relates to visitor accommodation outside settlements. However, it must be acknowledged that this policy relates to the permanent serviced or self-catering visitor accommodation which is not what is being applied for as part of this pre-application enquiry. As such, it is not considered to be of relevance and the appraisal of the development does not fall within this policy.

Supplementary Planning Guidance (SPGs)
The following Supplementary Planning Guidance (SPGs) are relevant to the proposal:

- Green Infrastructure (April 2015)
- Monmouthshire Parking Standards (January 2013)

Appraisal
Principle of Development and Visual Impact
With regards to the development of a visitor accommodation on the site, the proposals must be considered with reference to national planning guidance and key tourism policies within the LDP including strategic policies S10 and S11 as well as policy LC1 and RE6.

The proposed scheme is considered to address national and local level planning policy requirements and ambitions and will provide the applicant with an opportunity to grow a local business in turn contributing to the local economy and enhancing the tourism accommodation provision in the area. It is considered that the scheme is compatible and complementary to its context with the scheme's design considered to enhance the established vernacular in this area of Caerwent.

Whilst positioned beyond the defined settlement boundary for LDP purposes, the proposal is considered wholly appropriate and line with LDP policies S10, LC1 and RE6, which allows development and the diversification of the rural economy outside settlement development boundaries providing it:

- is of a scale and type compatible with the surrounding area;
- will cause no unacceptable harm to the surrounding landscape, historic and cultural heritage, biodiversity or local amenity value;
- is of a small-scale and informal in nature;
- includes adequate safeguards for the character and appearance of the countryside;
- is satisfactorily assimilated into the landscape; and
- respects the character of the surrounding countryside

Considering the above, it is clear from the accompanying proposals the proposed development is sensitively located to ensure that it will not have a detrimental impact upon the amenity of existing properties and the

neighbourhood and will assimilate into the existing landscape to ensure it adheres to the local character. The proposed lodges will provide an appropriate redevelopment of a brownfield site (given its previous use as a quarry) and will be screened from surrounding roads and properties by rows of mature trees. Visual impact will be softened by undulating topography of the site on a lower elevation.

All proposals will be subject to detailed planning considerations, which include the protection of the natural and built heritage which itself is an important resource bringing benefits for the economy, tourism and wellbeing. The application will be accompanied by a Landscape and Visual Impact Assessment to demonstrate the scheme's impact on the landscape.

In addition to the above, it's important to consider the proposal would undoubtedly provide a strong form of economic development that would assist in the continued development of the tourist economy in Monmouthshire. The proposal is considered to be both innovative and would result in the diversification of business base within Monmouthshire providing a leisure complex that would drawn in custom from wide afield.

The Impact on The Character and Appearance of the Area
The nature of the development proposed is green in appearance with this being a key and distinctive feature for the business. The proposal would make use of and develop upon the existing contours and the trees and hedgerows that forms the site and its boundaries, in accordance with section 5.5 and 5.6 of PPW11 which recognise that planning authorities should plan positively for active, green and cultural tourism where they are appropriate and consistent in nature and scale to the local environment.

The Impact on the Surrounding Highway Network
The proposal would likely generate more traffic movements to and from the site, however, this will be minimal and managed through the tourism development. Car park will be incorporated within the proposed development in accordance with the Monmouthshire parking standards. The application will be accompanied by a Transport Statement which will assess the impact of development on the highway network.

Biodiversity
With regard to biodiversity any subsequent application would be supported by the relevant ecological and arboricultural surveys.

Conclusion
The site is considered to offer the potential for sustainable tourism and leisure development that is compliant with national and local planning policy.

As part of this pre-application enquiry, advice on the following matters is sought:

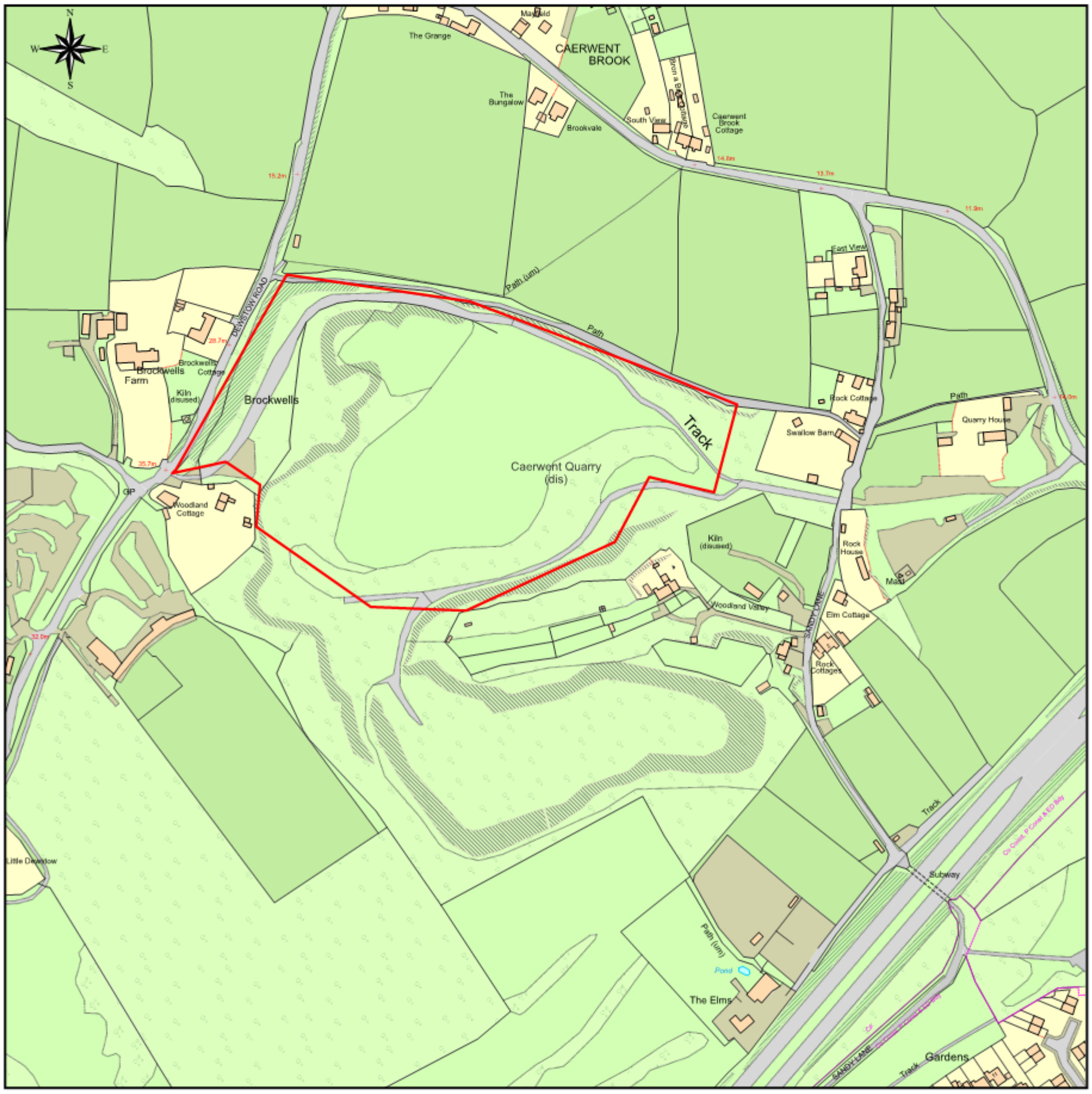
1. Confirmation on the principle of development;
2. Discussion on the proposed scale of development;
3. Discussion on the form and indicative layout that would be considered acceptable in this location;
4. Discussion regarding the proposed impact on highways;
5. Discussion on the green infrastructure and the impact on the public right of way;
6. S106 Obligations required to support the development, and
7. Documents required to support a full planning application.

we would be grateful if we could agree with officers the scope of any required supporting information that would be required to be submitted alongside any forthcoming planning application and would be happy to discuss any other issues the LPA considers pertinent to the consideration of the development of the site.

I look forward to hearing details of the name of the case officer who will be looking at this enquiry and if you have any queries in the meantime, please do not hesitate to get in touch.

Yours sincerely





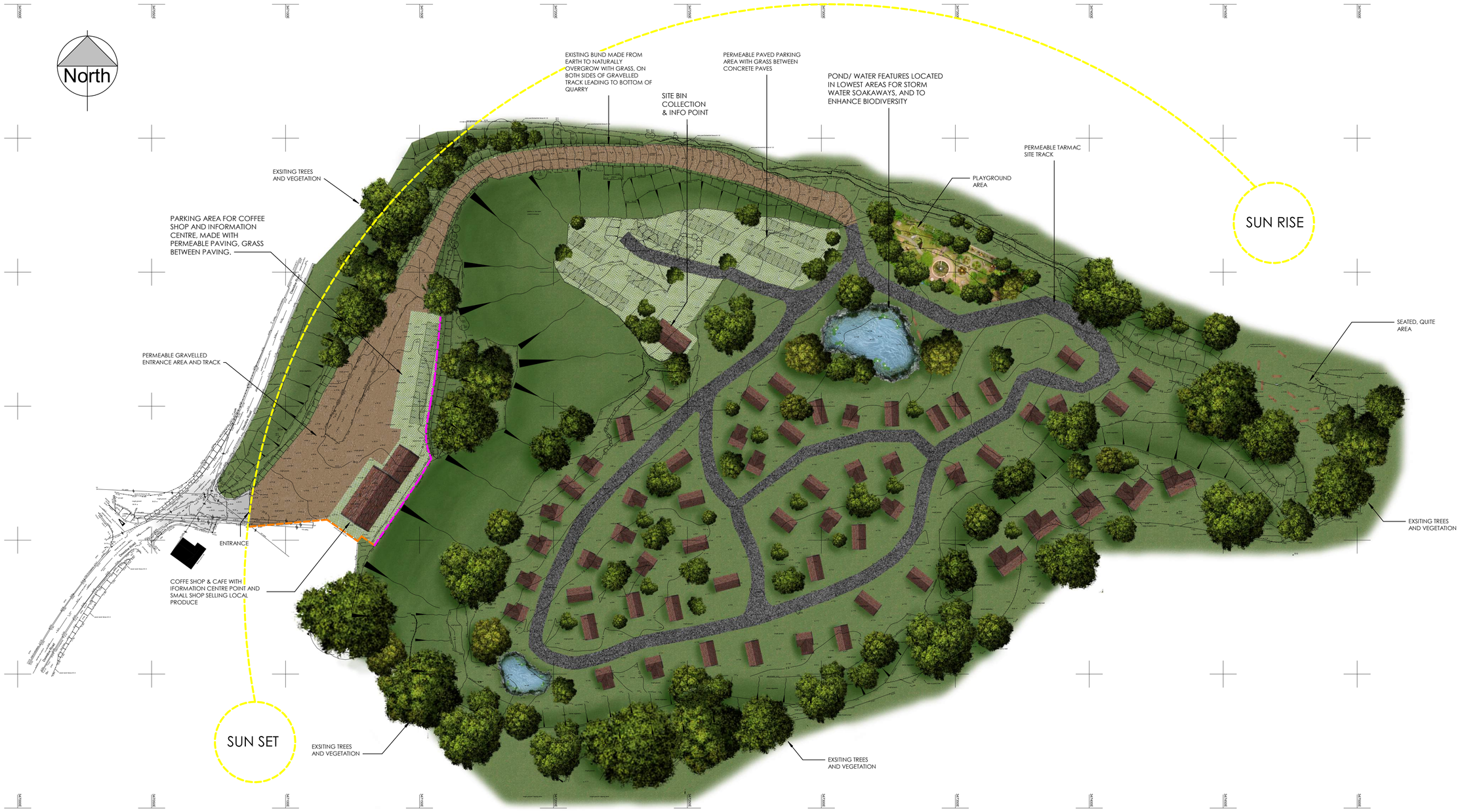
This Plan includes the following Licensed Data: OS MasterMap Colour PNG Site Plan by the Ordnance Survey National Geographic Database and incorporating surveyed revision available at the date of production. Reproduction in whole or in part is prohibited without the prior permission of Ordnance Survey. The representation of a road, track or path is no evidence of a right of way. The representation of features, as lines is no evidence of a property boundary. © Crown copyright and database rights, 2023. Ordnance Survey 0100031673

Scale: 1:5000, paper size: A4

Ordnance Survey Licensed Mapping

emapsite™ plans

Prepared by: Kate Stevens, 24-05-2023



Caerwent Quarry - Site Layout

SCALE 1:750 @ A1

DENOTES GRASSED AREAS AND EMBANKMENTS

DENOTES PERMEABLE TARMAC SITE ROAD

DENOTES PERMEABLE GRAVEL TRACK LEADING INTO QUARRY

DENOTES PERMEABLE CAR PARK PAVING, CRISS CROSS PAVING WITH GRASS BETWEEN

DENOTES EXISTING AND PROPOSED TREES FOR FINAL DEVELOPMENT

DENOTES BOUNDARY LINE

DENOTES 1.8m FAUNA FRIENDLY HIGH TIMBER CB FENCE, WITH HEDGEHOG HOLES

DENOTES 1100mm HIGH FAUNA FRIENDLY TIMBER FENCE, WITH HEDGEHOG HOLES

DENOTES 22 NO. 1 BED/ 2 PEOPLE TIMBER CABINS

DENOTES 32 NO. 2 BED/ 4 PEOPLE TIMBER CABINS

DENOTES 5 NO. 3 BED/ 6 PEOPLE TIMBER CABINS

REVISIONS			
Mark	Date	Details	By

Client:

Drawing Originator:

AMT Design

www.amtdesigned.com
matt@amtdesigned.com
Phone: 07868297709

FOR THE ORIGINAL SIZE OF A1

Drawn	Checked	Director:	Date:	Scale:
MLM	MLM	MLM	11.04.22	As indicated

Drawing Status:

FOR INFORMATION ONLY

Project Title:

Caerwent Quarry
Caldicot

Drawing Title:

Proposed Site Layout

Drawing No:

Project	Origin	Vol.	Level	Type	Discip.	Sheet Number
1022	AMT	XX	XX	DR	A	90

Monmouthshire County Council
Development Management - Pre-Application Advice – Request Form

Reference Number ……23.101…….. (Internal Use Only)

This form is also available via the council's website: www.monmouthshire.gov.uk

Please refer to the Pre-Planning Application Guidance Notes to assist you in completing this form. All personal information will be processed in accordance with our Privacy Notice (see summary below).

1. Applicant details

Name: [redacted]

[redacted]

Tel no.: [redacted] Email:

Preferred means of contact:

Agent details (if applicable)

Name: [redacted]

Address: [redacted]

Tel no.: [redacted] Email: [redacted]

Preferred means of contact:

2. Type of service you require (please see Guidance Notes or Charging Schedule for further information). Please tick relevant level.

Monmouthshire's Bespoke Pre Planning Service:-

- ☐ Level 1 Householder £120.00 (+any additional officers if required +£75)
- ☐ Level 1 Advertisements £120.00
- ☐ Level 2 Minor development £290.00 (+any additional officers if required + £95)
- ☐ Listed Building £350
- ☐ Level 3 Major development £1200.00

Standard Statutory National Planning Service:-

- ☐ Level 1 Householder £25.00
- ☐ Level 2 Minor development £250.00
- ☐ Level 3 Major development £600.00
- ☐ Level 4 Large Major development £1000.00

[redacted]

- **If your proposal is non-starter you will be refunded the fee, less an administration charge of £18**

3. Location of proposed development:

Please provide a site location plan with the site edged in **red**

Site address: Caerwent Quarry, Caerwent, Caldicot, NP26 5AH

Is this property Listed? Please tick.

Yes ☐ No X

4. Current (or last known) land use:

Quarry

5. Description of your proposal (including an indication of increase in floor space, and/or number of new units proposed):

Proposed development of 59no. holiday cabins and associated works

6. Plans and supporting information submitted:

- Pre-application letter

-Site Location Plan

- Proposed site layout

- Landscape Strategy

- Transport Technical Note

-Illustrative Visual

Transport Note

7. Other relevant Pre application or Application references that you are aware of. (This will help us to allocate your case and check the history)

Please refer to the accompanying Cover Letter

8. Other Information:

8. Fees:

Amount paid [redacted]

(Cheques made payable to Monmouthshire County Council)

Please ensure that the correct fee has been paid for this enquiry. Please also ensure payment is submitted with this request for advice by cheque or at time of submission over the telephone by card as it will not be processed without payment. **Tel: 01633 644 355 to make a payment.**
9. Sign: [redacted] Print name: [redacted] **All personal information provided will be processed in accordance with our Privacy Notice – see summary below.** **For details regarding Freedom of Information requests and commercial prejudice – see below**
10. Date submitted: 24/05/2023

Please return this form to:
Email: planning@monmouthshire.gov.uk

Hysbysiad Preifatrwydd Data Cryno

Sut y byddwn yn defnyddio'ch gwybodaeth

Mae angen prosesu eich data personol gan Gyngor Sir Fynwy er mwyn cyflawni gweithred gyhoeddus. Heb y wybodaeth hon, ni all yr Adran Reoli Datblygu o fewn y Cyngor gyflawni eich cais am gyngor cyn-ymgeisio.

Ni chaiff eich manylion personol eu rhannu ymhellach, oni bai mewn perthynas â diogelu neu rwymedigaethau cyfreithiol eraill.

Bydd eich cofnodion yn cael eu storio a'u cadw'n ddiogel yn unol â'n polisi cadw, oni bai bod angen i ni eu cadw o dan sail gyfreithlon arall.

Mae gennych nifer o hawliau mewn perthynas â'r wybodaeth, gan gynnwys yr hawl i gael mynediad at wybodaeth sydd gennym amdanoch chi a'r hawl i gwyno os ydych yn anfodlon gyda'r modd y mae eich gwybodaeth yn cael ei phrosesu. Am ragor o wybodaeth am sut rydym yn prosesu'ch gwybodaeth a'ch hawliau, cliciwch ar y ddolen ganlynol:
http://www.monmouthshire.gov.uk/app/uploads/2018/04/ENTPH001-Privacy-Notice.docx

Os bydd angen i chi wneud cwyn am y ffordd y mae eich data wedi'i brosesu, cysylltwch â dataprotection@monmouthsire.go.uk neu os nad ydych chi'n llwyr fodlon, gallwch gysylltu â Swyddfa'r Comisiynydd Gwybodaeth ar-lein yn https://ico.org.uk/about-the-ico/other-languages/welsh/welsh-complaints/ neu drwy eu llinell gymorth: 0303 123 1113

Data Privacy Summary Notice

How we will use your information

Processing of your personal data by Monmouthshire County Council (MCC) is necessary to perform a public task. Without this information, the Development Management Department within MCC may not be able to fulfil your request for pre-application advice.

Your personal details will not be shared further, unless in relation to safeguarding or other legal obligations.

Your records will be safely stored and retained in line with our retention policy, unless we need to retain under another lawful basis.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right to complain if you are unhappy with the way your information is being processed. For further information on how we process your information and your rights please click the following link:
http://www.monmouthshire.gov.uk/app/uploads/2018/04/ENTPH001-Privacy-Notice.docx

Should you need to make a complaint about the way your data has been processed, please contact dataprotection@monmouthsire.go.uk or if you are not fully satisfied you may contact the Information Commissioner's Office online at www.ico.org.uk/concerns or via their helpline: 0303 123 1113

Freedom of Information

Freedom of Information

If the Local Planning Authority receives a request, under the Freedom of Information Act (FOI) or Environmental Information Regulations (EIR), to disclose information relating to this pre-application enquiry they are obliged to do so unless the information is deemed exempt under the Act. Note. We can only withhold information under FOI or EIR if the information falls under one of the exemptions (FOI) or exceptions (EIR) set out in legislation.

For certain pre-application issues you can complete the Commercial Prejudice form which will set out the reasons why, and for how long, you feel any information relating to the case needs to remain confidential. However, whilst we will take account of these views, the final decision on whether the information should be withheld rests with the Council. The Council maintains compliance to the Data Protection Act and we will not release any personal information to third parties.

Caerwent Quarry: Landscape Strategy




Native tree planting


Native tree planting


Hazel coppice between units


Dogwood between units


Annual meadow at key areas


Native shrubs


Wildflowers to trees/woodland


Flowering lawn between units

The landscape proposals for Caerwent Quarry would seek to retain existing vegetation around the periphery of the site and any individual trees elsewhere.

Proposed planting would include groups of native trees, hazel coppice and dogwood planted between the proposed units with understorey species-rich grass/long grass and wildflowers. Short grass areas would be kept to a minimum adjacent to the units only, to reduce the amount of grass cutting across the site and to increase biodiversity.

Native trees would include Acer campestre (field maple), Prunus avium (wild cherry), Betula pendula (birch), Quercus robur (oak), and Sorbus aucuparia (rowan). The trees would provide seasonal and visual interest.

Native trees and shrubs could be plated on the existing embankments being retained, which would include Crataegus monogyna (hawthorn), field maple (Acer campestre), Euonymus europeas (spindle), Viburnum opulus (guelder rose), Frangula alnus (buckthorn) and Corylus avellana (hazel). The planting would enhance biodiversity, visual interest and enhance green infrastructure and wildlife corridors.

Species-rich grass and annual meadow planting could be implemented around the SuDS basins. The basins could incorporate stepping logs and boulders for informal play opportunities. Throughout the site, rain gardens and other SuDS would be introduced to help with cleaning rainwater runoff from the access road and roofs of the units. The rain gardens would be planted with herbaceous plants and shrubs for seasonal interest.

To the north, an equipped area for play would be provided. This could be combined with informal features such as logs and boulders, hazel coppice, and long grass areas for natural play. A seating area for picnics and relaxation is proposed at the northeast.

Throughout the site there could be opportunities for bird and bat boxes, and bird feeding stations, subject to any ecology surveys, to enhance habitat creation and to provide further interest for the users of the site.

Not to scale 16 May 2023

tir collective LANDSCAPE ARCHITECTS

TC23127 Caerwent Quarry Sk.1v1

Project Number	T23.124	**Project Name**	Caerwent Quarry
Contact/Participants	Beacon Estates	**Date**	18 May 2023
Noted by	Asbri Transport		
Subject	Pre-Application Transport Note		

Technical Note

1 Introduction

1.1 Background

1.1.1 Asbri Transport Limited have been appointed by Beacon Estates to produce a Technical Note in support of a pre-application submission for a proposed tourism development at Caerwent Quarry, Caldicot, Monmouthshire.

1.1.2 The former quarry is located northwest of Caldicot centre, to the west of the M48 and south of the A48. The site location is shown in **Figure 1.1**.



Figure 1.1 Site Location

1.2 Purpose of the Report

1.2.1 This report will detail the likely transport characteristics of the proposed development and identify the potential impact of the proposals on the surrounding transport network.

1.3 Structure of the Report

1.3.1 Following this introductory chapter, the report is structured as follows:

- Section 2 describes the existing transport conditions surrounding the development and reviews personal injury accident data for the study area;
- Section 3 outlines the development proposals;
- Section 4 considers the likely demand generated by the proposed development;
- Section 5 provides the conclusions of the report.

2 Existing Situation

2.1 Introduction

2.1.1 In order to assess the impact of the development proposals, it is necessary to establish the conditions that exist within the surrounding transport network. This section of the report therefore describes the current highway network, together with a description of the existing transport infrastructure including public transport, pedestrian and cycle facilities.

2.2 Site Location

2.2.1 As discussed, the development is located approximately 1.5km northwest of Caldicot centre, Monmouthshire. The site is located on the former Caerwent Quarry and is surrounded in all directions by greenfield, being a mixture of agricultural land and the Dewstow Golf Club top the west.

2.3 Highway Network

2.3.1 The highway network within the immediate vicinity of the site is shown in **Figure 2.1.** Vehicular access to/from Caerwent Quarry is provided by an existing priority T-Junction on Dewstow Road, just to the north (150m) of the entrance to Dewstow Golf Club.



Figure 2.1 Local highway network

Dewstow Road

2.3.2 Dewstow Road, located immediately to the west of Caerwent quarry is a single carriageway road that runs in a north-south alignment.

2.3.3 There is no street-lighting present and the road is subject to a speed limit of 60mph within the vicinity of the site. To the north, Dewstow Road forms a priority junction with Church Road, giving way to vehicles on Church Road.

2.3.4 To the south the road continues at national speed limit until the bridge over the M48 where speed limits are restricted to 30mph until the road connects with the B4245 at a priority T-junction on the western side of Caldicot.

2.3.5 Dewstow Road lacks footways and lighting provision and is semi-rural in character.

Church Road

2.3.6 Church Road is a single carriageway road, which runs between Caldicot town centre, via Caldicot Castle to the east of the proposed development site and the A48 in the village of Caerwent to the north.

2.3.7 To the east of Dewstow Road, Church Road is initially rural in nature and subject to the National Speed Limit, until it crosses over the M48 and immediately enters Caldicot and changes nature to be suburban/urban with a 30mph speed limit.

2.3.8 To the north of Dewstow Road, Church Road is again rural in nature with a National Speed Limit for 150m until it enters the village of Caerwent where a 30mph speed limit is in force. In the centre of Caerwent the road splits to the east and west following the old A48 connecting with the A48 Caerwent Bypass at priority T-junctions to the east and west of the village.

A48

2.3.9 The A48 is part of the Strategic Road Network generally running east-west through south Wales. In the vicinity of Caerwent Quarry the A48 runs east-west the form of a single carriageway road proving a bypass just to the north of the centre of Caerwent, being subject to a 30mph speed limit Caerwent and 50mph to the east and west.

2.3.10 To the west of Caerwent the A48 continues as a single carriageway rural road towards Newport, while to the east it becomes a dual carriageway until Crick, reverting to a single carriageway under the m48 and towards Chepstow.

2.4 Active Travel

2.4.1 Pedestrian and cyclist infrastructure within proximity of the development site is shown in **Figure 2.2.**

Pedestrians

2.4.2 As described above, the site access lacks footways at the site access and surrounding areas, reflecting the rural nature of the site and Dewstow Road.

Cycling

2.4.3 As can be seen from **Figure 2.2,** NCN route 4 runs at the eastern boundary of the development site.

2.4.4 NCN Route 4 is a long-distance route between London and Fishguard via Reading, Bristol, Newport, Swansea, Carmarthen, Tenby and St. David's. Locally, NCN route 4 provides links into Caldicot, Caerwent and Chepstow.



Figure 2.2 Pedestrian & cyclist infrastructure within proximity

Active Travel Network Map

2.4.5 The Welsh Government Active Travel Network Maps show future walking and cycling routes to be subject to feasibility studies. These are depicted in **Figure 2.3** below.



Figure 2.3 Active Travel Network map

2.4.6 As can be seen from the above, Caldicot itself has existing walking and cycle routes linking to the areas of Caldicot and Caldicot railway station.

2.4.7 Sandy Lane and Church Road have been identified as future walking and cycling routes.

2.5 Public Transport

2.5.1 Public transport infrastructure within the vicinity of the development site is shown in **Figure 2.4**, below.

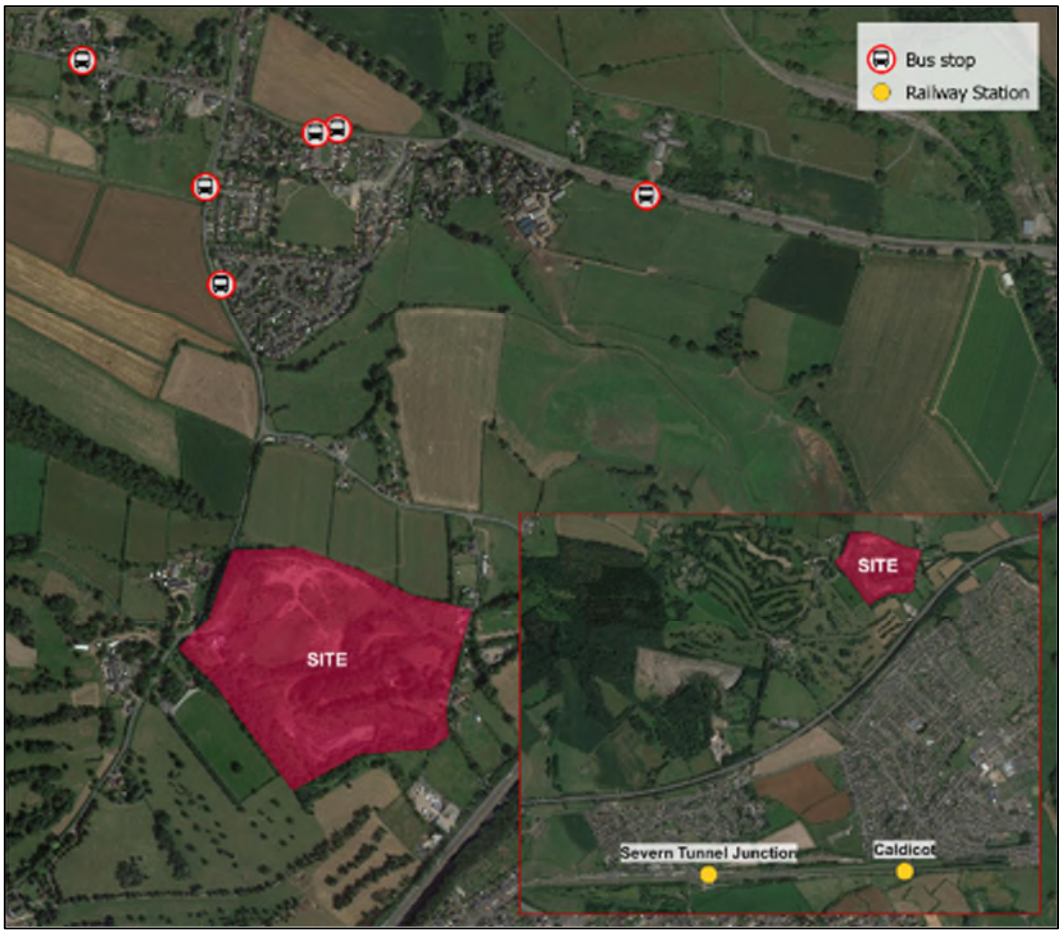


Figure 2.4 Public transport infrastructure within proximity

Bus

2.5.2 The nearest bus stop to the proposed development site is located on Church Road, 1km north of the development site in Caerwent, which has a number of bus stops within the village.

2.5.3 From this bus stop, a northbound and southbound bus service is available. The northbound stop has a raised kerb and bus flag with timetable information whilst the southbound stop has a raised kerb only.

2.5.4 Services operating from here and the surrounding bus stops are detailed in **Table 2.1.** The bus service no. 73 provides a link between Newport Friars Walk Bus Station and Chepstow Bus Station, connecting the developing site to Newport, Chepstow and the wider bus networks.

2.5.5 From Newport Friars Walk Bus Station, Newport Railway Station is located a 600m walk and from Chepstow Bus Station, Chepstow Railway Station is located a 650m walk connecting the development site to the railway network.

Route No.	Destination	Frequency
73	Newport - Chepstow	Mon-Fri: ~ hourly from 07:27-18:42 Sat: Every 2 hrs from 08:37-16:47
	Chepstow - Newport	Mon-Fri: ~ hourly from 08:21-18:26 Sat: Every 2 hrs from 10:21-18:21
75	Caldicott Cross - Caerwent - Sudbrook	Mon-Sat: Every 2 hrs from 08:37-18:37. Bus returns loop Every 2hrs from 08:44-16:44

Table 2.1 bus services within proximity

Rail

2.5.6 The nearest railway station to the proposed development is Caldicot railway station. This is assessable 2.6km walk from the development site.

2.5.7 Caldicot railway station benefits from being situated on the South Wales Main Line where frequent services pass by. From this station, services are available to;

- Maesteg (calling at Newport & Cardiff Central)
    - Mon-Sat: ~ hourly from 06:25-23:48
    - Sun: every 2 hrs from 06:25-23:17
- Nottingham
    - Mon-Sat: 07:07 & 20:17
    - Sun: 07:07

2.6 Highway Safety

2.6.1 Personal Injury Collision (PIC) data was obtained from Welsh Government Open Data for the most recent 5-year period available (2017-2021). Collisions occurring within proximity of the development site are shown in **Figure 2.5** below and summarised in **Table 2.2.**

2.6.2 As can be seen from the above, there have been a total of 3 collisions occurring on Dewstow Road and surrounding areas. Of these collisions, 0 pedestrians and 1 cyclist have been involved. The 3 collisions have resulted in 3 casualties with the involvement of 5 vehicles.

2.6.3 It can be observed that there are no collision clusters of concern within the extent of the study area.



Figure 2.5 PIC analysis

Year	No. Personal Injury Collisions				Pedestrians	Cyclists	Vehicles	Casualties
	Fatal	Serious	Slight	Total				
2017	0	1	0	1	0	1	2	1
2018	0	0	2	2	0	0	3	2
2019	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0
Total	**0**	**1**	**2**	**3**	**0**	**1**	**5**	**3**

Table 2.2 PIC analysis summary

3 Development Proposals

3.1 Land Use

3.1.1 As discussed, the scheme proposes a tourism development at Caerwent Quarry, Caldicot, Monmouthshire.

3.1.2 The development will consist of;

- Coffee shop and café with information centre point and small shop selling local produce

- 22 x 1 bed/2 people timber cabins
- 32 x 2 bed/4 people timber cabins
- 5 x 3 bed/6 people timber cabins

3.1.3 The site layout for the proposed can be found at **Appendix A.**

3.2 Access

Vehicular

3.2.1 Vehicular access will be achievable via the existing access to the site. This is shown within **Photograph 3.1.**



Photograph 3.1 Site access

Servicing

3.2.2 The site layout proposed a site bin collection and information point (shown in **Appendix A).** Refuse collection vehicles will be able to access the site via the main vehicular entrance.

Pedestrian & Cyclist

3.2.3 The location of the development immediately adjacent to NCN 4 raises the opportunity of for providing direct access to Caldicot and Caldicot Castle (within 1 km) via the eastern side of the proposed development for pedestrians and cyclists.

3.3 Parking

Vehicular

3.3.1 Parking for vehicles will be provided in accordance with the Monmouthshire Council Parking Standards. While there is no specific standard for such a Tourism Land Use those for hotels a shown below have been used to provide an indicative amount of as follows:

- 26 x parking spaces for coffee shop
- 60 x parking spaces for accommodation

3.3.2 There is no appropriate land use category set out within the framework for the proposed tourism development and therefore the car parking standards for hotels and hostels has been applied. This is summarised in **Table 3.1**.

Type of Development	Operational	Non-operational
Hotels	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per bedroom
Cafes & Drive-Thru Restaurants	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 14m² of dining area

Table 3.1 Monmouthshire car parking standards

Pedestrian & Cyclist

3.3.3 Secure cycle parking would be provided in accordance with the needs of staff and visitors and in accordance with the Monmouthshire Council Parking Standards. While there is no specific standard for such a Tourism Land Use, we would suggest, given the nature of the development and the sites location adjacent to the National Cycle Network, that each lodge would be provided with secure cycle parking for at least 1 bicycle.

4 Trip Generation

4.1 Introduction

4.1.1 This section of the report outlines the likely volumes of traffic generated by the development.

4.1.2 The vehicular trip generation rates have been derived from the 7.10.1 TRICS database to inform the likely vehicle movements associated with the proposed development.

Weekday

4.1.3 Sites have been selected on the basis of following criteria:

- Land use: Residential – Holiday accommodation
- Survey days: Monday – Friday;
- Number of units; 65
- Location of development: UK, Greater London, Northern Ireland and Republic of Ireland.

Weekend

4.1.4 Sites have been selected on the basis of following criteria:

- Land use: Residential – Holiday accommodation
- Survey days: Saturday – Sunday;
- Number of units; 65 – 295
- Location of development: UK, Greater London, Northern Ireland and Republic of Ireland.

4.2 Trip Generation

4.2.1 The peak hour trips are detailed in **Table 4.1**, below.

Time	Trip rate per unit			Trip rate (59 units)		
	Arrivals	Departures	Totals	Arrivals	Departures	Totals
Weekday						
08:00-09:00	0.369	0.169	0.538	22	10	32
17:00-18:00	0.815	0.431	1.246	48	25	74
Weekend						
14:00-15:00	0.164	0.122	0.286	10	7	17

Table 4.1 Weekday & weekend trip rates

4.2.2 As detailed in **Table 4.1**, the development is likely to generate up to 32 two-way vehicle movements during the weekday AM peak hour and 74 two-way vehicle movements during the weekday PM peak hour.

4.2.3 During the weekend, the development is likely to generate up to 17 two-way vehicle movements.

4.3 Impact

4.3.1 It is considered that the level of traffic predicted to be generated by the proposed development will not have a material impact on the performance of the surrounding highway network.

5 Summary & Conclusion

5.1.1 Asbri Transport Limited have been appointed by Beacon Estates to produce a Technical Note in support of a pre-application submission for a proposed tourism development at Caerwent Quarry, Caldicot, Monmouthshire.

5.1.2 The trip generation rates have been obtained from the TRICS generation database and the analysis has concluded that the development is likely to generate up to 32 two-way vehicle movements during the weekday AM peak hour and 74 two-way vehicle movements during the weekday PM peak hour.

5.1.3 Car parking and cycle parking is to be provided to fulfil the requirements of the development and be in accordance with Monmouthshire County Council's Car Parking Standards.

5.1.4 It is considered that the proposed development will have a negligible impact on the operational performance of the local highway network.

Caerwent Quarry – Illustrative Visual

Below renders were prepared by AMT Designed Architecture to present the precursor of 1 storey timber cabins in the proposed glamping development in Caerwent Quarry.







Appendix 2

Pre-Application Response (Ref: DM/2023/00747)

Monmouthshire County Council

Development Management Services

Pre-Application Advice – Written Response

1	Ref No: DM/2023/00747
2	Site Address: Caerwent Quarry, Sandy Lane, Caerwent Brook, Caerwent, Monmouthshire,
3	We understand your proposal to be: Proposed development of 59no. holiday cabins and associated works.
4	What information our advice is based on: Site visit dated and the following supporting plans: Landscape Strategy - , Illustrative Visual - , - , Cover Letter - , 1022 AMT XX XX DR A 90 - , Transport Note - ,
5	Planning Policies you need to be aware of: <u>Local Development Plan (LDP):</u> DES1 LDP General Design Considerations EP1 LDP Amenity and Environmental Protection EP3 LDP Lighting EP5 LDP Foul Sewage Disposal GI1 LDP Green Infrastructure LC1 LDP New Built Development in the Open Countryside LC5 LDP Protection and Enhancement of Landscape Character MV1 LDP Proposed Developments and Highway Considerations MV2 LDP Sustainable Transport Access MV3 LDP Public Rights of Way NE1 LDP Nature Conservation and Development RE6 LDP Provision of Recreation, Tourism and Leisure Facilities in Open

	Countryside S10 LDP Rural Enterprise S11 LDP Visitor Economy S12 LDP Efficient Resource Use and Flood Risk S13 LDP Landscape, Green Infrastructure and the Natural Environment S15 LDP Minerals S16 LDP Transport S17 LDP Place Making and Design SD1 LDP Renewable Energy SD2 LDP Sustainable Construction and Energy Efficiency SD3 LDP Flood Risk SD4 LDP Sustainable Drainage T2 LDP Visitor Accommodation Outside Settlements M2 LDP Minerals Safeguarding Areas <u>Supplementary Planning Guidance (if any):</u> Sustainable Tourism Accommodation SPG November 2017: https://www.monmouthshire.gov.uk/app/uploads/2016/10/Sustainable-Tourism-Accommodation-SPG-November-2017.pdf Renewable Energy and Energy Efficiency SPG March 2016: http://www.monmouthshire.gov.uk/renewable-energy-energy-efficiency-supplementary-planning-guidance Green Infrastructure April 2015: http://www.monmouthshire.gov.uk/app/uploads/2015/07/GI-April-2015.pdf Monmouthshire Parking Standards (January 2013) http://www.monmouthshire.gov.uk/app/uploads/2015/07/Mon-CC-Parking-Standards-SPG-Jan-2013.pdf <u>National Planning Policies (If Any)</u> Future Wales The National Plan 2040 Planning Policy Wales 11

	Technical advice note (TAN) 5: nature conservation and planning Technical advice note (TAN) 6: planning for sustainable rural communities Technical advice note (TAN) 10: tree preservation orders Technical advice note (TAN) 11: noise Technical advice note (TAN) 12: design Technical advice note (TAN) 13: tourism Technical advice note (TAN) 15: development and flood risk (2004) Technical advice note (TAN) 18: transport Technical advice note (TAN) 23: economic development
6	RELEVANT PLANNING HISTORY (if any)

Reference Number	Description	Decision	Decision Date
DM/2022/00951	Loose stone compressed down firmly into existing haul road and a bund on each side of the haul road made using existing site earth material.		
00222	Mastic Asphlate Production APP_TYP 01 = Full DEV_TYP 01 = New Development MAP_REF = 347670189510	Refused	25.04.19
DC/2016/00784	Land reclamation scheme at Caerwent Quarry, Caerwent, including the import of (23,000m3) inert materials to create soil forming base to quarry for future after use as Agriculture.		20.03.20

7	Our initial views about the proposal: <u>Principle of the proposed development</u> Key Constraints; • The application site is outside of the defined settlement boundaries as identified by the Monmouthshire Local Development Plan (LDP) therefore for the purposes of planning is located within the open countryside.

- The site is within a mineral (limestone) safeguarding area.
- Pockets of the site are subject to surface water flooding as shown on the flood maps for planning.
- A public right of way runs adjacent to the site boundary.
- A number of trees within the site mainly concentrated near the entrance are covered by Tree Protection Orders.
- The site is within close proximity to a Site of Special Scientific Interest; Brockwells Meadow.
- The quarry site is designated as a Site of importance for nature conservation designated for; Neutral Grassland, Calc Grass, Post-Ind Land, Vascular Plant & Invertebrates, Amphibians.

The application site is located outside of the settlement boundaries as identified by the Monmouthshire Local Development Plan therefore for the purposes of planning is located within the open countryside where development is strictly controlled and Local and National Planning Policy/Guidance relating to the countryside are applicable.

In respect of National Planning Policy, both PPW11 and FW place a significant emphasis upon sustainable development and seek to direct new development towards the settlement boundaries where it can be best served by existing facilities/infrastructure. In this instance given the nature of the use it is considered unlikely that a suitable site within the designated boundaries would exist therefore it is considered acceptable to consider sites within the open countryside or sites adjoining the boundaries. In this instance it is considered that the proposed development has suitable links to the settlements of Caerwent and Caldicot that would provide easy access by both private vehicle and via sustainable modes of transport. Whilst it would be for the applicant to demonstrate the sustainable credentials of the application site, it is considered that it would be possible to satisfy the sustainable criteria outlined within national policy.

Additionally, tourism is noted as being a key industry of the rural economy as cited within Future Wales, PPW11 and TAN13, therefore adding support to the principle of development to provide holiday accommodation outside the settlement boundaries. Future Wales states "Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy", whilst PPW states (5.5.3) "In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy".

Recently updated guidance has been published; Addressing the nature emergency through the planning system: update to Chapter 6 of Planning Policy Wales. This is relevant to the proposed development as it sets out a number of increased measures for biodiversity enhancement and protection including the stepwise approach. Any application for planning consent must clearly demonstrate compliance with the criteria set out within this recently updated document.

In respect of Local Planning Policy, S11 and T2 are the most pertinent for this application. S11 (Visitor Economy) is the strategic policy relating to tourism and states "Development proposals that provide and /or enhance sustainable forms of tourism will be permitted subject to detailed planning considerations". On the basis that the proposed

development clearly demonstrates not adverse impact and provides a benefit in respect of the local economy it will be considered favourably. The more detail planning policies do not cover a proposal of this nature/scale and therefore the development would be considered contrary to the detailed planning policies. However, the absence of detailed planning policy is considered to be a gap within the LDP and is not considered sufficient as raise an objection to the proposed development subject to an economic and biodiversity benefit being demonstrated via the application. Any application would therefore need to be advertised and treated as a departure from the LDP.

In part the proposal seeks consent for a shop on site, this is considered to conflict with the Town centres first approach as set out in Policy 6 of Future Wales and is unlikely to be considered favourably. It would be advisable for this element to be removed from any future submission as its presence not only conflict with Policy 6 of FW but also would undermine the sustainability objectives of local and national planning policy and would undermine the argument for an economic benefit for the local area.

<u>Design</u>

Whilst it is for you to demonstrate and justify how your proposal positively responds and reacts to constraints and features within the site's context and in turn outline how the scheme complements and enhances its setting, it is important that the development benefits from a sense of place within the site. The Authority would welcome an innovate, highly sustainable, low carbon design for the site which incorporates and responds to the energy hierarchy of reducing energy demand through passive design, promoting energy efficiency through use of appropriate building fabric and inclusion of renewable or low carbon energy generation technologies as well as incorporating efficient resource use during construction, operation and maintenance.

Additional comments in respect of landscape/landscape impact will be sent separately at a later date, once received. This will set out the requirements for additional survey work however it is recommended that the following are submitted in support of the proposal;
1. LVIA
A full and comprehensive Landscape and Visual Assessment guided by the Third Edition of 'The Guidelines for Landscape and Visual Impact Assessment' with photomontages (embracing the LI Institutes latest guidelines) from key receptor locations including any nearby residential areas that maybe affected, PROW and views towards the site from key receptor locations (to be agreed with LA). The site is in a sensitive location and The LVIA will need to take account of the cumulative and in-combination impact of the various proposed activities in the assessment as well as any changes to land area and impact of infrastructure and lighting on the rural landscape.
2. GI Assessment and Masterplan
To ensure an application has considered, assessed and embedded high quality sustainable and multifunctional GI into the proposal which includes the way in which the site is to be designed and managed with consideration of the existing GI assets. It is important that the application includes a comprehensive:
a. GI Assets and Opportunities Plan.
b.*For outline applications: a GI framework plan will be required (clearly setting out the GI open space, any structural planting that will sit outside private ownership and the key design principles for the scheme).
c.GI Masterplan which includes assets to be retained, the location and extent of the access mitigation, lighting and SUDs opportunities. The Masterplan will be informed by LVIA, Ecological, Tree and Drainage / SUDS assessments
d.GI Management plan to compliment any built / engineering infrastructure plans (to be submitted for full applications but can be conditioned for outline application

	but will need to be tied into the GI framework and masterplan). A draft structure can be made available to help clarify the LA requirements. The GI assets and opportunities plan should also consider the assets within the site and nearby built environment that could contribute and inform a layout, design texture, material palette inclusive of colour and opportunities for habitat enhancements. (See Notes to applicant below for link to GI SPG). Full integration of impacts together with measures to protect and mitigate the site will need to be integrated into the LVIA findings and GI requirements. 3. EIA It is considered that an EIA scoping opinion should be sought due to the impact on the Landscape setting. 4. Landscape The provision of a scaled and comprehensive landscape plan that is informed by the SUDS assessments, ecological surveys, arboricultural assessments, GI Masterplan, Development Layout and GI management plan to include details for:- 1. All external hard landscape surfaces, materials and furniture 2. All new boundary treatments inclusive of new fencing, walling and hedging 3. Any areas of adoption, privately owned and managed and strategic planting and infrastructure 4. Sections, elevations, lighting, tree root zone barriers, parking design and materials, SUDS and green engineering provisions and design. 5. All proposed GI works in association with retained and enhanced GI assets on site such as boundary treatments, rain water gardens, scrapes, GI corridors, new tree and hedge planting 6. Soft landscape planting schedule inclusive of species, location, size and density of planting inclusive of planting techniques, seed mixes and aftercare programme for 5 years to establishment. This is to include mitigation measures to account for loss of any tree cover, mitigation to reduce localised visual impacts, ecological connectivity and localised landscape treatments to reduce impact on any nearby views/use 7. Lighting strategy 8. Trees; Any trees on site will need to be assessed and addressed through appropriate arboricultural surveys. Where trees are affected, such as during construction, appropriate mitigation measures will need to be incorporated and will need to be included in the landscape / ecology management plan. The survey shall include the following information: - A Tree Retention/Removal Plan - Plan of retained trees and their root protection areas (RPAs) shown on the proposed layout. - An Arboricultural Impact Assessment. - An Arboricultural Method Statement where construction activity within the RPA of any retained tree is unavoidable. - The appointment of an Arboricultural Clerk of Works to maintain a watching brief on trees at the site for the duration of the development. Finally, the survey and watching brief must be carried by a person who meets the requirements set out in accordance with the Terms and Definitions contained in Section 3 of the Standard Any application for planning permission must demonstrate compliance with S12, S13, S17 SD1, SD2, LC5, GI1, NE1, EP1, EP3 and DES1. <u>Economic Development Implications</u> A significant amount of weight would be applied to the economic benefits generated from the site. Details such as job creation and average over night spend per night should be

submitted in support of the application to clearly demonstrate that the development would have a benefit to the local economy. Such details will be critical in establishing the principle for building in the countryside.

Highway Safety

The LHA have raised a number of concerns as outlined in the attached response however have not objected to the principle of development at this time. It is considered that the concerns raised can be overcome, however, would need to be clearly demonstrated in any application for planning consent.

Details in respect of active travel links and sustainable modes of transport should be provided at application stage. Suggestions to encourage active travel are; links to the adjacent PROW, on site bikes and signage promoting the nearby walking routes.

Any application should be accompanied by a transport and parking assessment. In accordance with Future Wales, a minimum of 10% of parking provision should be for electric vehicles.

Residential Amenity

The site is within close proximity to a number of residential dwellings. The proposal would need to demonstrate that there would be no adverse impact upon the living conditions of neighbouring occupiers particularly in respect of noise and disturbance.

It is considered that development can be located a sufficient distance from the closest residential dwellings as to avoid an unacceptable impact and that landscaping/planting can be utilised to further reduce noise and intervisibility between the site and the neighbouring properties. Any application for planning permission must demonstrate compliance with LDP policies S13, S17, EP1 and DES1.

Ecology

As demonstrated through the existing survey works the site is ecologically sensitive. Further information is required to inform an application regarding; Breeding Birds, Hazel Dormice and Roosting Bats. Any priority habitats identified within the site should be retained within the final site plan design, and appropriate management adopted to ensure they remain of value for biodiversity. Where the loss of priority habitat cannot be avoided, appropriate on-site mitigation should be provided as part of any final designs and ongoing management. There are opportunities to enhance the site via the eradication of invasive species and habitat creation across the site. However, in order to adequately retain the existing valuable habitats on site and enhance the overall site for biodiversity, a reduction in density of units may be required to achieve this.

The Council's Ecologist has been consulted on this application, their response is attached which further outlines the requirements for any future application in respect of biodiversity. It is considered that there are opportunities to provide a net benefit in respect of biodiversity on site if well designed.

Foul Drainage

When drawing up sewerage proposals for any development, the first presumption must always be to provide a system of foul drainage discharging into a public sewer. This should be done in consultation with the Sewerage Undertaker of the area.

If, by taking into account the cost and/or practicability, it can be shown to the satisfaction of the planning authority a connection to a public sewer is not feasible, a package sewage treatment plant should be considered. The plant should offer full treatment with the final effluent discharge from it meeting the standard and conditions set by Natural Resources Wales.

Full details can be found in Welsh Government Circular 008/2018 "Planning requirement in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" which provides advice on the exercise of planning controls on non-mains sewerage and associated sewage disposal aspects of new development in order to avoid public health, amenity or environmental, problems. These can arise from the inappropriate use of non-mains sewerage systems, particularly those incorporating septic tanks and cesspools. Please find link below to the Circular:

https://gov.wales/sites/default/files/publications/2019-05/planning-requirements-for-private-sewerage-in-new-development-wgc-0082018.pdf

Surface Water Drainage

Surface Water; All new developments where the area covered by construction work equals or exceeds 100m² are required to provide an on-site Sustainable Drainage Systems (SuDS) to manage on-site surface water. The approval of SuDS for a new development by the SAB is independent of the planning process and must be granted prior to the commencement of development. It is strongly recommended you instigate a SuDS pre-app with the SAB team prior to the submission of a planning application, as the requirements are highly likely to affect the layout and scale of provision on site. Further information is available via: https://www.monmouthshire.gov.uk/sab/ Any application for planning permission must demonstrate compliance with LDP policies S12, S13, SD3, SD4, EP1, EP2

Planning Obligation

Should the application progress it is anticipated that contributions would be requested for the following areas - please note these figures are indicative and will be dependent upon scheme details: S106 / GI Bond provisions

1.A sum to be agreed prior to approval. This will contribute to improvements to the landscape, biodiversity mitigation and enhancements on GI assets which may be impacted upon as a result of the proposals. As a guide requirements from non-residential developments will be assessed on a case-by-case basis and are normally limited to landscape and biodiversity aspects but may on larger developments include more significant elements of public realm (or improvements to public realm). A calculation of £44.55m2 for off-site contributions to compensate for loss of habitat and GI after onsite mitigation has been accounted for. Developers must show how green spaces will meet the requirements of the GI Design Checklist found in the GI SPG. * Calculations are based upon MCC's Open Space and Recreations methodology in combination with assessment of approved applications and include land purchase, capital cost, adoption cost and admin / management plan.
2.A sum to be agreed. This will contribute to improvements to the local PROW network, including GI improvements associated with improved PROW. Areas identified include the adjacent PROW and links to the nearby settlements and improved connectivity signage.

8	Things we recommend you do, including information you need to submit with your application: Planning Application Forms • Application Fee (Please see http://www.monmouthshire.gov.uk/app/uploads/2013/06/Fees-Guide-NewVersion-Amended-oct-15NEW.pdf) • Site location plan at a scale of 1:1250 with the application site outlined in red and any adjoining land in the same ownership in blue • Existing and proposed site layout plan at a scale of 1:200 or 1:500 • Proposed elevations, roof plans and floor plans at a scale of 1:50 or 1:100 • Site levels and sections • EcIA and supporting ecological surveys • Design and Access Statement • PAC (Pre Application Consultation Document NB:Major Applications Only) • LVIA (Landscape and Visual Impact Assessment) • FCA (Flood Consequences Assessment) • Full foul and surface drainage details • Viability Report • Tree Survey • Transport Assessment • Sustainability Appraisal • Landscaping Plan • Green Infrastructure Plans (Please see http://www.monmouthshire.gov.uk/app/uploads/2015/07/GI-April-2015.pdf) • Planning Statement • Lighting Assessment **NB: Please note that whilst all drawings should be to scale, all proposed plans should include external dimensions annotated on them.**

Case officer: [redacted]	Date: 7th November 2023

The views *given are current at the time of giving the advice*, but planning circumstances can change and will need to be taken into account when any subsequent application is determined.

Planning Performance Agreements (PPAs)

For larger applications we offer the opportunity to manage timescales through a Planning Performance Agreement (PPA). For an agreed fee, the application will be project managed and overseen by one of the Development Management Team Managers, helping to map out suitable timescales, actions and resources to aid determination. This service is specifically tailored to your application, for further information on PPA's please contact Planning@Monmouthshire.gov.uk

Fast Track Services

We now offer a Fast Track service for all applications. The Fast Track service will accelerate the administration and processing of your application for a small additional charge.
Please take a look at the services we offer here : -

https://www.monmouthshire.gov.uk/planning/quick-decision/?preview=true

NB: Sustainable Drainage Approving Body (SAB)

All detailed applications for residential development or where the construction area is *100m2 or more*, will require Sustainable Drainage Systems for surface water (SuDS), to be designed and built in accordance with the statutory standards. Local Authorities will be required to discharge their functions as a SuDS Approving Body (SAB) and approve SuDS schemes prior to the commencement of construction works. SABs will be required to adopt compliant SuDS that are built and function in accordance with the approved proposals, including any SAB conditions of approval. Further guidance is available on the Council's website:

https://www.monmouthshire.gov.uk/sab/

If you project is likely to meet these thresholds you are advised to contact the Council's SAB Team via SAB@monmouthshire.gov.uk

Affordable Housing

The sixth bullet point of Strategic Policy S4 relates to financial contributions to the provision of affordable housing in the local authority area for proposals below this threshold. Full details of the requirements of the Policy are outlined in the Affordable Housing Supplementary Planning Guidance document that was adopted in March 2016. Applications for residential development will need to be considered with reference to this SPG.

Network Rail

Should your development be likely to increase the level of pedestrian and/or vehicular usage at a level crossing any future planning application should be supported by a full Transport Assessment assessing such impact. Any

required qualitative improvements to the level crossing as a direct result of the development proposed should be included within the Heads of Terms. Should you wish to discuss the impact of your proposal on the railway network you are advised to contact Network RailWesternLevelCrossings@networkrail.co.uk

Section 50 Agreement

MCC's Highway Department will not enter in to a Section 50 Agreement with anyone who needs to lay off site connections to a Public Utility (PU) apparatus which on completion will be adopted by the respective PU. Works which fall into this category must be noticed to MCC via the PU's EToN 6 noticing system.

If further clarification is required, please do not hesitate to contact the Council's Highways Team highways@monmouthshire.gov.uk

monmouthshire
sir fynwy

PLANNING DEPARTMENT
PRE-APPLICATION ADVICE SERVICE

CUSTOMER FEEDBACK FORM

To enable us to monitor, review and where necessary change the pre-application service, we would appreciate you taking the time to complete this feedback form.

Reference/Enquiry Number:

***Note**: If completing in electronic format, please double-click boxes to check/uncheck.*

	Yes	No	Comments (including any suggested improvements)
What is important ('what matters') to you as part of your pre-application discussions with us?			
Is the information available on the service useful? (website, guidance notes etc)	☐	☐	
Are you satisfied with the way your enquiry for pre-application advice was dealt with?	☐	☐	
Are you satisfied with the	☐	☐	

timescales it took to meet with you and provide you with a written response?			
Is our response to your development scheme enquiry easy to understand and of benefit?	☐	☐	
Do you intend to submit a planning application following the advice provided?	☐	☐	
Would you use the service again or recommend to others?	☐	☐	
Are there any other improvements you would like to suggest?	☐	☐	

Thank you!

Please return to:
Monmouthshire County Council
Planning Department
County Hall
The Rhaydr
Usk
NP15 1GA
Or email: planning@monmouthshire.gov.uk

Appendix 3

Sustainability Appraisal

Assessment relating Integrated Sustainability Appraisal

The table below includes an assessment of the proposal against the themes contained within the Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP).

ISA Theme	Assessment of Proposed Allocation
Economy and employment	The proposed allocation will provide the applicant with an opportunity to grow a local business in turn contributing to the local economy and enhancing the tourism accommodation provision in the area whilst also resulting in job creation. The proposal would undoubtedly provide a strong form of economic development that would assist in the continued development of the tourist economy in Monmouthshire. The proposal is considered to be both innovative and would result in the diversification of business base within Monmouthshire providing a leisure complex that would draw in custom from wide afield.
Population and communities	This ISA theme is not considered to be applicable given that the proposed allocation relates to tourism development.
Health and wellbeing	The site's allocation for tourism development will promote outdoor use through the provision of enhanced green and blue infrastructure and onsite play provision resulting in significantly positive effects on health and wellbeing.
Equalities, diversity and social inclusion	It is anticipated that the proposed tourism use will be accessible to a range of persons with varying needs in accordance with the ISA theme.
Transport and movement	Whilst it is acknowledged that the proposed allocation would result in an increase in trip generation from the site, it is considered that the level of new trips would result in a negligible impact on the local highway network. The Transport Note which accompanied the pre-application enquiry stated that the development was likely to generate up to 32 two-way vehicle movements during the weekday AM peak hour and 74 two-way vehicle movements during the weekday PM peak hour. The Highways Authority provided a response to the pre-application enquiry (Ref: DM/2023/00747) and did not object to the principle of the proposed development. It is therefore considered that the transport and movement characteristics of the allocation are acceptable.
Natural resources (air, land, minerals and water)	The site is designated as a Mineral Safeguarding – Limestones area within the adopted Local Development Plan. Notwithstanding, it should be emphasised that the quarry use has now ceased and the site therefore represents brownfield land serving little purpose. The site represents a small portion of the Mineral Safeguarding area and its allocation for tourism development would therefore not prohibit future mineral working operations if required.

	Investigations are currently ongoing in relation to land contamination and surface water. Furthermore, it is not anticipated that the proposed development would result in an adverse impact in respect of air quality.
Biodiversity and geodiversity	Given the brownfield nature of the site, it is considered that there are significant opportunities for biodiversity enhancement through the provision of significant landscape planting and species targeted measures including bat and bird boxes.
Historic environment	The site is not located within the setting of any listed buildings or scheduled ancient monuments. Nor is it within a conservation area. As such, the proposed allocation would not result in an adverse impact on the historic environment.
Landscape	The nature of the development proposed as part of the pre-application enquiry was green in appearance with this being a key and distinctive feature for the business. The proposal would make use of and develop upon the existing contours and the trees and hedgerows that forms the site and its boundaries. Any planning application would be accompanied by a Landscape and Visual Impact Assessment to demonstrate the scheme's impact on the landscape.
Climate change (including flood risk)	The proposed allocation would make use of an otherwise redundant and previously developed site. Paragraph 3.55 of PPW establishes that such sites should be used in preference to greenfield sites. A review of Natural Resources Wales's Development Advice Map and Flood Map for Planning identify that the site is not subject to flood risk from rivers. There are isolated areas of the site that are susceptible to surface water flooding. Whilst investigations into the surface water strategy are currently ongoing, it is considered that the flood risk can be dealt with through sustainable drainage measures.

3780

South Wales Land Developments Ltd

Office Use Only
Representor Number
.....
.....
.....
.....

Monmouthshire Deposit Plan Representation Form

Monmouthshire County Council (MCC) is consulting on the Deposit Stage of the Replacement Local Development Plan (RLDP), together with a range of documents and evidence which supports it. You can find the Deposit RLDP and associated documents on the MCC website: www.monmouthshire.gov.uk/rldp-consultation-2024/

The Deposit Plan and supporting documents are available for public consultation for **6 weeks from 4th November 2024 to 16th December 2024**.

To assist with the efficient processing of responses we would encourage you to submit your comments via an online form which is available on the Council's website using the above link. Alternatively, comments can be submitted via email to: planningpolicy@monmouthshire.gov.uk.

If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 16th December 2024**.

Please note that with the exception of Part 1 the form will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW). Guidance notes are set out at the end of the representation form to provide additional details on the RLDP process.

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

	Your/ Your Client's Details	Agent's Details
Title:	[redacted]	[redacted]
Name:	[redacted]	[redacted]
Job Title: (where relevant)		[redacted]
Organisation: (where relevant)	South Wales Land Developments Ltd	RPS
Address:	[redacted]	[redacted]
Telephone No:		[redacted]

Email:	[redacted]	[redacted]

Office Use Only
Representor Number
.....
.....
.....
.....

Part 2: Your Representation

1. Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

2. Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

3.	Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

4. Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

5. Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

6. Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

7.	Do you have any comments on the green infrastructure, landscape and nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

8. Do you have any comments on the infrastructure polices? (Policies S6, & IN1)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

9. Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

Is your representation in support or objection?	Support:	
	Objection:	☑

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

We note and welcome the specific support for specialist housing within or adjacent to defined settlement boundaries. As Paragraph 12.9.1 recognises, specialist housing can come in a range of formats, some of which will provide a higher level of care onsite and cater for residents with a higher level of dependency. For higher dependency facilities there is a likelihood that residents will be less reliant on the use of public transport or access to shops etc. Whilst beneficial for such facilities to be located within or adjacent to settlements (i.e. to provide access to GP surgeries), it is important to recognise that different locational requirements will apply.

Greater flexibility should therefore be applied when assessing higher dependency facilities against Policy H7 (a). This should be clarified in Policy H7 or the supporting text.

10.	Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)	
	Support:	

Is your representation in support or objection?	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

11. Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

Is your representation in support or objection?	Support:	
	Objection:	☑

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Our submission is in support for the principle (with suggested amendments) of Policy EA1c in respect of the continuation of the allocation of 4.5 hectares of land as an industrial and business site for B1, B2 and B8 uses.

In conjunction with the above, we also support Policy E1 and the criteria therein against which the loss of employment land for other uses is to be assessed.

Notwithstanding our support, with the policy and the individual criteria in principle, there are the following clarifications/broadening of the policy that we suggest will make the policies, the allocation and by consequence the Plan overall sound.

In respect of E1, neither the policy nor its supporting justification clarifies whether all criteria need to be met to satisfy it. We assume that it is all, based on the inclusion of the following statement at the end of the policy: *Exceptionally, planning permission may be granted for a change of use of existing employment land when the above criteria are not fully complied with if:*

The draft policy lists two 'exceptions' as below:

i) The proposal is for small scale retail uses which are ancillary to the main business / industrial activity; or

ii) Small scale service activities of an industrial nature which are not suited to the high street and involve the sale, service or repair of vehicles or machinery.

We suggest that the exceptions list is too narrowly defined and should be broadened to enable other uses which are appropriate in planning terms in a site-specific context and which could be significant employment generators, for example specialist housing that includes an element of care. This is on the basis that via the inclusion of following statement, there is an acknowledgement that: *The Council does, however, acknowledge that there may be instances where sites allocated or designated for employment use are no longer appropriate. In such cases the Council may be willing to review the employment allocation / designation and consider whether an alternative and more beneficial use of the site or premises would be appropriate. Consideration will also be given to whether the amenity of an area could be improved by the relocation of inappropriate industries and their replacement by a more suitable use.*

See our comments over in respect of EA1c for further detail on broadening the criteria in respect of that particular allocation.

12. Do you have any comments on the employment site allocations? (Policies EA1 & EA2)		
Is your representation in support or objection?	Support:	☑
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

Our submission is in support for the principle of Policy EA1c in respect of the continuation of the allocation of 4.5 hectares of land as an industrial and business site for B1, B2 and B8 uses.

Our caveat is that the allocation EA1(c) is a location that in overall planning terms and in terms of site-specific context, is a location where a care home, as an example (and for which a pre-application submission is currently with the Council) could be developed in response to market demand, that would deliver significant employment (70+ long term jobs), add to the attractiveness of the location and be designed to sit comfortably within this wider mixed use allocation of residential, business and community uses. A care home development would sit comfortably within this mix creating a sense of place/community, reinforcing the benefits of the co-location of homes, jobs and services, leading to increased vitality and viability of this part of Monmouth.

Linked to the above, we are aware of proposals coming through this replacement Plan by Richborough Estates for the expansion of land to the north of Wonastow Road that would provide for residential and community uses as well as delivering on the 4.5ha allocation of employment. We support the principle of that additional housing and community use in addition to the employment, as a logical extension to recent and proposed development at Wonastow Road which will further reinforce the mixed use benefits that can be realised for this part of Monmouth set out above.

13. Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

14. Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

15. Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).		

If you are objecting, please state how you would like the Plan to be changed.

16.	Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 &CI4)	
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

17. Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)		
Is your representation in support or objection?	Support:	
	Objection:	

Please clearly state which policy/paragraph/allocation/designation of the Deposit RLDP your representation relates to and include any comments in this box (please use additional sheets as necessary).

If you are objecting, please state how you would like the Plan to be changed.

18. Do you have any other comments to make on the Deposit RLDP and/or supporting documents?		
Is your representation in support or objection?	Support:	
	Objection:	
Please clearly state which policy/paragraph/allocation/designation or supporting document(s) your representation relates to and include any comments in this box (please use additional sheets as necessary). If you are objecting, please state how you would like the Plan to be changed.		

Part 3: Tests of Soundness (Please refer to the notes at the end of the form for further guidance)

Do you consider that the Plan is sound?	Yes:	
	No:	☑☑
If you do not consider the Plan to be sound, which soundness test(s) do you think it fails?		

Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales? ☐	Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)? ☐
Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)? ☑	Fails Test 3: Will the Plan deliver (is it likely to be effective)? ☑

Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form):

The Plan is unsound on the basis that there are several issues as highlighted herein in respect of allocations and policies relating to land at Monmouth. If the allocation and policy amendments as suggested herein are accepted, then the delivery of community and employment benefits for the Wonastow Road area of Monmouth will be realised accordingly and the Plan will be sound in the round.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations).

However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?	Yes:	☑
	No:	
If you wish to speak at a hearing session which language would you wish to use?	Welsh:	
	English:	☑

Part 5: Welsh Language

We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



monmouthshire
sir fynwy

Guidance Notes

Please note that only representations submitted during this consultation period (**4th November 2024 to 16th December 2024)** will be carried forward through the Replacement Development Plan process. Any representations that were made in the previous consultations (for example, the Preferred Strategy stage) will not be carried forward. If you consider that any representations you made last time are still relevant, you must submit these again, using the Deposit Plan Representation Form. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please attach additional sheets where required, clearly numbering each consecutive sheet and indicate on the form each individual additional document submitted. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub/library or you can photocopy this form.

Your representation should be set out in full. This will help the Council and the Inspector to understand the issues you raise. Please keep your comments as concise as possible. However, please note that you will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Petitions - Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified. Signing a petition does not prevent the submission of individual forms.

Tests of Soundness - Please indicate which soundness test(s) the LDP meets or does not meet, and why. If you think changes are required to the Plan to make it sound, please explain what these changes are. This will help the Council and the Inspector to understand the issues you raise. However, your comments can still be considered if you do not identify a test, providing your comments relate to the Plan and/or its supporting documents. Details of the Tests of Soundness are set below.

Tests of Soundness
Preparation Requirements: • Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, Community Involvement Scheme (CIS), Strategic Environmental Assessment (SEA) Regulations, Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), etc.?) • Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)

Questions:

- Does it have regard to national policy (PPW) and Future Wales: the National Plan 2040?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the Local Planning Authority (LPA) demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind the plan's policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

New or Amended Sites

Any new or amended sites submitted as part of representations to the Plan must be accompanied by the following:

- A plan of the site you wish to be considered with your representation form, with a clear site boundary shown.
- Details of the proposed use of the site.
- Documentation that the site accords with the RLDP's strategy and that the Plan would be sound if the site is included. Guidance notes on some of the key assessments needed to support new candidate sites is set out on the Council's website at: https://www.monmouthshire.gov.uk/planning-policy/candidate-sites/
- The proposed site should be accompanied by a Sustainability Appraisal which must be consistent with the scope, framework and level of detail as the Sustainability Appraisal conducted by the Council and published alongside the Deposit RLDP.

General Data Protection Regulation (GDPR)

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: http://www.monmouthshire.gov.uk/your-privacy/your-council

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council. Any interested parties must give their consent, in writing, if they wish to be added to the RLDP Consultation Database. Anyone who makes representations on the Deposit RLDP will be deemed to have given their consent and will be added to the stakeholder database.

3899

Mr Paul Smith

View results

Respondent

575 Anonymous

51:29
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

[redacted]

4. Organisation (where relevant)

[redacted]

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

9. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

10. Would you like to comment on this question *

- (●) Yes
- ( ) No

11. Is your representation in support or objection? *

- (●) Support
- ( ) Objection

12. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

Policy S2 and paragraph 6.4.3 - the Abergavenny Settlement Boundary as defined is supported in relation to the River Gavenny corridor

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

13. Would you like to comment on this question *

- ( ) Yes
- (●) No

Do you have any comments on the design and sustainable place-making policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

16. Would you like to comment on this question *

- ◉ Yes
- ○ No

17. Is your representation in support or objection? *

- ( ) Support
- (•) Objection

18. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

    If you are objecting, please state how you would like the Plan to be changed. *

Policy NR1 addresses specifically, amongst other things, locally designated 'Sites of Importance for Nature Conservation' (SINCs). This policy relates to sites within and, possibly, "some distance from the conservation interest" (paragraph 10.10.12 refers).
Policy NR1 firmly places the onus upon a developer to submit ecological assessments on sites within and possible some distance from SINCs. This policy accepts damage to SINCs only under limited circumstances. Therefore, it severely limits the scope to develop sites within and some distance from SINCs.
Despite this, the extent and delineation of the River Gavenny corridor in Abergavenny is absent on the Proposals, Inset and Constraints Plans despite SINCs playing an "..essential role in protecting, maintaining, connecting and restoring biodiversity..." (paragraph 10.10.10 refers).

The absence of SINCs from the Proposals Plans demonstrates a lack of transparency as to the areas of land affected by Policy NR1.

Further, the designation of the SINC designation to the River Gavenny in Abvergavenny is unsupported by any assessments or empirical evidence as to the significance of the River Gavenny, its justification for its designation and the exact delineation of the SINC.
Without this evidence and explicit justification, it is unreasonable of Policy NR1 to place such strict controls upon development upon what are arbitrarily and undefined designated areas of land of undetermined significance in terms of bio-diversity.

In support of these objections, an Ecological Assessment has been carried out on a potential development site on Ross Road, Abergavenny adjoining and above the River Gavenny deemed by the Council to lie within the River Gavenny SINC. A copy of this assessment is available on request. This detailed assessment demonstrates that the site holds no significance in biodiversity terms contrary to its SINC designation..

Remedies to Objections

1. The Proposals, Inset and Constraints Plans should include the extent of all SINCs including the River Gavenny corridor.
2. The designation and delineation of all SINCs should be supported by detailed assessments to justify the application of restrictive Policy NR1 to specific areas of land.

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

19. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

20. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

21. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

22. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

23. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

24. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

25. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

28. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

29. Would you like to comment on this question *

- (•) Yes
- ( ) No

30. Is your representation in support or objection? *

- ( ) Support
- (•) Objection

31. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

Proposals, Inset and Constraints Plans:

The location and delineation of the Sites of Importance for Nature Conservation' (SINCS) are not included. This omission lacks transparency. It is odds to the restrictive nature of Policy NR1 and locally designated sites including SINCs having an "...essential role in protecting, maintaining, connecting and restoring biodiversity..." (paragraph 10.10.10 refers).

Remedy to Objection:
The delineation of SINCs should be defined and recorded by their inclusion in these plans.

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

32. Do you consider that the Plan is sound? *

- ○ Yes
- ◉ No

33. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? *

- ☑ Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- ☐ Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- ☐ Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- ☐ Fails Test 3: Will the Plan deliver (is it likely to be effective)?

34. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): *

The Proposals, Inset and Constraints Plans fail to identify and justify the location and delineation of SINCs and, by implication, undermines the appropriateness of restrictive Policy NR1 to currently undefined tracts of land.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

35. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- (●) Yes
- ( ) No

36. If you wish to speak at a hearing session which language would you wish to use?

- ( ) Welsh
- (●) English

Part 5: Welsh Language

37. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

38. Please also explain how you believe the Deposit Plan could be improved so as to have positive effects or increased effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?



3929

Robert Hitchins Limited

View results

Respondent

245 Anonymous

11:13
Time to complete

Part 1: Contact Details

Please note that by submitting this form you are agreeing to your details being retained on the RLDP Consultation Database and used to inform you of future RLDP correspondence.

1. Title *

[redacted]

2. Name *

[redacted]

3. Job Title (where relevant)

4. Organisation (where relevant)

5. Address *

[redacted]

6. Telephone number *

[redacted]

7. Email *

[redacted]

Part 2: Your Representation

Do you have any comments on the key issues, challenges, vision and/or objectives of the Deposit RLDP?

8. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the Plan's Growth Strategy (the level of growth needed to address the key issues)? (Policy S1)

9. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the Plan's Spatial Strategy (where development is proposed to be sited)? (Policy S2)

10. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the Managing Settlement Form policies? (Policies OC1 and GW1)

11. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the design and sustainable placemaking policies? (Policies S3, PM1, PM2, PM3, HE1, HE2 & HE3)

12. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the climate change and renewable energy policies? (Policies S4, NZ1, CC1, CC2 & CC3)

13. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the green infrastructure, landscape & nature recovery policies? (Policies S5, GI1, GI2, LC1, LC2, LC3, LC4, LC5, NR1, NR2, NR3 & PR0W1)

14. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the infrastructure polices? (Policies S6, & IN1)

15. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the housing policies, including the affordable housing policies and Gypsy and Traveller policies? (Policies S7, S9 H1, H2, H3, H4, H5, H6, H7, H8, H9 & GT1)

16. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the residential site allocations? (Policies S8, HA1 – HA18)

17. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the economic policies? (Policies S10, S11, E1, E2, RE1, RE2, RE3, RE4, RE5 & RE6)

18. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the employment site allocations? (Policies EA1 & EA2)

19. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any comments on the visitor economy policies? (Policies S12, T1 & T2)

20. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the sustainable transport policies? (Policies S13, ST1, ST2, ST3, ST4, ST5 & ST6)

21. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the retail and commercial centres policies? (Policies S14, RC1, RC2, RC3 & RC4)

22. Would you like to comment on this question *

- ( ) Yes
- (•) No

Do you have any comments on the community infrastructure and open space polices? (Policies S15, CI1, CI2, CI3 & CI4)

23. Would you like to comment on this question *

- (•) Yes
- ( ) No

24. Is your representation in support or objection? *

- ( ) Support
- (•) Objection

25. Please clearly state which policy/paragraph/allocation/designation your representation relates to and include any comments in this box

If you are objecting, please state how you would like the Plan to be changed. *

Objection is raised to the identification of Land off Cornpoppy Avenue, Monmouth and Land off Chartist Rise, Monmouth for protection under Policy C13 of the draft Local Plan, for the following reasons:

1. Inaccessible Private Land
Both parcels are privately owned and are not accessible or used by the public. They are enclosed by fences and are not open to community use or enjoyment. As such, seeking to prevent the change of use or development of these sites under this policy would be wholly inappropriate as these are not "Existing Community Facilities."

2. Previous Site Submissions for Residential or Commercial Use
Both sites were submitted for consideration through the Second Call for Candidate Sites with proposed uses being residential or commercial development. It is unclear why these sites, which were initially put forward for housing or employment purposes, are now being protected as existing community facilities allocated for public open space. There appears to be a lack of consultation for the change in their designation.
We acknowledge that the sites were not progressed through the Call for Candidate Sites due to concerns regarding flood risk. However, TAN-15: Development, Flooding, and Coastal Erosion, identifies less vulnerable forms of development—such as general industrial, employment, commercial, and retail uses—as suitable for areas with flood risk.

3. Previous Planning Permissions
Both sites have previously benefitted from planning permission for development, although these permissions have now lapsed. The fact that planning permission was granted in the past indicates that both sites were considered suitable for development at that time, which further calls into question their current suitability for identification under this policy.

Accordingly, the Plan should be amended to remove these sites from Policy C13 and either left as undeveloped parcels within the Settlement Boundary so that proposals can come forward in line with other policies in the Plan or allocated for residential and/or commercial uses as proposed in our Call for Candidate Sites submission.

Do you have any comments on the mineral and waste policies? (Policies S16, S17, M1, M2, M3, W1, W2 & W3)

26. Would you like to comment on this question *

- ○ Yes
- ◉ No

Do you have any other comments to make on the Deposit RLDP and/or supporting documents?

27. Would you like to comment on this question *

- ○ Yes
- ◉ No

Part 3: Tests of Soundness

Please refer to the notes at the for further guidance: https://www.monmouthshire.gov.uk/app/uploads/2024/10/Guidance-Notes-RLDP-ENG.pdf

28. Do you consider that the Plan is sound? *

- ( ) Yes
- (•) No

29. If you do not consider the Plan to be sound, which soundness test(s) do you think it fails? *

- [ ] Fails legal and regulatory procedural requirements or is not in general conformity with Future Wales?
- [x] Fails Test 1: Does the Plan fit (is it clear that the RLDP is consistent with other Plans)?
- [x] Fails Test 2: Is the Plan appropriate (is the Plan appropriate for the area in light of the evidence)?
- [ ] Fails Test 3: Will the Plan deliver (is it likely to be effective)?

30. Please explain why the Plan is not sound or explain what changes need to be made to make the Plan sound (the Tests of Soundness are set out in the guidance notes at the end of the form): *

The Plan should be amended to remove these sites (Land off Cornpoppy Avenue, Monmouth and Land off Chartist Rise, Monmouth) from Policy C13 and either left as undeveloped parcels within the Settlement Boundary so that proposals can come forward in line with other policies in the Plan or allocated for residential and/or commercial uses as proposed.

Part 4: Appearance at Examination Hearing Sessions

The Monmouthshire Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound. At this stage, you can only make comments in writing (these are called written representations). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those that want to provide oral evidence.

Please indicate below if you would like to speak at the public examination.

31. If you have objected to or propose changes to the Plan, would you like to speak at a hearing session during the public examination of the RLDP?

- ( ) Yes
- (•) No

Part 5: Welsh Language

32. We would like to know your views on the effects that the Deposit Plan would have in the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?