

# Monmouthshire Housing Association Land East of A465

Monmouthshire County Council's Replacement Local Development Plan  
(2018-2033) Site Allocation Prospectus, on behalf of Monmouthshire  
Housing Association



Geraint John Planning



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## **EXECUTIVE SUMMARY**

This Allocation Prospectus has been prepared by Geraint John Planning on behalf of the site promoter Monmouthshire Housing Association.

This Planning Prospectus outlines that, on the basis of and informed by a comprehensive review of both the policy and physical context of the candidate site, and considering the feedback provided by the Local Planning Authority and other stakeholders through the LPD Review Process, the site is considered **suitable for allocation as a mixed-use strategic allocation with a capacity of up to 635 residential dwellings and up to 5,000 sqm of retail, hotel, leisure**. On this basis, the site should be viewed favourably for the following reasons:

- The site is being promoted by an experienced housebuilder, Monmouthshire Housing Association, in accordance with the two landowners, who are **committed to bringing the site forward for future development, and have a considerable track record in delivering development across the region**;
- The Well-being of Future Generations Act outlines housing development and regeneration as a key goal. The Welsh Government and the Cardiff Capital Region are committed to a new partnership approach to strategic planning. This will ensure the **delivery of sustainable communities**;
- The site will include **considerable facilities, and enhanced community infrastructure**, including Local Centre, primary school, community facilities, employment hubs, public open space, and other facility provision;
- The **Framework Masterplan for the site is based on the 20-minute neighbourhood concept and includes a mix of complementary uses within easy walking/cycle distances of each other**. This will encourage the internalisation of movement focusing on **Active Travel, placemaking, wellbeing and sustainability**;
- **The site is not subject to any unresolvable technical constraints**, including ecological, archaeological/heritage, flood risk and drainage, or other environmental constraints;
- A **Green Infrastructure Plan has been developed** in order to show how existing habitats and green corridors will be retained and enhanced, and moreover be an **integral and significant part of the Placemaking approach to the site and opportunity**;
- The **site is suitable and available for development in the immediate future**. Moreover, it is **viable and deliverable** – as evidenced and supported by a Viability Assessment undertaken by MHA;
- The allocation of this site **will enable a significant and meaningful supply of housing to be delivered** along with the benefits of **providing additional infrastructure to support both existing and new residents** – all in a way that achieves the **wider objectives of collocating uses, sustainability, and renewable / low carbon energy**.

Having regard to the above key considerations, it is considered that **the site and associated options for allocation are fundamentally sound in principle, and represents an appropriately scaled allocation of development which makes effective use of an accessible and sustainably located site.** This, coupled with the **lack of any technical constraint, and the provision of much needed housing on a deliverable site** provides considerable support and justification for the scheme proposals.

Moreover, and in particular, the proposed development follows a design-led process and embraces PPW11's, Future Wales and DCFW placemaking principles / goals, objectives and concepts.

The proposals seek the **creation of a sustainable and resilient community, that considers the context, function and relationships between the development site and its wider surroundings, whilst drawing upon the area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense.**

## **SITE SURVEYS / REPORTS / SUPPLEMENTARY INFORMATION**

In order to assess the site, and to provide supporting technical information for the site and the proposals, a suite of technical reports have been commissioned as part of the process of site promotion. These are submitted under separate cover, however a description of the purpose, work undertaken, findings, and authors of these are summarised below:

| <b>Report / Plans / Survey</b>        | <b>Description of work</b>                                                                                                                                  | <b>Summary of Findings</b>                                                                                                                                                                                                                                                                                                                                                      | <b>Consultant</b> |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>Masterplan</b>                     | Masterplan indicating the proposed layout of development on the site.                                                                                       | <p>Masterplan has taken into account the specific requirements for:</p> <ul style="list-style-type: none"> <li>- Access</li> <li>- Drainage / SUDs</li> <li>- Green Infrastructure</li> <li>- Ecological Constraints / Buffering</li> <li>- Mix of residential tenures (Market, affordable)</li> <li>- Mixed uses</li> </ul>                                                    | Hammond Ltd       |
| <b>Ecological Appraisal</b>           | An ecological appraisal of the site including the establishment of baseline conditions through a desk-based assessment and Extended Phase 1 Habitat Survey. | <p>The combination of desk study and Extended Phase 1 Habitat Survey identified a range of habitats at the site.</p> <p>The areas of grazed improve grassland and arable field were considered to be of limited ecological importance.</p> <p>Further survey work required in respect of bats, birds dormice, reptiles and Great Crested Newts to take place in the future.</p> | Soltys Brewster   |
| <b>Landscape and Visual Appraisal</b> | A landscape and visual assessment of the site for a proposed mixed-use development regarding landscape character (on-site and off-site) and visual amenity. | The effects of the development on the landscape character are limited and any negative impacts are outweighed by the potential GI benefits the scheme will have.                                                                                                                                                                                                                | MHP Design        |
| <b>Archaeology Assessment</b>         | A desk-based assessment to determine the archaeological and heritage potential of the site.                                                                 | The site is not greatly constrained by heritage or archaeological considerations. The assessment concludes that the proposed development is likely to have a limited effect on historic assets and archaeology with appropriate mitigation measures.                                                                                                                            | Archaeology Wales |

| Report / Plans / Survey                 | Description of work                                                                                                                                                                                 | Summary of Findings                                                                                                                                                                                                                                                           | Consultant                         |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| <b>Air Quality Assessment</b>           | Sets out a baseline assessment of air quality in the area.                                                                                                                                          | The existing air quality at the site is assessed to be 'good' and therefore, acceptable for future residents. The assessment concludes that the proposed development will not have any significant effect on air quality at nearby existing residential and ecological sites. | Air Quality Consultants            |
| <b>Agricultural Land Classification</b> | Sets out the findings of the Agricultural Land Classification of the site.                                                                                                                          | The survey, carried out in July and August 2021, has identified that the site is a mixture of land quality but mostly Subgrade 3b "moderate" quality with some area comprising Grade 2 'very' good quality.                                                                   | Kernon Countryside Consultants Ltd |
| <b>Drainage / Flood Risk</b>            | Review of existing and proposed surface and foul water, and the site's location within the River Usk Phosphate Catchment Area.                                                                      | The site lies within Flood Zone A. The site has existing / potential efficient solutions for surface and foul water flow drainage and will incorporate appropriate SuDS features. The development will be able to achieve Phosphate neutrality.                               | Quad Consult                       |
| <b>Noise Impact Assessment</b>          | A comprehensive review and assessment of noise constraints affecting the site – including adjacent transport networks.                                                                              | No sensitive receptors are located within NEC C or NEC D areas and as such, ambient noise is not considered to be a significant constraint at the site.                                                                                                                       | Hunter Acoustics                   |
| <b>Tree Survey</b>                      | A survey of trees on the site.                                                                                                                                                                      | The site doesn't accommodate major arboricultural constraints, and will be enhanced through GI and further landscaping provisions                                                                                                                                             | Broadway Tree Consultancy          |
| <b>Access Appraisal</b>                 | Review the existing transport conditions within the vicinity of the site, identify options to access the site, and provide recommendations as to the most suitable access strategy to support site. | The constraints identified can be overcome, through improvements to the existing surrounding infrastructure and access points.                                                                                                                                                | Lime Transport                     |
| <b>Ground Conditions</b>                | A desk-based review of the existing ground conditions of the site.                                                                                                                                  | The site is not constrained by any existing contamination issues and the overall risk for the site is considered to be low/medium.                                                                                                                                            | Integral Geotechnique              |
| <b>Utilities Search</b>                 | A review of the existing utility capacity at the site and how the proposal can connect to the surrounding infrastructure.                                                                           | The site benefits from existing utility connections within the vicinity of the local area. Infrastructure improvements are required to improve capacity.                                                                                                                      | M-EC                               |

| Report / Plans / Survey    | Description of work                                                                                                                                                                              | Summary of Findings                                                                                                                                                                                                                                            | Consultant                        |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| <b>Viability Appraisal</b> | MHA have conducted an independent viability appraisal of the site, in conjunction with the Council's preferred Development Viability Model (DVM) produced by consultants Burrows-Hutchinson Ltd. | The assessment confirms the site is whole-heartedly viable as the appraisal has taken into account with, and accords with the DVM Model shared by the LPA to-date. Appropriate evidence corroborating the assumptions made in the appraisal are also provided. | Monmouthshire Housing Association |

## **1.0 INTRODUCTION**

### **1.1 - PURPOSE OF THIS DOCUMENT**

This report is submitted in response to Monmouthshire County Council (MCC) Local Development Plan (LDP) 2018-2033 Preferred Strategy Consultation - Candidate Site Assessment Stage 2.

The aim of this report is to identify the material considerations to be considered in the progression of Land East of A465, Abergavenny (the site) to the adoption stage. The report will provide support for the allocation of the site within the emerging LDP, evidencing the deliverability of the site. This report should be read in conjunction with other material submitted to this consultation process, including the extensive and detailed constraint, opportunity, context/setting and illustrative plans and drawings prepared, as well as the extensive technical reports across multiple disciplines, specifically for this submission.

This document notes how design opportunities arise from analysis and shape the outcome. It also describes how design principles specifically produced for the site / proposals have influenced the design through to completion. It narrates the vision we have for the site and its delivery via the mechanism of the brief in the context of the currently developing LDP.

In essence, this document sets out the 'story' of the site to-date.

### **Background**

Regulation 15 of the Local Development Plan Regulations requires that, before submitting the content of its LDP for Deposit, a Council must publish its Preferred Strategy (Pre-Deposit) for public consultation.

The RLDP Delivery Agreement was first approved by Welsh Government on 14<sup>th</sup> May 2018. However, progress on the preparation of the RLDP has not proceeded as quickly envisaged in the original Delivery Agreement. A Revised Delivery Agreement was then approved by the Welsh Government on 6<sup>th</sup> March 2020. This amended the Plan's timetable to reflect the delays incurred up to the Preferred Strategy (March 2020) stage of the RLDP process. However, and subsequent to this, a number of other factors have resulted in further inevitable delays to the preparation of the RLDP, including the Covid-19 pandemic and publication of the corrected Welsh Government 2018- based population and household projections in August 2020. This has resulted in the need to revisit the Growth and Spatial Options and Preferred Strategy stages of the RLDP process. These delays necessitated a further revision to the RLDP Delivery Agreement. A Revised Delivery Agreement (October 2020) has therefore been prepared which sets out a revised RLDP timetable. The Revised Delivery Agreement was agreed by Welsh Government on 30<sup>th</sup> October 2020.

The following table sets out the detailed timetable for community engagement and the proposed engagement methods for key stages in the RLDP preparation process:

| Key Stage                                                                                  | Timetable                     |
|--------------------------------------------------------------------------------------------|-------------------------------|
| <b>Definitive</b>                                                                          |                               |
| Revised Delivery Agreement (3)                                                             | July 2020 – October 2020      |
| Pre-Deposit Participation                                                                  | September 2018 – January 2021 |
| • Consultation on draft vision/issues/objectives - 8 weeks                                 | February 2019 – June 2019     |
| • Consultation on strategic options -10 weeks                                              | December 2020 – January 2021  |
| Consultation on Preferred Strategy and ISA Initial Report – 8 weeks statutory consultation | July 2021 – August 2021       |
| Further Call for Candidate Sites – 6 weeks                                                 |                               |
| Consultation on Deposit Plan and Final ISA Report – 8 weeks statutory consultation         | July 2022 – September 2022    |
| <b>Key Stage</b>                                                                           | <b>Timetable</b>              |
| <b>Indicative (Subject to further liaison with PINS closer to the time)</b>                |                               |
| Submission                                                                                 | February 2023                 |
| Examination                                                                                | Spring 2023                   |
| Inspectors Report                                                                          | Autumn 2023                   |
| Adoption by Council                                                                        | Late 2023                     |
| Monitoring and production of 1 <sup>st</sup> AMR                                           | Late 2024                     |

### STAGES OF SITE ASSESSMENT

The Candidate Sites Methodology states out that the Council will undertake a comprehensive four stage site assessment process which, will include the stages as set out below. The first / current stage, which this submission has had full regard to, is discussed in more detail below.

- Stage 1
- Stage 2
- Stage 3A
- Stage 3B

#### Stage 1 – Initial Call for Sites

Appendix 1 of Monmouthshire's Candidate Sites Methodology (July 2018) sets out that the initial assessment site appraisal is divided into several sections and is summarised in the following table, below:

|                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site character and context-</b> Whether the site is Brownfield/ green field land, the current use of the site, the proposed use of the site, its current planning status, and its location shown on a plan. |
| <b>Physical Constraints</b> – Whether the site has any known physical constraints, including topography, access, serve slope and vegetation cover.                                                             |

|                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Flood risk</b> - Is the site within a flood zone.                                                                                                                                                |
| <b>European Designated Site</b> - If the site is within a European Designated Site e.g. SAC, RAMSAR.                                                                                                |
| <b>Location and Neighbouring Uses</b> – Whether the site is affected by any known ‘bad neighbour’ uses e.g. power lines, railway lines, major highways, heavy industry.                             |
| <b>Contamination</b> – If the site contains any level of contamination.                                                                                                                             |
| <b>Other Key Constraints</b> – If the site is subject to any other known constraints.                                                                                                               |
| <b>Overall Conclusions of the Initial Candidate Site Assessment</b><br>1) <u>The site remains in the process;</u><br>2) Further information is required; or<br>3) Remove the site from the process. |

### Stage 2

Paragraph 4.1 states how Stage 2 involves a more detailed analysis of sites that have passed through Stage 1. This stage will give an indication as to whether the site accords with the Preferred Strategy, and the overall objectives of the plan. This will be through an Integrated Sustainability Assessment (ISA) framework determining whether the site has positive, neutral, or negative impacts. Those sites that are determined to be contrary to the ISA, and to the objectives of the Plan and its Preferred Strategy, sites will be removed from the assessment process at this stage.

### Stage 3

Paragraph 5.1 highlights how Stage 3 involves a more detailed assessment of candidate sites at an officer level using a ‘traffic light’ coding system to identify which sites are more desirable and which sites are less so. There will be consultation at this stage with internal Council Departments, such as Highways, Education, Regulatory Services, Estates, Drainage.

The ‘traffic light’ coding system is as follows:

|                                                                   | Impact |
|-------------------------------------------------------------------|--------|
| Proposed site is expected to have significant positive impacts    |        |
| Proposed site is expected to have some positive impacts           |        |
| Proposed site is expected to have a neutral impact                |        |
| Proposed site is expected to have some negative impacts           |        |
| Proposed site is expected to have significant negative impacts    |        |
| The impact of the proposed site cannot be predicted at this stage |        |

The criteria to be assessed are:

- Land – Planning Policy Wales emphasises the importance of re-using brownfield sites. Therefore, previously developed land will rank higher than greenfield sites. The proximity to existing settlements will also be a consideration.
- Availability and Deliverability – The Council will need to have a reasonable degree of confidence that the site will be delivered and there are no legal obstacles to delivery; that there are no site utility constraints, physical constraints and the site provides scope for renewable energy solutions and infrastructure deliverability.
- Accessibility - The importance of reducing the need to travel and new developments having access to a range of key services is set out in national policy. The transportation context and the potential for sustainable transport will be assessed.
- Historic and Cultural Landscape - Potential impact on historic landscapes, conservation areas and listed buildings will need to be considered.
- Environmental – Potential impact on Biodiversity/geology, landscape, the historic, cultural and built environment, natural resources and contaminated land will need careful consideration, including impact on the following designations: -
  - Special Area of Conservation (SAC)
  - Site of Specific Scientific Interest (SSSI)
  - Ramsar Site
  - Special Protection Area (SPA)
  - Sites of Important Nature Conservation (SINC)Loss of protected woodland/trees and hedgerows will need to be avoided as much as possible, and schemes which have an impact on air quality will need to demonstrate appropriate mitigation.
- Physical – The existence of physical constraints, such as flood risk and topographical constraints will be a factor, along with agricultural land and mineral safeguarding areas. Careful consideration will be given to existing flood risk and the potential to manage flood risk.
- Economic and Other Benefits – Certain development schemes may bring about additional benefits to a locality, for example, provision of employment opportunities in an area of high unemployment.

### *Stage 3A*

Finally in paragraph 5.5 of Monmouthshire's Candidate Sites Methodology it describes how Stage 3A will involve the assessed sites going out to consultation with external statutory agencies, the infrastructure providers, such as Dwr Cymru/Welsh Water and the National Grid, Natural Resources Wales, Glamorgan Gwent Archaeological Trust, Wales and West Utilities, and Western Power Distribution. These will assess the overall viability, potential issues and mitigating measures necessary and acceptable.

On this basis, the aim of this prospectus is to identify the material considerations to be taken into account in the progression of the site to the allocation stage. This report will provide support for the allocation of the site within the emerging LDP, evidencing the deliverability of the site as a single cohesive development, naturally extending and complementing the expanding settlement of Abergavenny, and its outlying constituent parts, whilst also being self-sufficient.

## 1.2 - CONTENT OF THESE SUBMISSIONS

This technical document records the technical work and assessment findings that underpin and have informed the proposals. It focusses, and is structured accordingly, on the detail that has been requested to be provided as part of the Candidate Sites Methodology exercise and form issued by Monmouthshire County Council.

A considerable suite of assessment material is submitted in conjunction with this submission. These include a range of plans and supporting information and considerable background and underlying work, assessment, and formal output generated for the site and development opportunity as a whole. Accordingly, this submission ought to be read and regarded as a 'headline' summary of this underlying work – on which it draws, has been informed by, and takes into account.

In compiling this submission, regard has been had to the following:

- Development Plans Manual Edition 3 March 2020;
- National Planning Policy (including the recently published Future Wales and Planning Policy Wales Edition 11); and
- The current Monmouthshire County Council LDP (Adopted February 2014).

The key relevant content and provisions of these documents are set out in an Annex to this submission.

As set out above, the submission has been specifically tailored and structured to respond to the specific information set out within the Monmouthshire Replacement Local Development Plan 2018-2033 Second Call for Candidate Sites Form (July 2021). Each sub-section responds to the specific questions posed in that Methodology.

### 1.3 - A BROAD DESCRIPTION OF THE PROPOSAL

The site is located to the east of Abergavenny along the A465 carriageway. The site consists of improve grassland, arable fields, and hedgerow margins, which are bounded by the A465 road to the west (beyond which the settlement of Abergavenny lies), line of hedgerow and a small road abutting the northern boundary, farms / farmland to the east with Ysgyryd Fach further afield, and agricultural land to the south. The site also sits adjacent to Abergavenny Train Station, which is located west of the A465. The site comprises several buildings/structures at Garth Farm and Roc House Farm.

The site measures approximately 24.75 hectares and its current use comprises vacant greenfield land. The site forms part of a natural and logical urban extension to the town of Abergavenny.

In its purest form, the strategic opportunity seeks to deliver:

- Up to 635 new homes
- 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 facilities i.e., new primary school
- A number of public parks, open and play spaces including the creation of a 'woodland hub'
- A new local centre providing up to 0.75ha of mixed-use land focused on a civic space
- Multifunctional Green and Blue Infrastructure
- A Station Link to improve connectivity to the wider region

Essentially, the proposal to unlock the land east of Abergavenny, offers excellent opportunity to create a sustainable, vibrant mixed-use neighbourhood destination, with a distinct sense of place and identity – through the delivery of a cohesive and logical extension.

This submission relates purely on the land being promoted for development by the site promoter, Monmouthshire Housing Association, under the ownership of two landowners. Additional land is referenced to within this submission within the ownership of one of the landowners, which can be utilised for additional access to the site, green infrastructure, landscape and/or ecological mitigation. The extent, function and long-term management of this land will be agreed and refined as the development strategy progresses.

The site promoter is also working co-jointly with the adjacent landowners within the Wider Strategic Site area to bring the overall vision forward, for the sustainable and cohesive extension to Abergavenny.

## 1.4 - CONSULTANT TEAM

The promoting party has assembled a multi-disciplinary consulting team to ensure the proposal is sustainable and deliverable. The team assembled has a proven track record within the County and across Wales of working with landowners and other promotional parties.

A full table is provided overleaf outlining the extensive multi-disciplinary team involved to-date.

| Output                           | Consultant                        |
|----------------------------------|-----------------------------------|
| Promoter                         | Monmouthshire Housing Association |
| Planning Consultant / Agent      | Geraint John Planning             |
| Masterplanner / Architect        | Hammond                           |
| 3D Lidar Survey Data             | CornerPoint                       |
| Landscape and Visual Impacts     | MHP Design                        |
| Ecology                          | Soltys Brewster                   |
| Archaeology                      | Archaeology Wales                 |
| Arboriculture                    | Broadway Tree Consultancy         |
| Agricultural Land Classification | Kernon Associates                 |
| Utilities Search                 | M-EC                              |
| Ground Conditions                | Integral Geotechnique             |
| Highways and Access              | Lime Transport                    |
| Flood Risk & Drainage            | Quad Consult                      |
| Phosphate                        | Quad Consult                      |

| Output      | Consultant              |
|-------------|-------------------------|
| Noise       | Hunter Acoustics        |
| Air Quality | Air Quality Consultants |

All operational constraints are considered from service capacities to flooding and transport, whilst environmental and ecological constraints are all fully identified.

## **2.0 BACKGROUND OF WORK COMPLETED TO-DATE**

### **2.1 - INITIAL CALL FOR CANDIDATE SITES – JULY 2018**

In July 2018, the candidate site consultation window had opened, and the site promoter, Monmouthshire Housing Association (MHA), coordinated the submission of the strategic opportunity. This submission comprised the submission of a red line boundary plan, and the completion of the 'Initial Call for Candidate Sites' form.

The submitted form briefly demonstrated the site's existing and proposed use, the constraints associated with the site pertaining to flood risk, contamination, air quality etc., its utilities' capacity, infrastructure required to ensure a future proposal's sustainability, and indicative information on the site's viability. Therefore, the submission represented an initial and indicative proposal for a mixed-use allocation at this site, outlining that there is capacity to accommodate a level of growth within this area of Abergavenny, through a sustainable and viable extension to the settlement.

### **2.2 - GROWTH AND SPATIAL OPTIONS PAPER – JUNE 2019**

#### ***RLDP Growth and Spatial Options***

Whilst there is no statutory requirement for consultation on the Growth and Spatial Options identified within the County, in accordance with the RLDP Revised Delivery Agreement (May 2018), the Council engaged with consultees at this early stage to help build consensus on the growth levels and spatial strategy of the Replacement LDP and to fully understand the pros and cons of the options. Non-statutory engagement and consultation on the Growth and Spatial Options took place for a four week period between 8<sup>th</sup> July and 5<sup>th</sup> August 2019, whereby comments were invited on the consultation questions set out in the Paper.

MHA (Site Promoter) submitted their Representations in response to the Council's RLDP Growth and Spatial Options Paper, outlining their preference for the identified growth and spatial options and how these preferred options will meet and address the Key Objectives and Issues identified within the County. Their responses to the necessary questions are provided below for context:

#### ***Growth Options***

The Paper presented a range of alternative housing and economic growth options for consideration to inform the Replacement LDP (2018-2033). A total of 20 different scenarios were generated by Edge Analytics comprising of low growth, mid growth and high growth. The Representations submitted considered it appropriate to pursue a high option growth in order to address key issues the Council are facing in relation to economic output and out-commuting. Moreover, it was conveyed that the spatial distribution of this growth must include a focus on the primary settlements, such as Abergavenny, as the most sustainable locations for development, albeit land will need to be identified across the County in order to succeed in accelerating growth.

**The detailed response prepared by MHA submitted in August 2019 (please refer to Appendix 1 for the full report) responded to the Growth and Spatial Options Paper's question relating to the Council's preferred growth option. The key points within their response are as follows:**

- The low growth options identified within the Paper simply do not meet the Draft LDP objectives as they would result in an ageing and declining population – which would be unable to support local employment and retail centres.
- The three mid growth options involve a lower annual housing requirement than the adopted LDP's planned housing provision (495 dpa) – which is not a sustainable option given the demographic and economic challenges the County are facing.
  - In particular, there needs to be a level of growth in both housing and employment that rebalances the overall demographic of the population, increasing the proportion of working age people.
- There is significant rationale for pursuing an accelerated growth agenda for Monmouthshire rather than the planning in line with past trends. This includes:
  - Increasing the currently relatively small working age population base;
  - Increasing economic output;
  - Reducing out-commuting to larger economic centres such as Cardiff, Newport and Bristol;
  - Play a central role in the region's economic growth as part of the Cardiff Capital Region City Deal; and
  - Increase the viability of Monmouthshire's town centres through growth in the population catchments.

Overall, the Representations outlined that the delivery of new homes will be an important factor in driving in Monmouthshire's economy and it is clear from evidence presented that the benefits of pursuing a high growth option would be significant. Therefore, the Representations confirm the support for Growth Option 7 – which would result in a housing requirement of 631 dwellings per annum that equates to approximately 27% higher than the adopted LDP's housing requirement so is considered both positive and realistic.

### *Spatial Options*

In addition to setting out options for the level of growth needed over the plan period, the RLDP must also put forward a clear spatial strategy for where this development should take place within the County – whereby a range of spatial options are presented for accommodating housing and employment growth. A total of 5 broad Spatial Distribution Options were considered and these are as follows:

- **Option 1: Continuation of the existing LDP Strategy** - Distribute development around the County with a particular focus on Main Towns<sup>9</sup>, some development in Severnside<sup>10</sup> and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development to be accompanied by new employment opportunities, where possible.
- **Option 2: Dispersed growth and New Settlement** – Distribute growth across Primary Settlements, Secondary Settlements, Severnside and those Rural Settlements identified as having capacity for growth and/or in need of development to sustain them, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. Inclusion of a New Settlement within the County to deliver longer term growth providing housing, employment, retail and associated infrastructure. It is recognised a New Settlement will take a long time to progress and cross over into next plan period, hence additional dispersed growth is required to account for the identified need.
- **Option 3: Distribute growth proportionately across rural and urban areas** – Distribute growth proportionately across Primary Settlements, Secondary Settlements, Severnside and those Rural Settlements identified as having capacity for growth and/or in need of development to sustain them, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing.

- **Option 4: New Settlement with limited growth in Primary Settlements, Secondary Settlements and Severnside only** - Growth to be predominantly accommodated in a New Settlement. Limited growth in Primary Settlements, Secondary Settlements and Severnside to meet some of the identified need prior to progression of a New Settlement.
- **Option 5: Focus on M4 corridor** - Growth to be predominantly located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure connections.

Each aforementioned option was considered within the Representations submitted, and it was outlined that either option 1 or 3 were the preferred spatial option.

**The detailed response prepared by MHA submitted in August 2019 (please refer to Appendix 1 for the full report) responded to the Growth and Spatial Options Paper's question relating to the Council's preferred spatial option. The key points within their response are as follows:**

- Focus purely on M4/M48 corridor (option 5) would not be sustainable – new development in this area is likely to result in increase in out-commuting and unsustainable travel patterns out of Monmouthshire to the economic centres of Bristol, Newport and Cardiff whilst also resulting in the failure to meet the housing and employment needs across the whole of the area.
- New settlement (option 4) – would significantly prejudice the delivery of housing during the first 5-10 years of the plan period, given the length of time it takes to progress a new settlement. It is an inherently unacceptable approach and would result in the LDP being found unsound.
- Preferred Option (1 and 3) – both options involve applying growth appropriately to the settlement hierarchy, albeit Option 3 involves 'dispersing growth proportionately.'
  - The allocation of viable and deliverable sites and a positive approach to development are the key themes that need to come through in the Replacement LDP – Options 1 and 3 can be the platform for this, but the identification of additional sites for housing and employment across the County is the most fundamental need.

Overall, the Representations outlined that both Options 1 and 3 involve appropriately distributing growth across the County, which will assist in providing employment opportunities and access to market and affordable homes for a wider population. Growth is accommodated at the most sustainable settlements, while development in more rural settlements can have positive impacts on their long term sustainability. Brownfield land is a limited resource in Monmouthshire and focusing growth in the main towns and villages on greenfield land where necessary is required in order to deliver the Draft LDP vision and objectives.

## 2.3 - GROWTH AND SPATIAL OPTIONS PAPER – DECEMBER 2020

### *RLDP Growth and Spatial Options*

As set out above for the previous round of consultation on the Council's RLDP Growth and Spatial Options Paper, whilst there is no statutory requirement for consultation on the Growth and Spatial Options, in accordance with the RLDP Revised Delivery Agreement (October 2020) and as with the original 'Growth and Spatial Options', MCC deemed it appropriate to continue engagement with stakeholders/communities to help build a consensus on the growth levels and spatial strategy of the RLDP, and to fully understand the implications of the options. The Council decided to revisit the Growth and Spatial Options stage of the RLDP process following the publication of the corrected Welsh Government 2018-based population and household projections in August 2020.

On 4<sup>th</sup> January, MCC opened a four week non-statutory engagement and consultation on the Growth and Spatial Options, inviting comments which would inform the preferred growth and spatial strategy options to be set out in the Preferred Strategy.

#### *Growth Options*

The Growth and Spatial Options Report presented a range of alternative demographic, dwelling and employment-led growth options for consideration to inform the RLDP (2018-2033), whereby a range of scenarios / trend-based assumptions were considered to inform the level of housing and employment provision within the plan period. A total of fourteen different scenarios were generated by Edge Analytics (commissioned by the Council).

Following extensive review of the fourteen scenarios, six were selected for further consideration as an alternative growth options for consultation purposes. These included four demographic, one dwelling-led and one employment-led option.

The paper set out that the Growth Options presented alternative growth strategy options to inform the level of dwelling and employment provision within the RLDP, having regard to national policy, the evidence base and policy aspirations. Based on the assessment undertaken, Growth Option 5 'Population-led projection' was confirmed to be the Council's preferred Growth Option – reasons for which, are reproduced below and referred to in paragraphs 2.96, 2.97 and 2.98 of the Paper:

- "2.96 *Growth Option 5 would provide the level of growth that will help to deliver the Council's **core purpose of building sustainable and resilient communities for current and future generations**. Fundamentally, this option will enable the provision of a sufficient range and choice of homes, both market and affordable, the need for which has been heightened by the current pandemic. This option will also assist in ensuring **our communities are balanced and socially sustainable**, particularly in terms of demography, which is a key RLDP objective and the importance of which has been clearly demonstrated during the current pandemic.*
- 2.97 *Likewise, the level of employment growth will assist in **reducing the need to travel / levels of out-commuting**, and **promoting self-contained communities**. Whilst this option projects a significant growth in jobs, with an increase of 7,215 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. While it*

*will not be possible for all employment sectors to work from home /work remotely, **policy support requiring broadband connectivity and supporting the provision of local employment hubs will enable those who can and choose to do so.** The Covid-19 pandemic has affected home-buying trends with an emphasis on quality of life, house size and access to outdoor green space rather than a focus on commuting times. Monmouthshire is a very attractive proposition and stands to gain from an increased economically active population without the associated problems of increased commuting, and local businesses and services would benefit from increased custom and footfall with workers spending their wages in local businesses rather than in the town/city in which they previously worked.*

- 2.98 *Appropriately located growth will **increase the customer base and workforce, supporting local facilities, businesses and services.** The **increased reliance on access to local facilities and services during the current pandemic,** has highlighted their importance to our communities. This option would best **meet the needs of and support the communities of Monmouthshire by providing a level of growth which will provide opportunities to secure affordable housing, improvements to infrastructure and potential to maximise opportunities to secure and/or enhance green infrastructure, public open space and recreation provision.***

With regard to the ISA analysis, MCC outlined that Growth Option 5 performs better overall against the ISA themes than any of the other five options – in particular, Growth Option 5 along with Growth Option 6 are predicted to perform well against ISA themes relating to population/communities and economy/employment. Both options are considered likely to support the retention of younger age groups and reduce out-commuting, whilst providing opportunities to encourage a more diverse and vibrant economy.

Overall, Growth Option 5, Population-led projection, is considered to best meet the RLDP objectives without adverse impacts on the climate emergency objective and is considered to be the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

**The detailed response prepared by us as Agent submitted in February 2021 (please refer to Appendix 2 for the full report) responded to the Growth and Spatial Options Paper's question relating to the Council's preferred growth option. The key points within our response are as follows:**

- The Council's preferred Growth Option 5 does not sufficiently account for Monmouthshire's past economic growth rate in line with the County's ambition to grow economically.
- Growth Option 5 also does not allow for sufficient growth in population categories 20-24 and 25-29 which, if allowed for, would result in increased sustainability of local centres and facilities.
- Agree that lower-growth options (Options 1-4) do not meet the draft LDP objectives as they would assume and result in an aging and declining population in the County – such options would not be able to support local employment and retail centres.
- Whilst Growth Option 5 would meet some of the RLDP Objectives, it would not sufficiently maximise opportunities to meet two of the Key Objectives a) Demography and b) Housing), that are considered to have further increased emphasis in light of COVID-19.
- Growth Option 6 (Employment) is our preferred option, which will act to:
  - Increase the current relatively small working-age population base;
  - Increase economic output within the County;

- Reduce out-commuting to larger centres (i.e. Cardiff, Newport, Bristol) by creating and retaining jobs within the County;
- Make full use of the removal of the Severn Bridge Toll to attract in-migration to the County;
- Assist with the region's economic growth as part of the Cardiff Capital Region; and
- Increase the viability and vitality of Monmouthshire's town centres through a growth in population catchment areas.

Further explanation / evidence are referred to within our submitted Representation (Appendix x) which expand upon the points above and support our preference for Growth Option 6 to be pursued within the RLDP, and to ensure that the Council's Key Objectives are met within the plan period. Overall, it was unequivocally set out that Growth Option 6 is the most practicable and effective option, that will address the identified issues within the County by adopting an employment-led growth option that provides sufficient housing growth to realise the Council's goals and aims.

### *Spatial Options*

In addition to setting out options for the level of growth needed over the plan period, the RLDP also needs to consider and set out a clear spatial strategy for where this development should take place within the County. A total of four broad Spatial Distribution Options were identified and considered for allocating and concentrating growth within the County. These are as follows:

- **Option 1: Continuation of the Existing LDP Strategy** – Growth would be distributed around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development would be accompanied by new employment opportunities, where possible.
- **Option 2: Distribute Growth Proportionately across the County's most Sustainable Settlements** – Growth, including jobs and affordable housing, would be distributed across the County's most sustainable settlements, with the level of growth proportionate to that settlement's size and amenities, affordable housing need as identified in the LHMA, the capacity for growth and/or the need for development to sustain the community.
- **Option 3: Focus Growth on the M4 corridor** - Growth would be predominantly located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure connections, including via the South Wales Main rail line at Severn Tunnel Junction. Affordable Housing would be directed to those sustainable areas in the South of the County identified in the LHMA as having the greatest housing need.
- **Option 4: Focus Growth in the North of the County** – Growth would be predominantly located in the most sustainable settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Affordable Housing would be directed to those sustainable areas in the North of the County identified in the LHMA as having the greatest housing need.

Based on the assessment set out within the paper, Spatial Option 2 to Distribute Growth Proportionately across the County's most Sustainable Settlements is the Council's preferred Spatial Option. The option would provide proportionate growth in the most sustainable urban and rural areas, in accordance with the Sustainable Settlement Appraisal. It is considered that this spatial option provides a land use framework that will help to deliver the Council's core purpose of helping to build sustainable and resilient communities for current and future generations. Fundamentally, this option will enable the provision of a sufficient range and choice of homes, both market and affordable to be provided throughout the County's most sustainable settlements, the need for which has been heightened by the current pandemic.

Overall, this option is considered to be the most conducive to achieving the RLDP vision and the Council's core purpose of building sustainable and resilient communities across Monmouthshire.

**The detailed response prepared by us as Agent submitted in February 2021 (please refer to Appendix 2 for the full report) responded to the Growth and Spatial Options Paper's question relating to the Council's preferred spatial option. The key points within our response are as follows:**

- Spatial Options 2 and 4 are considered the most optimal i.e., a strategy that distributes growth to the County's most sustainable settlements and locations, particularly those in the North of the County.
- Option 3 'Focus on M4 Corridor' would not be sustainable, as it would result in an increase in out-commuting and unsustainable travel patterns dominated by use of the private car, and the lack of employment opportunities provided in the remainder of the County could increase out-commuting from these parts of Monmouthshire.
- Focusing the majority of growth on a new settlement would undoubtedly be unsustainable, as it would detract growth away from the main settlements of the County.
- Both Spatial Options 2 and 4 involve appropriately distributing growth across the County in sustainable settlements, which will assist in providing employment opportunities and access to market and affordable homes for a wide population.

Overall, the Representation submitted set out that Spatial Options 2 and 4 represent the most sustainable and favourable approaches to allocating and concentrating development within Monmouthshire – which are expanded upon in Appendix 2. This combination of the Spatial Options referenced, provide the best opportunity for Monmouthshire County Council to satisfactorily and appropriately address the key issues, challenges and opportunities that the County faces over the plan period.

## 2.4 - CANDIDATE SITE ADVICE

Prior to the submission of this LPD Candidate Site, and the opening of MCC's Second Call for Candidate Sites, Candidate Site Advice was sought from MCC for their thoughts / comments on the proposed strategic allocation. The request sought advice from, not only planning policy within MCC, but also other internal consultees including transport, noise, landscape, ecology and Affordable Housing. A subsequent meeting was undertaken between MHA, Geraint John Planning, Hammond and a number of internal MCC consultants whereby the proposed site allocation and its associated issues / matters were discussed in greater detail. This allowed a comprehensive and productive discussion to be held pertaining to the site's opportunities and constraints, and the level of assessment work / information required to form part of a robust and detailed case for the site's strategic allocation within the RLDP.

The Candidate Site Advice, which was sought by MHA, set out in the first instance, that the proposed use of the site would be a mixed-use development, comprising the following uses:

- 645 Residential Units;
- 6,141sqm Office;
- 7,978sqm Supermarket; and
- 6,750sqm Hotel.

As such, the meeting discussion was centred around the above proposed uses forming part of the allocation and how these uses can be brought forward and delivered within the RLDP plan period. As forementioned, a number of key issues / considerations were discussed within the meeting, and form part of the written response issued by MCC, and these are addressed sequentially below:

### 2.4A Future Wales: The National Plan 2040

From the outset of the meeting and the written response, the need to conform to the requirements of the pertinent policies within 'Future Wales: The National Plan 2040' has been eloquently conveyed to ensure that the proposed development is to be within the general conformity of this high level spatial plan. Future Wales supports sustainable and vibrant rural communities and allows for growth in rural areas of appropriate scale which support local aspirations and need. As such, the following policies within Future Wales are considered to be of relevance to the proposed allocation, as set out within MCC's formal written response:

- Policy 4 – Supporting Rural Communities
- Policy 5 – Supporting the Rural Economy
- Policy 7 – Delivering Affordable Homes

### 2.4B Phosphates

It was highlighted that Abergavenny (and the site) is located within the Usk Phosphate Catchment area and subsequently, any proposal within the catchment areas of the rivers that might increase phosphate levels will be required to clearly evidence that the proposed development can demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body.

As such, in order to attend to the above, MCC set out that a full drainage strategy is required to evidence the proposal's compliance with NRW's interim planning guidance and how the development will ensure that it does not have significant impact on water quality within the river SAC. In addition to this, the submission will also need to demonstrate that the site can be delivered within the plan period with any phosphate solutions proposed.

#### 2.4C Flood Risk

It was confirmed that the site does not presently sit within a C2 or C1 flood zone and therefore, not at risk of flooding in any event.

#### 2.4D Landscape/GI

MCC's written response clearly outlines that landscape impact is a key consideration within the County, given the sensitivity of its rural landscape and as such, the site is considered a sensitive location in close proximity to the Brecon Beacons National Park (BBNP), in particular the setting of the Skirrid Mountain. Commentary relating to the site's landscape sensitivity by MCC is provided below:

*'The susceptibility of the area lies in its location and character as unspoilt lower pastoral slopes complementing the landmark wooded hill of Ysgyryd Fach, its clear separation from the town by the railway and A465, and openness of low cut hedgerows and isolated farmsteads and its role as the lower part of the backcloth to the town with views from the west. Its value lies in its location adjacent to the essential setting to Coldbrook House Historic Park and Garden to the south as well as access on PROWs. LANDMAP value is outstanding for cultural landscape, and high for visual & sensory and geological landscape.'*

The Council's Landscape/GI Officer provided detailed comments and requirements for GI and landscape assessment, key GI opportunities and SUDs design – with the key comments provided below:

- *'The principle of development on the site is currently contrary to LDP policy. The site is outside of the settlement development boundary in open countryside and will have a significant adverse impact on the value of the Monmouthshire landscape.'*
- *'Based on the information provided to date we would have significant concerns / objections with regard to a development that would have unacceptable adverse effects on the special character or quality of Monmouthshire's landscape.'*
- *'A proposed development of this scale would effectively undermine and devalue a visually, historically, geologically and culturally important landscape that supports valuable landscape habitats.'*
- *'The scale and design based on the current draft layout does not respect the character of the surrounding area.'*
- *'The proposed site and layout does not demonstrate how the development will accommodate effective access for instance for pedestrians, cyclists and less mobile with the facilities within Abergavenny.'*
- *'Green spaces to be visually and ecologically connected they should seek to retain and enhance existing important habitats and provide green corridors that are multifunctional. In particular, these areas should not be used to deliver SUDs but be a combination of accessible, recreational and /or biodiversity benefit.'*
- *'Protection and incorporation of existing key GI assets such as woodland, hedgerows, trees, wetland, marshy grassland and ecological corridors to be identified through survey should be incorporated into the GI scheme design in a meaningful and substantive way, not fragmented and marginalised as part of a SUDS scheme.'*

Notwithstanding the above, MCC have outlined that despite the physical separation from the existing settlement of Abergavenny by the A465, it is felt by Council Planning Policy Officers that there is potential for considered and careful landscape mitigation at this site to bring it forward in the 2<sup>nd</sup> Call for Candidate Sites submission. Attention has been drawn to detailed comments provided by the Landscape/GI Officer, who has offered advice on key 'GI and landscape' opportunities in masterplan design.

## 2.4E Access/Highway

The advice given by MCC Highways outlined that a Transport Assessment would be required to inform any proposal, which should include consideration of a suitable access and the capacity of the existing highway network to accommodate proposed development. In addition to this, the following comments were provided relating to the proposed access of the site:

- *'The principle of access off the A465 is supported, however, as the A465 is a trunk road, this will need approval from WG Highways, and it is advised to engage at the earliest opportunity; and*
- *Explore the possibility of a secondary access.'*

## 2.4F Active Travel

The response outlined that consideration would need to be given to the transport hierarchy set out in PPW11, which priorities walking, cycling and public transport ahead of private motor vehicles, and to how future residents will access the town centre of Abergavenny. The Council's Active Travel Officer provided detailed comments / observations relating to the proposal:

### *Abergavenny Train Station*

A submission should indicate that the candidate site can provide active travel linkages/benefits to Abergavenny Train Station. In particular, the following should be considered:

- The Abergavenny rail station access & interchange improvements project has been accepted by the Cardiff Capital Region as MCC's second Metro Plus project;
- WG/TfW/Network Rail have received funding to develop a new footbridge at Abergavenny station. It is advised to liaise with these departments in order to try and provide a joined up approach (so that the footbridge can potentially provide access to the proposed candidate site);
- Huge potential to develop further car parking for the train station/ park and ride for visitors of Abergavenny; and
- Masterplan routes of how people walk & cycle to/from these places, including an analysis of the quality of the routes (compared to the active travel design guidance).

## 2.4G Agricultural Land Classification

The Welsh Government predictive ALC mapping indicates that Abergavenny is surrounded by a mixture of Best Most Versatile (BMV) land. As such, detailed agricultural surveys are required to be undertaken and submitted to form part of the LDP allocation submission.

## 2.4H Biodiversity

The Council's Biodiversity Officer provided comments and further requirements that will be expected to progress ecological considerations at this site. These are provided below:

- The retention and enhancement of the hedge lines, watercourses, waterbodies and woodland should be integrated into the design and opportunities such as provision of new ponds and green corridors through the site to improve habitat connectivity to the wider landscape should be included.*
- There are priority habitats within the development site, the proposals will need to demonstrate that there will not be an adverse effect on these habitats in order to meet the first part of the policy.*
- The proposal will need to demonstrate that key routes / foraging areas will be retained & protected and evidence will need to be provided that sufficient habitat can be maintained and enhanced in the long term via a Green Infrastructure Management Plan.*
- The status of the River Usk in this catchment (failing) and the scale of development, it is considered that the site would result in adverse impact on the integrity of the SAC. Significant consideration will need to be given to the deliverability of this scheme in light of the challenges around phosphorus management in the catchment.*
- There are a number of areas of woodland and veteran trees within the development site, these are protected by Tree Preservation Orders (Area, Group and individual TPO). We would expect all woodland areas and veteran trees to be retained and protected as part of the proposals, this will require robust buffers to development.*
- Hedgerows are considered a Priority habitat and we would expect retention of these important green corridors as part of the proposals, the development should seek to retain and bolster these features providing a substantial buffer to the development area.*
- We would expect the retention of all existing GI assets, woodland parcels, hedgerows, veteran trees and priority grassland habitats, where present, including robust vegetated buffers to these areas. The site should be connected via strong green corridors to other areas of green space, in order to retain habitat connectivity for the variety of protected species that use the site.*

## 2.4I Climate Change / Decarbonisation

The advice outlined that consideration is required to be given to the increased focus on climate change and decarbonisation issues, including the provision of digital infrastructure, EV charging and PVs on new dwellings. In view of the Council's declaration of a Climate Emergency, it has been strongly outlined that the site promoter should consider what measures will be taken as part of the proposal to address climate change.

## 2.4J Affordable Housing

The Council's Housing Officer provided the following comments on the type of housing need identified in the County:

- *There is a particular need for one bedroomed accommodation – permanent and temporary. MHA have a one bedroom model that can be converted to two bedrooms fairly easily, which offers flexibility and, therefore, seems logical;*
- *Part of our challenge is implementing a new WG standard for homeless accommodation. e.g. a requirement for self-contained homeless accommodation through their Phase 2 Annex D guidance. We have 70 units of shared temporary accommodation that we currently lease but ideally we need to be working to phase these out;*
- *There is a particular need for a 5/6 bed Multiple Needs Supported Housing facility for the North of the County.'*

Furthermore, the response details the identified need for affordable housing in Abergavenny, whereby it is considered by Council Officers that this is a key site to bring forward the 50% affordable housing requirement as outlined in the Preferred Strategy.

#### **2.4K Housing Mix**

Consideration is required to be given to the specific housing mix of the proposal. It has been outlined that the RLDP will include a specific policy for both affordable and market housing – to ensure the provision of the right type of housing enables settlements to remain balanced and meet the key issue of the RLDP to rebalance Monmouthshire's ageing demographic and provide opportunities for younger demographics / first time buyers to purchase property within the County.

#### **2.4L Infrastructure Capacity**

The response outlines that consideration should be given to the capacity of the existing infrastructure to serve any proposed development, including schools and DCWW infrastructure.

#### **2.4M Viability**

Welsh Government require all Candidate Sites to be subject to a viability assessment, and that PPW11 notes that landowners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of sites at the Candidate Site stage.

#### **2.4N Advice Relating to Site**

The Council have advocated within their formal written response, and within the Candidate Site Advice meeting, that there is potential for a strategic site allocation in the town. The Preferred Strategy (June 2021) sets out that Abergavenny is one of Monmouthshire's Primary Settlements which indicates a required allocation of approximately 887 new homes. The suggested 645 units proposed under this proposal is below the new dwelling requirement, however, MCC have outlined that the size of allocations will be dependant on other detail sequential site assessments. MCC have confirmed they are happy to work with the site promotion team and to maintain a dialogue in relation to numbers within a site.

Given high standard of green infrastructure and open space, the implications of SUDs within a development and landscape sensitives, the Council have stated that they are looking for a mix of density form approximately 25-50 dwellings per hectare. This is, of course, dependent on context and detailed designs/landscape/visual impact.

#### *Supermarket*

The Council have unequivocally confirmed that they do not support the proposal of an approximately 8000sqm supermarket within the site. The Council's most recent retail expenditure study states that *'the town's convenience expenditure capacity is broadly in balance throughout the forecast period'* suggesting there is limited need for further convenience goods floorspace in the town to 2033. Furthermore, it is outlined that an out of town supermarket would be contrary to national and local planning policy. However, MCC have confirmed that they would be supportive of a local store / local centre within the site to meet convenience needs of residents.

#### *Hotel*

MCC are supportive of the inclusion of a hotel of an appropriate scale within the site proposal, as it is felt there is potential that a hotel in this location can have a positive impact upon Abergavenny's / Monmouthshire's economy.

#### *B1 Offices*

The inclusion of B1 office use is considered beneficial to the site. The RLDP policy framework will support/enable economic and job growth, and it is considered that this location is highly sustainable adjacent to Abergavenny railway station, and is therefore potentially considered suitable for a B1 allocation. MCC also recommends that consideration is given to the provision of flexible/office space as a 'remote working hub' for people to work from. Building Better Places highlights the need to provide flexible workspace with access to office environments and facilities.

### **2.40 Key Considerations**

MCC have outlined within their written response the key considerations for the proposed Candidate Site, and these are as follows:

- *'We are aware that there is potential for the land south of the site to come forward and we advise (if it is possible) to work with land owners and/ or other acting agents in order to promote the site.'*
- *Masterplan how the site would link to the existing settlement i.e. permeable active travel routes into Abergavenny settlement – attention is drawn to the fact that Network Rail/ TfW are currently progressing a proposal to install a new footbridge over Abergavenny station - can this be linked to the candidate site?*
- *The site's proximity and its relationship with the train station is key advantage for inclusion with the RLDP.*
- *Huge potential to develop further car parking for the train station/ park and ride for visitors of Abergavenny.*
- *Engagement with WG Highways to demonstrate that access off the A465 is realistic/deliverable.*
- *Explore having two access points/ having a secondary vehicular access to the site.*

- *Fully explore potential to provide 50% affordable housing provision within the site/within part of site. This is considered by Council Officers as a key site to bring forward this affordable housing provision. We are happy to work with you in relation to this affordable/market housing tenure/mix balance to ensure a deliverable site that meets the needs of our local population and addresses our demographic trends.*
- *Landscape mitigation of developing within a sensitive landscape.*
- *Demonstrating that proposed development will actively mitigate against climate change and to demonstrate its carbon footprint/ impact.*
- *Solutions of developing within a phosphate catchment area.'*

## **2.4P Conclusion**

The above points conveyed, relating to the proposal, spanning across the various technical MCC disciplines, have been taken into account to-date, and have allowed for further detailed work to be carried out to support the submission of this candidate site. Key advice / guidance provided by the relevant consultees within the Council have informed the site promotion consultant team to undertake / finalise their assessments and reports to attend to the key matters raised within the formal meeting and written advice, to ensure that a sound and robust submission is made, unequivocally demonstrating and evidencing that the site is acceptable for candidate site allocation. These key matters, which have taken into account the above advice and requirements, are provided in detail in the proceeding sections.

### 3.0 SITE DETAILS

#### 3.1 - THE SITE (Q2.A-Q2.F)

The site comprises a number of co-joined grassland fields and buildings / uses, low cut hedgerow networks, a woodland corridor and existing trees, measuring approximately 24.75 hectares (ha), on the eastern edge of the urban boundary of the settlement of Abergavenny (which lies within the administrative boundary of Monmouthshire County Council). The site also contains a number of watercourses, hedgerows, trees and other features within its boundaries. The site comprises an irregular parcel of land, which stretches narrowly from north to south, and contains a number of land parcels within its boundary. An annotated site aerial indicating the extent of the site and the site and its wider surrounds, are included below:



*Aerial View of Site*

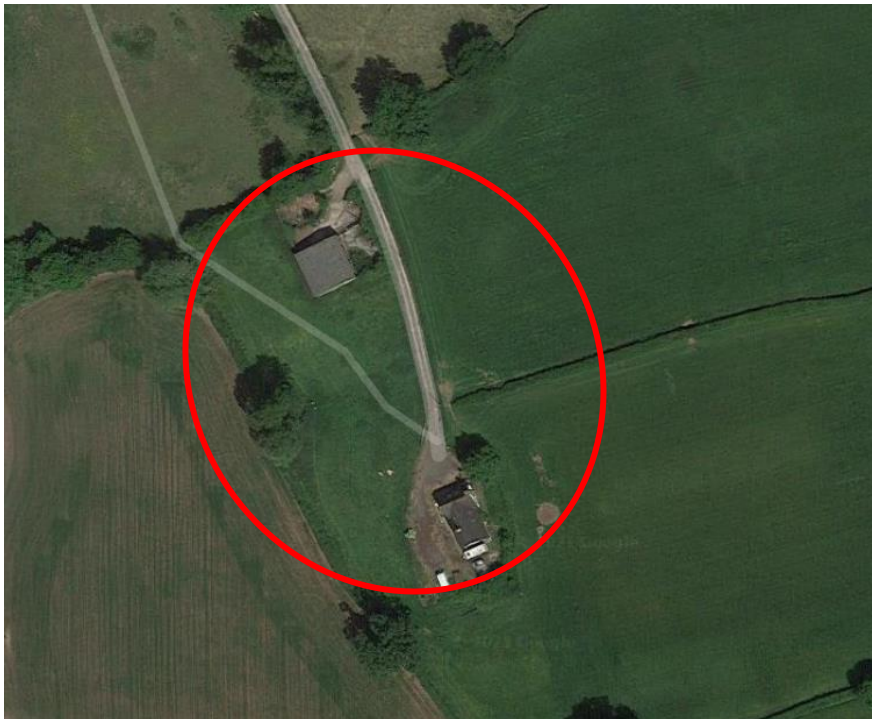


*Site and its Surrounds*

The site is bordered by the following land uses:

- To the north by agricultural / farm building and land, beyond which is the B4233 which provides access from Abergavenny to a number of small villages within Monmouthshire;
- To the east by other agricultural / farm buildings and land, and wooded upper slopes associated with Ysgyryd Fach 'Little Skirrid' further afield;
- To the south by more agricultural land and uses and the A40 / A4042 which provide travel to the key settlements on Pontypool, Cwmbran, Newport and Cardiff, and land associated with Coldbrook Park, a Historic Park and Gardens; and
- To the west by the A465, which abuts the western boundary of the site, Abergavenny Train Station and the rail line, and the principal settlement of Abergavenny beyond.

The site includes a number of buildings towards the centre of the site comprising of open metal barn structures and residential dwellings. The existing buildings associated with the site are outlined below:



*Aerial View of Site showing existing central buildings*



*Existing Buildings within Site*

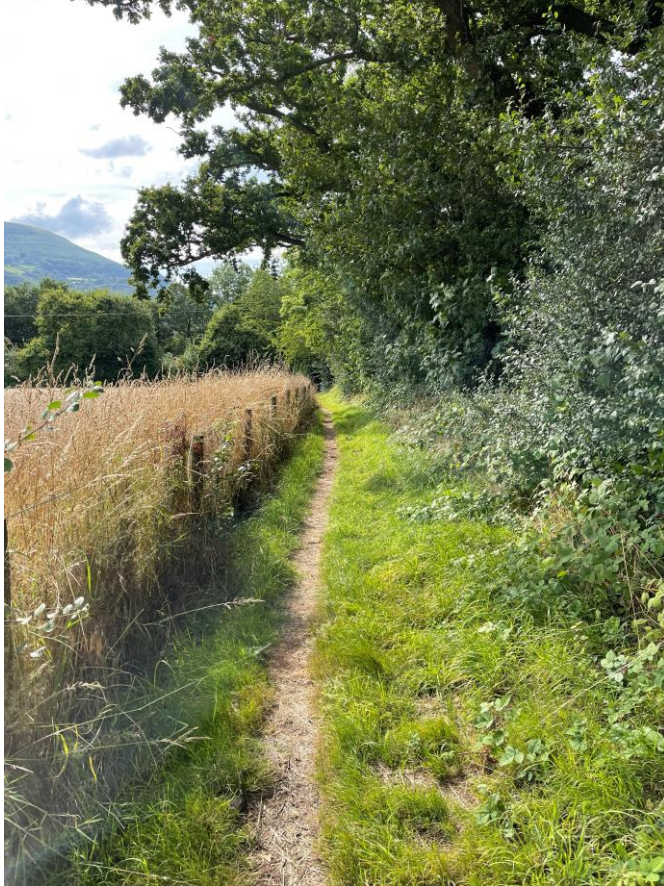
There are a number of trees and mature vegetation located along the perimeter and within the site, particularly within the southern section of the site whereby a number of trees line the existing watercourse that runs from east to west within the site.

Access to the site is currently obtained from the western boundary, from the A465, and this provides access to the existing dwelling and buildings located within the northern section of the site via an unnamed access road (running in a north south direction through the site). This is shown in the image below:



*Existing Access*

A public footpath also runs west / east through the southern section of the site which provides a pedestrian linkage to the adjacent 'Little Skirrid.' This is shown overleaf which dissects the boundary of the candidate site.



*Existing PROW within Site*

The boundaries of the site are formed, in part, by mature vegetation and partly by hedgerows and trees, immediately adjoining the relevant highway and surrounding land parcels. Both the western and eastern boundaries are also formed by developed uses, comprising existing farm buildings / dwellings and the A465 highway.

A considerable portion of the site's boundaries consist of mature hedges and trees, which provide effective screening for the site.

### 3.1a - Wider surroundings

As previously outlined, the site is being promoted in conjunction with adjacent land to come forward to achieve the wider strategic vision to create a sustainable and logical extension / mixed-use neighbour east of Abergavenny. Additional land could also come forward for development under the ownership of the promoting party which can be utilised for additional access, green infrastructure, landscape and/or ecology mitigation. These additional areas are denoted within the plan below:



*Approximate Site Boundary, Other Landownership and Adjacent Promoting Land*

### *Services and Facilities*

The location benefits from Abergavenny Town Centre (0.7km) to the north west which comprises of several convenience stores, including a Morrisons Superstore, Aldi, Tesco Express and Abergavenny Market. The Town Centre also consists of a number of other smaller services and facilities including a number of places of worship, post office, health facilities, pharmacy, public houses and a number of banks.

There are also a number of other services and facilities across the town of Abergavenny which are of pertinence, including Abergavenny Cricket Club, Leisure Centre, Nevill Hall Hospital, Bailey Park, Abergavenny Driving Test Centre and Abergavenny Museum.

As outlined above, the nearest hospital is Nevill Hall Hospital, which is situated approximately 2km from the site, whilst the Grange University Hospital is located approximately 18km in Cwmbran south to the site.

These nearby services and facilities within Abergavenny are mapped in section **5.14 Local / Community Facilities and Open Space** within this Report.

### *Transport*

In terms of services and facilities, the site sits immediately adjacent to Abergavenny train station (to the west) – whereby the closest point between the two measures approximately 170m. The site and the train station are dissected by the A465 and currently, cannot be accessed via pedestrian walkways. The station does comprise significant sustainable travel provision allowing access to a number of key towns and cities within Wales including Cwmbran, Newport, Cardiff, Bridgend, Swansea and Carmarthen. The station also benefits from being located on the Manchester Piccadilly service which enables travel to Hereford, Shrewsbury, Crew and finally Manchester. As such, the site profits in terms of its sitting adjacent to Abergavenny train station, which allows for sustainable travel within the immediate and wider region.



*Abergavenny Train Station*

In terms of bus provision, there are a number of bus stops located within the adjacent residential area (other side of A465), which provide hourly sustainable travel to Abergavenny and Brynmawr. The bus stops are served by the no.3 service, and are located on Holywell Crescent. There are also other bus stops located on the A40, situated to the south-west of the site near the roundabout. These bus stops are served by a number of services including no.X3, no. 83 and no.43 which enable bus travel to Abergavenny town centre, Brecon and Hereford.



*Bus Stops Near Site*



### *Built Form*

The site is surrounded by a mixture of uses and built form. To the immediate west lies the urban built form of Abergavenny, in particular the predominant residential areas that sit east of the A40 road which runs through Abergavenny. A number of these residential areas comprise cul-de-sacs and crescents, whereby the majority of properties are three / four-bed semi-detached / detached dwellings – which is representative of the typical form and character of the existing built form observed in Abergavenny.

To the immediate east and south of the site the setting is more rural and less developed in nature (predominantly farmland and open countryside), with the presence of small villages / hamlets further afield in the countryside of Monmouthshire.

To the north, again the setting is more rural and less developed in character comprising typical open countryside features and agricultural land / buildings. Beyond this, the eastern areas of Abergavenny are located which follow / abut the boundary of the A465 south to north.

In terms of surrounding built form, the following provide a representation of the form and character of the existing urban character to the west of the site:



*Typical Housing in Plas Derwen Way*



*Typical Housing on Belmont Crescent*



*Typical Housing on Holywell Crescent*



*Typical Housing on Maes Y Llanwydd*



*Abergavenny Driving Test Centre*



*Abergavenny Town Centre*



*Morrisons in Abergavenny*

The site is also adjacent to a small office and industrial area, next to the train station, which consist of a number of B Class units. The area is known as 'South Wales Chamber of Commerce' and includes a number of companies including Pawfection, Little Boxes, Abergavenny Tiles and Siam Health Massage. These uses are supported by their own parking provision and provide a number of employment opportunities within the locality.



*South Wales Chamber of Commerce*

## 3.2 – CURRENT / PROPOSED USE OF SITE (Q2.g-Q2.i)

### 3.2a – Current Use

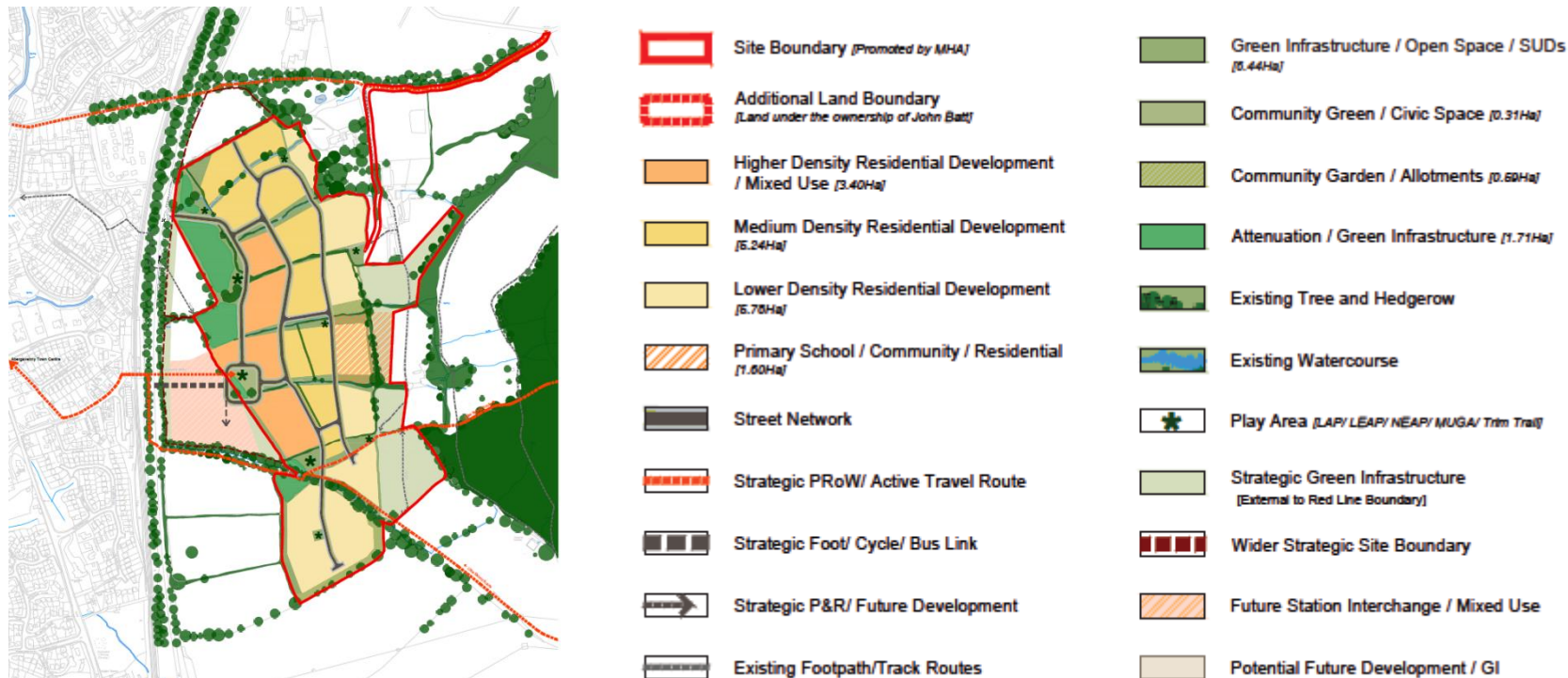
As previously outlined, the current use of the site is agricultural use, which encompasses improved grassland, arable field, poor semi-improved grassland, broad-leaved and mixed woodland, hedgerows and farm buildings. The farm buildings include those at Garth Farm and Roc House Farm. The grazed improved grassland fields contain horses and sheep – which are owned by the landowners / farmers for the current pastoral use of the land.

A series of images are provided below illustrating the existing context / use of the site:



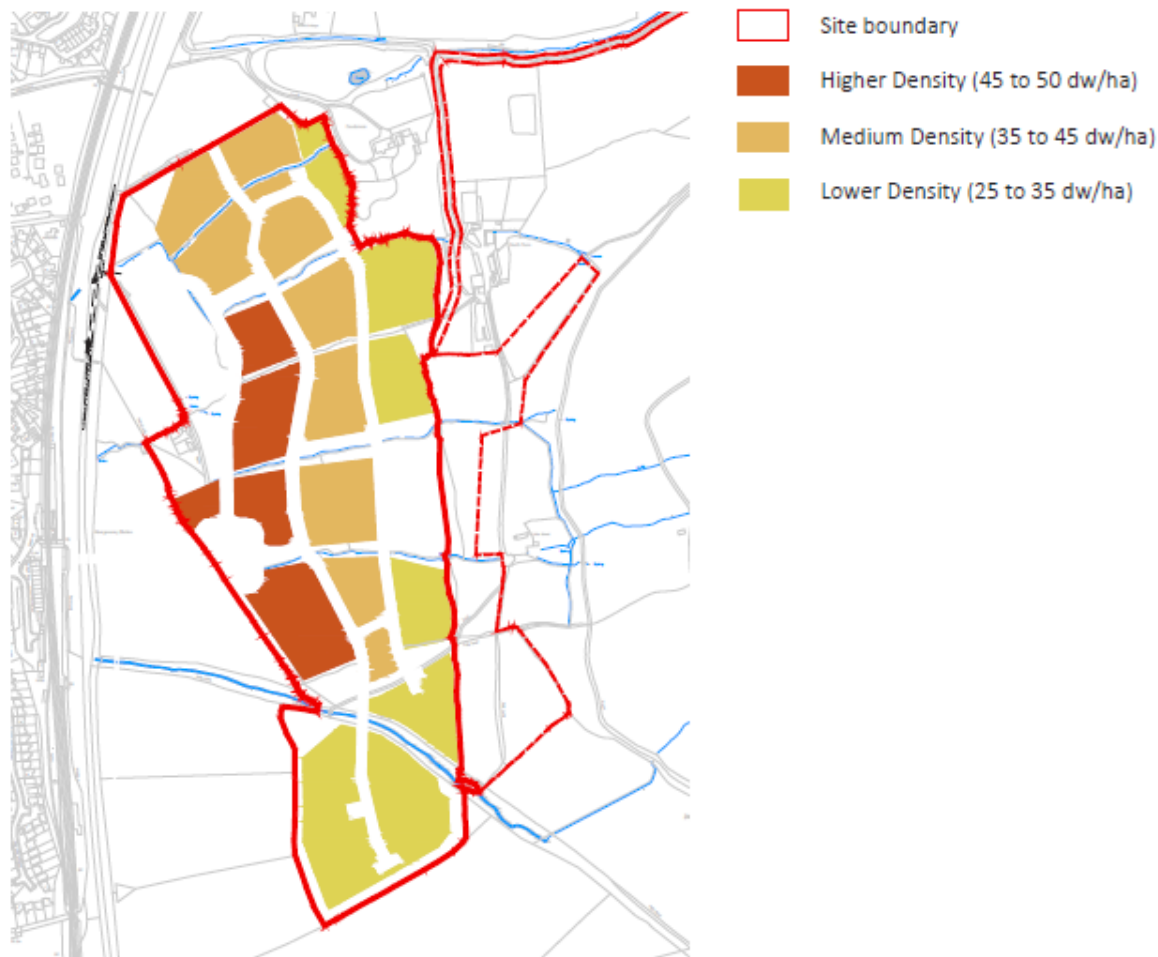
### 3.2b – Proposed Use

This section of the report outlines the proposed site and development proposals. In doing so it does so in brief form – given that the proposals are set out and described in more detail within 'Placemaking Booklet' prepared for and submitted alongside this technical report. A Land Use Framework has been submitted and provided below, providing an overall framework for the site and the proposed uses to be included within the candidate site.



Land Use Framework

The proposal seeks to provide up to circa. 635 new dwellings, including a 35% affordable housing provision. 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 observed within the County, and provide opportunities for younger demographics / first time buyers whilst also complying with key community and placemaking objectives. The proposal represents an excellent opportunity to meet the Council's vision to create and deliver a sustainable and resilient community.



*Proposed Density Plan*

The proposal also seeks to provide a Local Centre comprising mixed uses including small scale retail, commercial and community units and residential space on upper floors. The new centre will be focused on the proposed Community Green (civic space). A 'Smart Work Centre' could be accommodated within this area of the site, which would provide office space provision for home workers or people working remotely.

It is envisaged that within the wider strategic area being promoted east of Abergavenny, a new 'Station Interchange' for the train station would be created and appropriate uses would include a Park & Ride, complimentary leisure/retail/employment uses and residential. The proposed development will seek to use the existing link between this adjacent land, and the train station across the A465, to allow pedestrian access to nearby public / sustainable travel provision. This link will be over and above considerable, other points of linkage and connection with the existing settlement and its facilities to the west.



Proposed Local Centre

A Woodland Community Hub will be established at the foot of Skirid Fach, on a key recreational route aligned with the Local Centre and Station Link. This unique location will offer an opportunity to provide an indoor and outdoor venue for a range of different user groups to meet, network and learn new skills. A Community Building could be provided within this area to offer flexible space that could accommodate community groups, and support artisan entrepreneurs and social enterprises, encouraging co-working and knowledge share. A new Community Woodland is also proposed which will context and extend the existing hillside woodland and greenways.

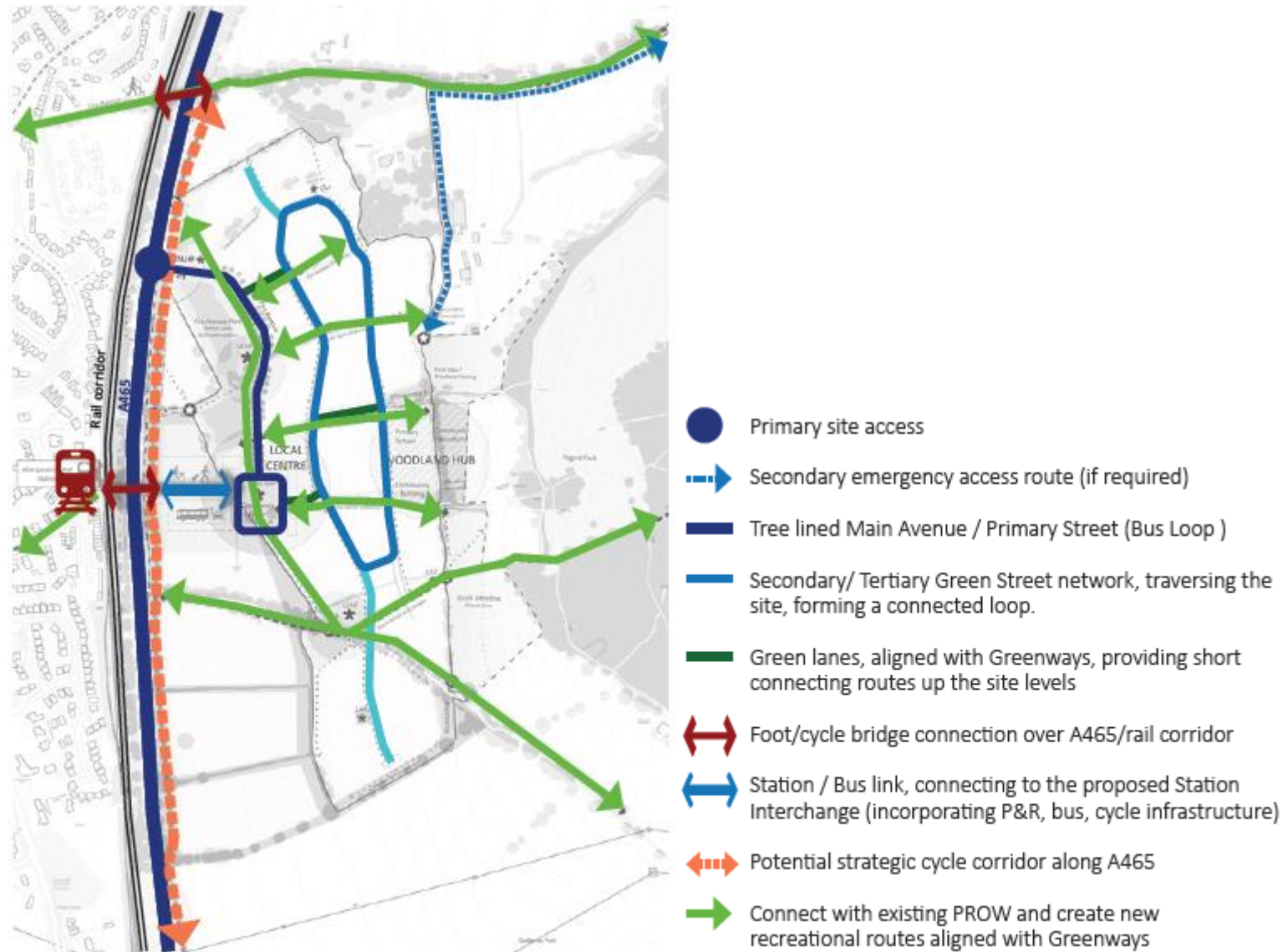


*Proposed Woodland Community Hub*



The proposed access and primary street network have been designed to accommodate the range of vehicles that will serve the site, including bus provision. A secondary emergency access connection is achievable to the north east of the site via Garth Farm, which will connect to the B4233 road. The proposal will also see the creation of a pedestrian and cyclist focused environment. The site will be served by a network of new and existing footpaths and cycleways that link to the wider area and existing PRoW network – which will be attractive and comfortable, consistent with the encouragement of mobility for all. These walking and cycling connections will be enhanced and created, on and off-site, to safely link existing and future residents and visitors with the local centre, Abergavenny town centre and the rail station – which will include the provision of a new foot and cycle bridge connection over the A465 / railway corridor, aligned with the existing PRoW network.

Given the above, a legible / connected form of development is proposed within the site.



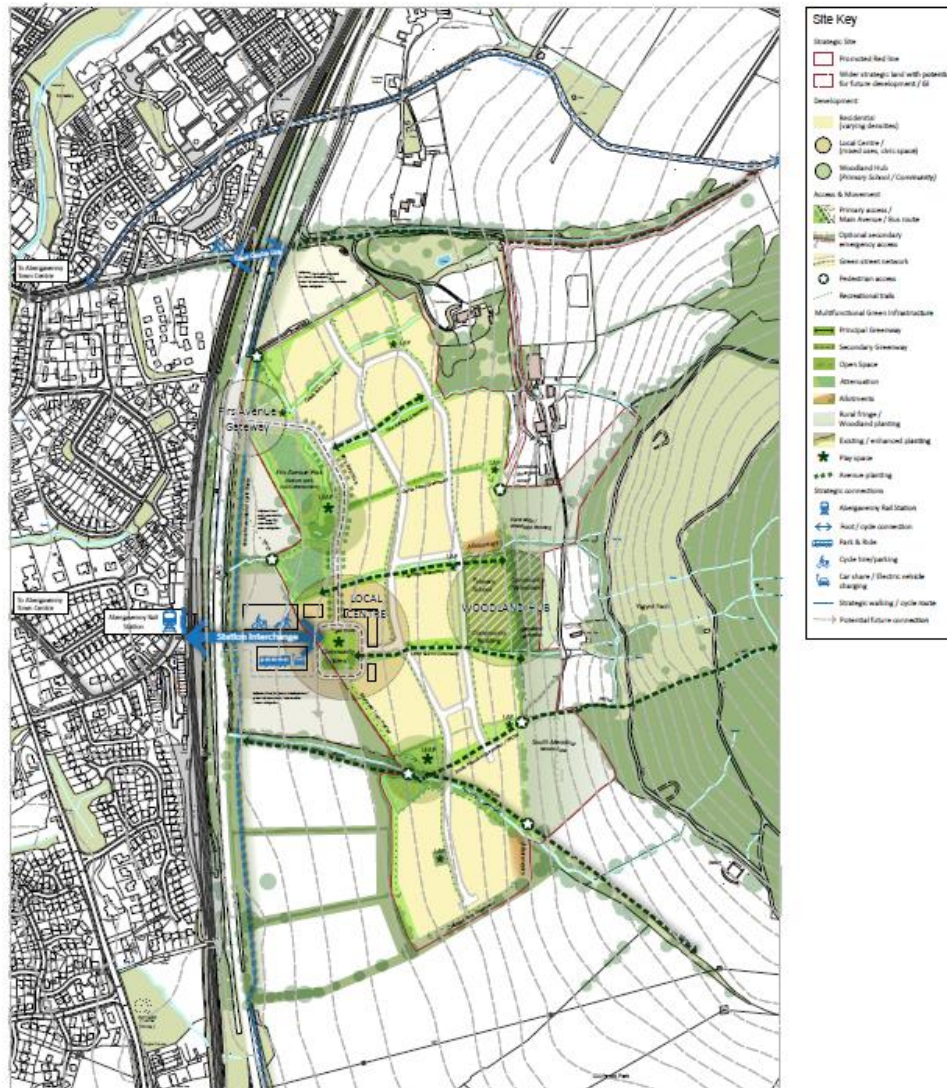
Movement Framework

In summary, the proposals for the site propose the following uses:

- Residential Development – up to 635 dwellings;
  - A mix of housetypes and tenures across the site to cater for a variety of needs;
- Local Centre;
  - Including small scale retail, commercial and community units;
- Smart Work Centre;
- Community Building;
- Woodland Community Hub;
- Education Provision;
- Public open space;
  - Informal POS / Formal play areas – ‘Community Green’;
  - Connection links to existing PRoWs;
- Green Infrastructure;
  - Retention and enhancement of existing boundary features;
  - GI through the street level as well as in POS;
- Blue Infrastructure in the form of SUDS basins.

It is the aim of this proposed development to adhere to, compliment, and enhance the concept of a sustainable community which can sit alongside and strengthen the existing and emerging built form and uses located adjacent to the site’s western boundary. The scale of the proposed development has been carefully designed to ensure that it is considered acceptable, appropriate, and set in consideration of the environmental capacity of the site, the viability of the scheme and density of surrounding development.

The masterplan demonstrates the proposed layout of the site, including indicative open space and landscape provision. It illustrates that the indicative built form respects the context of the site, has the ability to provide adequate amenity and privacy, whilst also integrating and responding to the site context. The development proposals seek to link with existing habitats and create continuous corridors in order to integrate the proposed areas of open space and landscaping enhancement with the existing landscape features. These are all fundamental principles of placemaking – which the scheme is underpinned on. A holistic approach to the planning and design of the development and the spaces it creates has been adopted. The scheme seeks to draw upon the site’s potential to create high-quality development that promotes well-being in the widest sense. The masterplanning approach to the scheme considers the site’s context, and its relationship to its wider surroundings. Placemaking has, accordingly, been considered at the earliest possible stage.

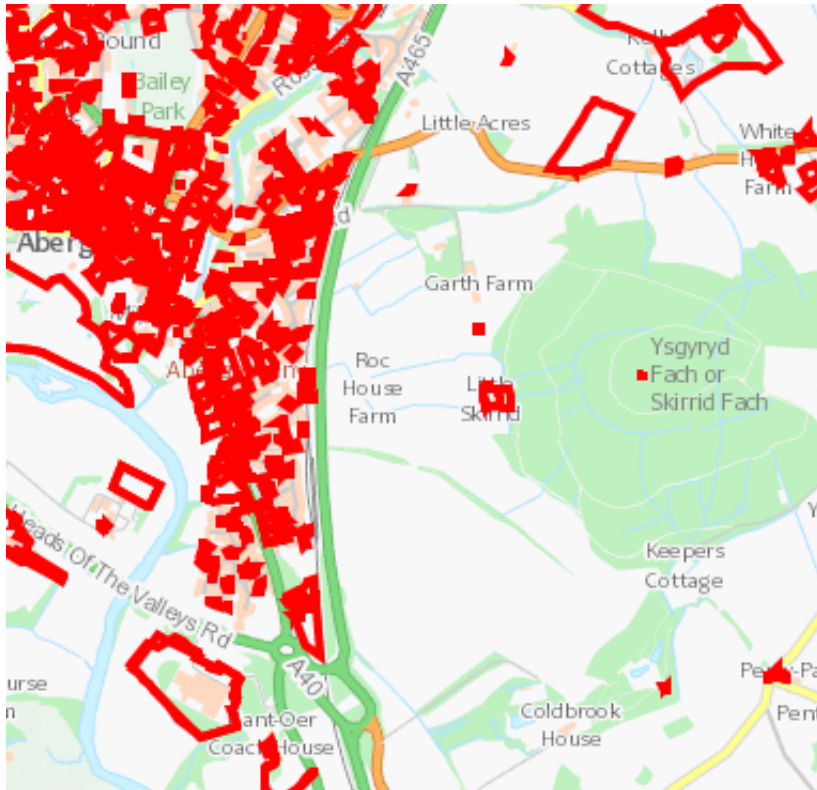


Illustrative Concept Masterplan

### 3.3 – SITE HISTORY (Q2.j-Q2.k)

#### 3.3a – Site History (Previous Applications)

The site and surrounds have an extensive planning history, whereby a number of applications have been submitted for a number of different uses / proposals. The key principal planning history relevant to this submission is set out in the following map and table:



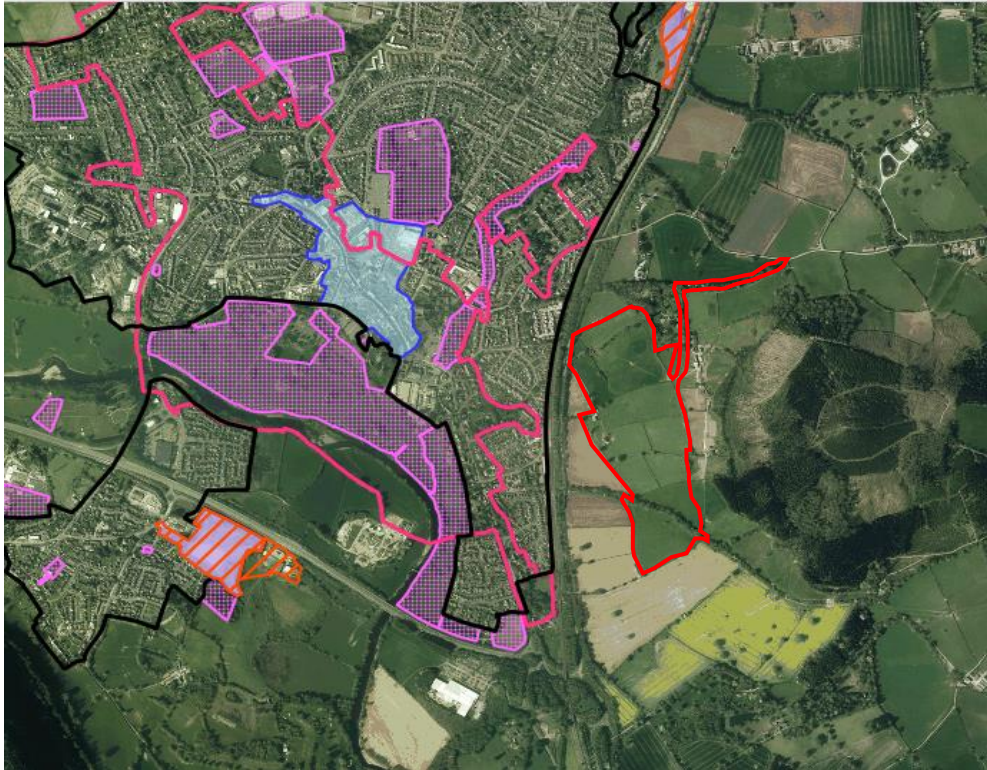
Map depicting principal planning history

| Application Ref         | Site Address                                                                                                         | Application Description                                                                                                                                                                                                                                                                                                                                                   | Decision  | Decision Date |
|-------------------------|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|
| <b>The Site</b>         |                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                           |           |               |
| DM/2020/01243           | Little Skirrid Cottage<br>Old Monmouth Road<br>Abergavenny<br>Monmouthshire NP7 9SN                                  | Proposed new garage building. Change of use of agricultural land to form extension of existing domestic curtilage.                                                                                                                                                                                                                                                        | Approve   | 08 Dec 2020   |
| DC/2016/01460           | Little Skirrid Cottage,<br>Old Monmouth<br>Road, Abergavenny,<br>Monmouthshire, NP7 9SN                              | Proposed two storey extensions                                                                                                                                                                                                                                                                                                                                            | Approve   | 03 Feb 2017   |
| DC/2017/01091           | Little Skirrid Cottage,<br>Old Monmouth<br>Road, Abergavenny,<br>Monmouthshire, NP7 9SN                              | Proposed bay window, single storey extension to southwest elevation.                                                                                                                                                                                                                                                                                                      | Approve   | 11 Oct 2017   |
| <b>The Surroundings</b> |                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                           |           |               |
| DC/2015/01378           | Installation Of<br>Telecoms Tower on<br>Land Known As Little<br>Skirrid, Coldbrook,<br>Abergavenny,<br>Monmouthshire | Installation of a lattice telecoms tower to supply broadband to the surrounding area as part of a contract awarded by the Department of Culture, Media, and Sport to supply superfast broadband to a number of rural areas in Monmouthshire where traditional means are unavailable. This installation will be in two phases, as advised in the supporting documentation. | Withdrawn | 19 May 2017   |

|               |                                                                                                      |                                                                                                                                                                                |          |             |
|---------------|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------|
| DM/2019/01917 | Tredillion Park<br>Tredillion Road<br>Llantilio Pertholey<br>Abergavenny<br>Monmouthshire NP7<br>8BB | Change of use of existing dwelling to create a 17-bed hotel, wedding and function venue with ancillary accommodation and associated refurbishment, extension, and alterations. | Approve  | 20 Feb 2020 |
| DC/2015/01587 | New Build<br>Residential Plots at<br>Coed Glas, Coed<br>Glas Lane,<br>Abergavenny,<br>Monmouthshire  | Demolition of existing buildings, and re-development of the site to include 51no. residential dwellings, and associated works                                                  | Approved | 03 Nov 2016 |

### 3.3b – Adopted LDP

The following extract of the current LDP Proposals Map for the site shows that the site is situated adjacent to the current settlement boundary:



*Extract taken from Monmouthshire's Proposals Map (Site outlined in Red)*

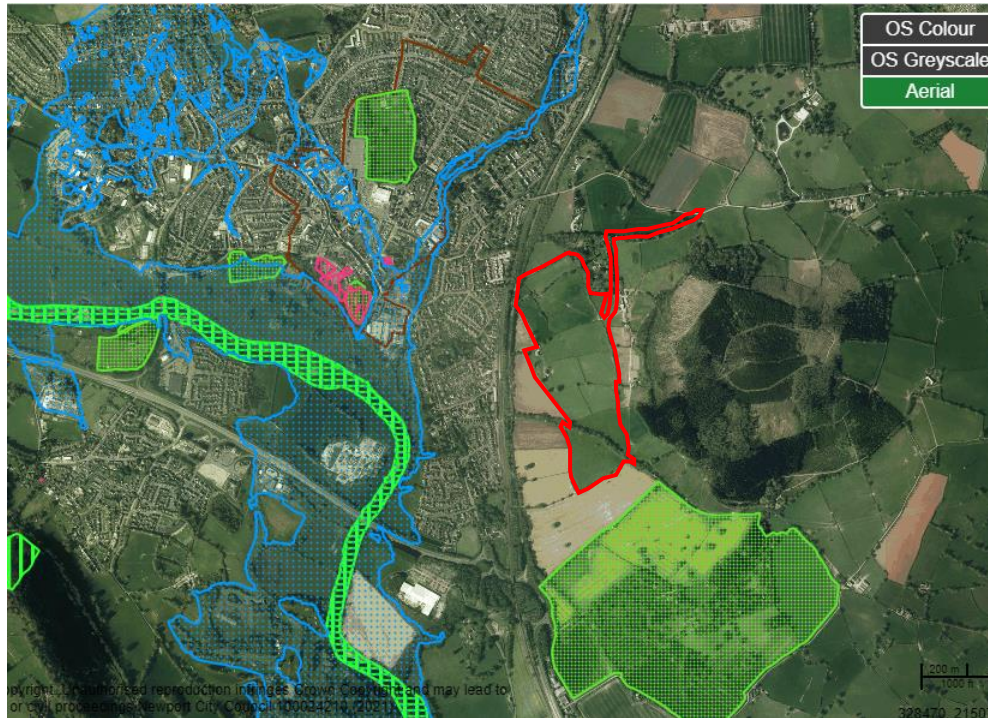
| Key                                                                                 | Allocation                   |
|-------------------------------------------------------------------------------------|------------------------------|
|  | Site Boundary                |
|  | Area of Amenity Importance   |
|  | Brecon Beacons National Park |
|  | Central Shopping Area        |
|  | Conservation Area            |
|  | Waste Site                   |
|  | Development Boundary         |

The current LDP Proposals Map shows the following allocations and designations:

The Site:

- Is adjacent to the 'Settlement Boundary'; and
- Does not have any allocation or designation.

An extract of the current LDP Constraints Map is provided below:



Extract taken from Monmouthshire's Constraints Map (Site outlined in Red)

| Key | Constraint                          |
|-----|-------------------------------------|
|     | Historic Parks and Gardens          |
|     | Tan15 Development and Flood Risk C2 |
|     | Scheduled Ancient Monument          |
|     | Area of Archaeological Sensitivity  |

The current LDP Constraints Map shows the following physical constraints

The Site:

- Is adjacent to an Historic Park and Garden;
- Not located within any other constraint.

As evidenced in both the Proposals and Constraints Maps, the site is not restricted by any physical constraints and sits adjacent to the settlement boundary of Abergavenny – illustrating that the proposed allocation would form a logical extension.

## 4.0 OWNERSHIP

The site promoter is Monmouthshire Housing Association, who have an appropriate agreement in place with landowners. The site is in the ownership of two landowners, who are committed to bringing the site forward for future development, and are committed to working collaboratively and jointly with the site promoter in advancing the proposals. The site promoter is an established developer / housebuilder with an extensive track-record of delivering high-quality developments within the County. Examples of these include:

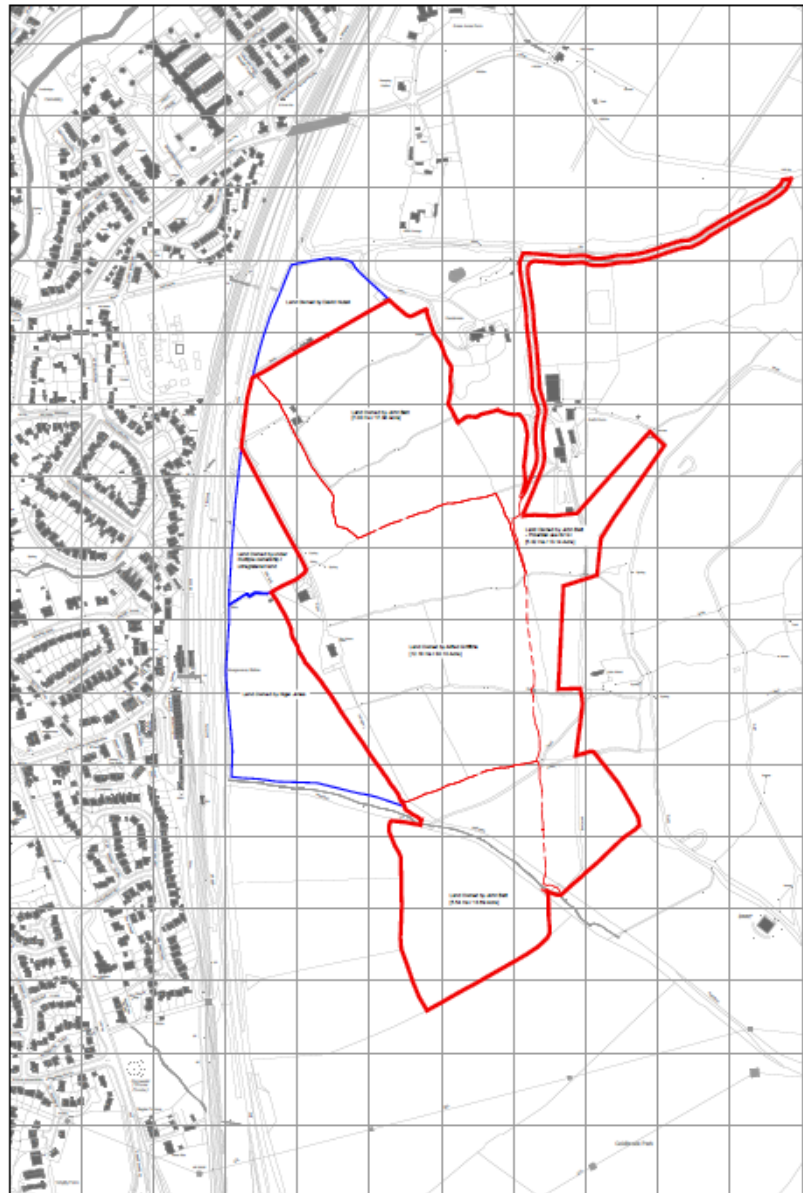
- 1. Clos Ger y Nant, Caldicot** – a development of a 25no. two, three and four bedroom home scheme comprising apartments, bungalows and houses.



**2. Pembroke Road and Western Avenue, Chepstow – development of 17 'innovative' homes across two derelict ex garage sites.**



A map of the landowners' ownership, including adjacent land, is included overleaf, which has been submitted in accordance with this candidate site submission.



#### Site Key

- Red Line Boundary  
25.45 Ha / 62.91 Acre
- Blue Line Boundary

## **5.0 SITE SUITABILITY (Q3)**

### **5.1 – FUTURE WALES: THE NATIONAL PLAN 2040 (Q3.a)**

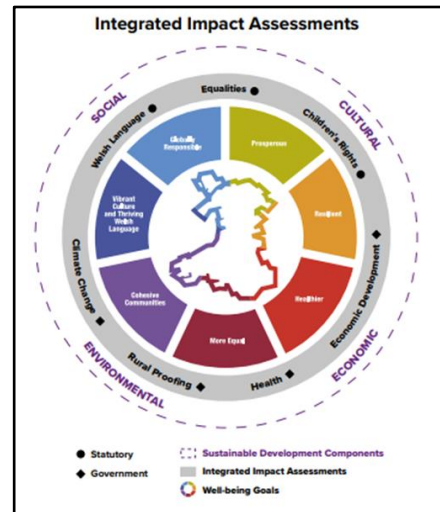
As set out within the 'Candidate Site Advice' issued by the Council, in response to the proposed site allocation at this site, a number of Future Wales: The National Plan 2040 policies are considered of pertinence to development at this candidate site, and require any development to comply with their policy requirements.

#### *Background to the plan*

Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan as the national development framework setting the direction for development in Wales up to 2040. Future Wales represents the highest tier of development plan and focuses on solutions at a National Scale setting out a framework which will inform Strategic Development Plans at a regional level and Local Development Plans (LDPs) at local authority level. The document consists of a development plan which aims to set out a strategy for addressing key national priorities through the planning system. These include, but are not limited to, developing a vibrant economy and improving the health and well-being of communities. The document is aware of challenges including the climate emergency and the ongoing effects of the global health pandemic and, in fact, aims to re-energise the economy in a sustainable way.

#### *Integrated Sustainability Appraisal*

Future Wales recognises the importance of The Well-being of Future Generations Act, discussed in detail in the next section of this document, and its obligations. The Wellbeing of Future Generations Act has influenced Future Wales and its principles, including the 5 ways of working (long-term thinking, prevention, collaboration, integration and involvement) which have actively been embedded into the plan. Through the development of Future Wales, the plan has been subjected to the Strategic Environmental Assessment and Sustainability Appraisal approach, shown in the image below, as well as other impact assessments. Through this approach, ongoing stakeholder engagement and the use of the Well-being of Future Generations Act to inform the plan, the principles of sustainable development have been embedded within Future Wales.



*Integrated Impact Assessment*

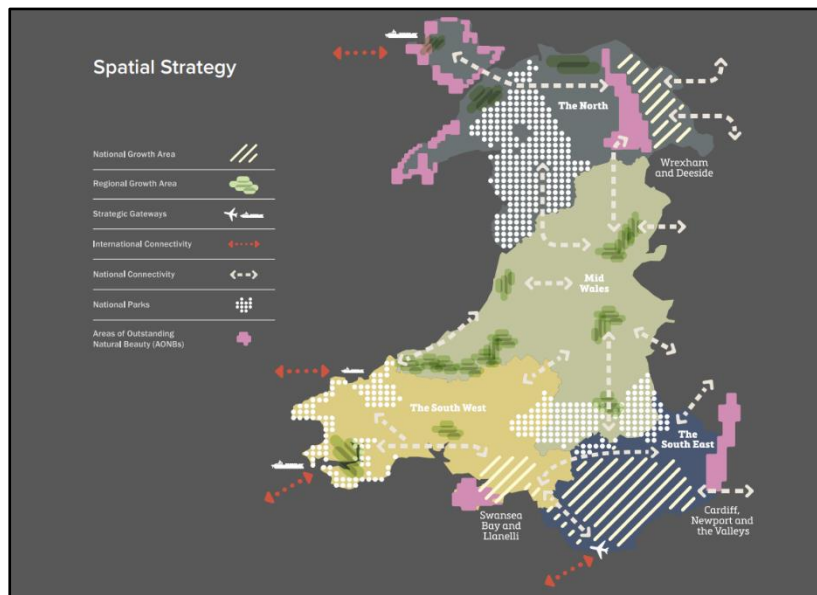
### *The Future Wales Outcomes*

In order to achieve its vision by 2040, Future Wales has set out 11 outcomes which act as overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales. The 11 Outcomes effectively represent the goal for Wales in 2040. These outcomes include:

- A Wales where people live and work in connected, inclusive and healthy places;
- A Wales where people live in vibrant rural places with access to homes, jobs and services;
- A Wales where people live in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- A Wales where people live in places with a thriving Welsh language;
- A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;
- A Wales where people live in places with prosperity, innovation and culture are promoted;
- A Wales where people live in places where travel is sustainable;
- A Wales with world-class digital infrastructure;
- A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
- A Wales where people live in places with biodiverse, resilient and connected ecosystems; and
- A Wales where people live in places which are de-carbonised and climate resilient.

### *Future Wales Spatial Strategy*

The Future Wales' spatial strategy sets out a 'guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefits of everyone in Wales.' Whilst Future Wales encourages development in cities and large towns to grow urban areas and utilise the potential of these places, it must be noted that the plan also states that 'in all parts of Wales the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy'. An extract of the Wales spatial strategy, identifying south east Wales as a national growth area, is provided overleaf. For the south east Wales region, the Future Wales plan states that 'housing, economic growth, digital and transport connectivity infrastructure should be co-ordinated and planned on the basis of the whole region. The management of natural resources, flooding and the protection and enhancement of areas of environmental and landscape important should inform strategic decisions on locations for growth and new infrastructure.'



### *Future Wales Spatial Strategy*

### *Relevant Policies to the proposals*

The following policies from Future Wales are deemed relevant to the proposals:

- Policy 1 (Where Wales will grow);
- Policy 4 (Supporting Rural Communities);
- Policy 5 (Supporting the Rural Economy);
- Policy 7 (Delivering Affordable homes);
- Policy 9 (Resilient Ecological Networks and Green Infrastructure);
- Policy 11 (National Connectivity);
- Policy 12 (Regional Connectivity);
- Policy 13 (Supporting Digital Communications);

As set out previously, the Candidate Site Advice obtained from the Council, outlined the necessity for the submission to demonstrate the proposal's compliance with a number of Future Wales Policies, namely 'Policy 4 – Supporting Rural Communities', 'Policy 5 – Supporting the Rural Economy', and 'Policy 7 – Delivering Affordable Homes.' As such, these policies are reproduced in full below, in accordance with an assessment of the candidate site's compliance with their policy requirements.

### *Policy 4 – Supporting Rural Communities*

This policy outlines Welsh Government's prevailing aspirations to achieve sustainable and vibrant rural communities, in order to support appropriate and proportionate growth to the needs of rural settlements and the wider areas they serve. In particular, the Policy states the importance that Strategic and Local Development Plans "*must identify their rural communities, assess their needs and set out policies that support them.*" Furthermore, policies should consider how a number of solutions can be achieved, to meet the identified rural challenges identified in rural areas across Wales. These include how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these recognised issues / challenges.

In light of the below, and considering the proposed mixed-use development at this candidate site, the development would unequivocally meet the aspirations of Policy 4 set out above, to create a new sustainable community through the extension of Abergavenny, whilst also supporting the needs of the existing adjacent residents / residential areas and other uses. The proposal seeks to implement key elements within the scheme to achieve the solutions outlined above, through the formation of an age balanced community, provision of affordable and market housing, creation of employment opportunities and local services and introduction / improvement in local public transport services.

Therefore, the proposal represents an excellent opportunity to sustainably extend the existing settlement of the rural town of Abergavenny, whilst providing high-quality market and affordable homes, office space provision, SUDs, new services and the introduction of new local public transport services.

### *Policy 5 – Supporting the Rural Economy*

In order to support and establish 'vibrant rural areas', the Plan sets out that the Welsh Government supports "*sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans.*" It is considered as a necessity to plan positively to meet the employment needs of rural areas, in order to ensure that these towns can and remain viable whereby they represent economic and environmentally sustainable settlements i.e., reduce out-commuting and increase employment opportunities in the locality.

Given that the proposed use of the site seeks to incorporate a mix of uses comprising office space (B1) and a small convenience store (A1), a number of employment opportunities will be created for the future residents of the proposed settlement, as well as for the existing residents located in Abergavenny. This, in turn, will enhance the viability, vitality and attractiveness of Abergavenny as a place to live and work, and help to meet the identified current and future needs of the County. As outlined within Future Wales, it is important that rural communities develop strong economies and support local enterprise – which can reduce the need for workers to travel long distances and reduce the reliance on larger economic centres e.g. Newport, Cardiff and Bristol. Therefore, the proposed development at this candidate site will undoubtedly comply with Policy 5 of Future Wales, and will have a significant positive impact on the local economy.

### *Policy 7 – Delivering Affordable Homes*

Finally, the Welsh Government outlines the key requirement to deliver affordable homes within the plan period, and have confirmed that funding for these homes will be effectively allocated and utilised to ensure targets are met. The housing need estimates undertaken to inform the Plan, have indicated that the provision of affordable homes should become a key focus for housing delivery. Over the next five years (2019-20 – 2023-24), under the central estimate, it is estimated that on average, the annual additional homes are split almost equally between affordable housing and market housing. This represents an average of approximately 3,500 (48%) affordable homes and 3,900 (52%) market homes per year over the five year period.

As set out within the proposed use of the site, the development will incorporate a provision of 35% affordable housing, which equates to the delivery of 226 affordable homes within the scheme. The phasing of this affordable housing delivery is set out below in the proceeding sections, which confirm the site promoter's intentions to provide this level of provision, and subsequently, play an important role in contributing to the overall aforementioned figure outlined within Future Wales. Therefore, the proposed development represents an excellent opportunity to contribute to affordable housing provision, not only in Monmouthshire, but also in Wales.

## 5.2 – PHYSICAL CONSTRAINTS (Q3.b)

There are a number of physical constraints present within and adjacent to the site, as identified within the reports accompanying this submission, which require consideration / review. These are outlined below, and are also conveyed within the 'Placemaking Booklet' noted as 'weaknesses' to the site. Notwithstanding these constraints, the Reports submitted in accordance with this candidate site submission, have confirmed that with appropriate mitigation / enhancement measures, these constraints create opportunities, and can be overcome to ensure that the proposed mixed-use development is both acceptable and deliverable. These constraints are briefly outlined below, and have been discussed further in other proceeding sections within this Prospectus.

### *Movement and Travel*

The existing rail line and A465 abutting the boundary of the candidate site create a barrier physical separating the existing settlement of Abergavenny, to the proposed urban extension. In order to 'unlock' this land as opportunity to accommodate the proposed mixed-use, investment in and upgrading to infrastructure is required to improve pedestrian, cycle and public transport connectivity, to ensure that the extensions is both sustainable and logical. The site promoter is committed to unlocking this site for development, and it is proposed that improvements to the existing infrastructure will be undertaken to overcome this physical separation between the site and the town of Abergavenny.

### *Landscape and GI Sensitivity*

The site is considered to be a sensitive location – given that is currently a greenfield site and due to its topography, it can be seen from a number of vantage points across Abergavenny (illustrated below) – and therefore, any development will have a visual impact upon the site and its surrounding landscape. Notwithstanding this, a sensitive design approach has been taken, including the implementation of low density housing / woodland hub in the most sensitive areas of the site, to ensure that the development does not have a detrimental impact upon the site's sensitivity and its surrounding landscape. In accordance with this sensitive design, appropriate and suitable landscape mitigation will be incorporated into the design / layout of the development to soften the proposal, and enhance the existing Green Infrastructure within the site.

### *Noise*

Given the site's location immediately adjacent to the railway station and A465, noise is generated from these uses which could have an impact on future occupiers of the proposed development. As shown below, a Noise Assessment has been carried out to assess the potential noise impacts on the proposed development, as a result of the baseline conditions. The site layout has been carefully considered to ensure that sensitive receptors i.e. residential uses, are sited outside of any NEC C or D area, and that appropriate mixed uses will be situated closer to the A465 and rail station, whereby a buffer will be implemented. Therefore, this physical constraint has been accounted for within the proposed development and is considered to not have any detrimental impact upon future residents within the candidate site boundary.

### *Phosphate*

In January 2021, Natural Resources Wales (NRW) published guidance outlining improvements need to be made to phosphate disposal in 'Special areas of Consideration (SAC's), with a series of measures / recommendations made to address phosphorous target failures in protected waterways. The site lies within the Phosphate catchment of the River Usk and as such, special consideration is required to determine how phosphates from the site can be disposed sufficiently and appropriately. The accompanying Drainage Report has outlined that the proposed development will be able to achieve phosphate neutrality, and further detail regarding this is provided in the proceeding sections.

## **5.3 – TOPOGRAPHY / GROUND CONDITIONS (Q3.c)**

### **5.3a – Topography**

Corner Point Surveys Ltd were commissioned by MHA to obtain Lidar Data to inform the topography of the site, and to also provide context of the existing levels to key consultants supporting the submission of the candidate site. The site slopes upwards to the east towards Skirrid Fach, with more levelled areas of land to the east abutting the A465. This has been evidenced out through the submission, whereby the proposed uses and layout of the development has been carefully considered in light of the existing topographical features.

### **5.3b – Ground Conditions**

Integral Geotechnique were appointed by the site promoter to undertake a geoenvironmental and geotechnical desk study of the site, to assess the existing ground conditions of the land within the site promotion boundary. A report has been prepared and submitted in accordance with the candidate site submission, which encompasses the findings of the desk study undertaken, and guidance on the scope of the investigation work.

The Desk Study undertaken confirmed that the site has remained as undeveloped fields utilised as agricultural land. There has been farm buildings present within the site over the years which have been reconfigured and/or demolished. Roc House Farm was constructed within the western area of the site by the 1990's. The study also confirmed that there are no issues relating to Geology, Radon, Hydrogeology, Hydrology and flooding within the site. Moreover, the report outlines there are no current or historical landfills present within 500m of the site.

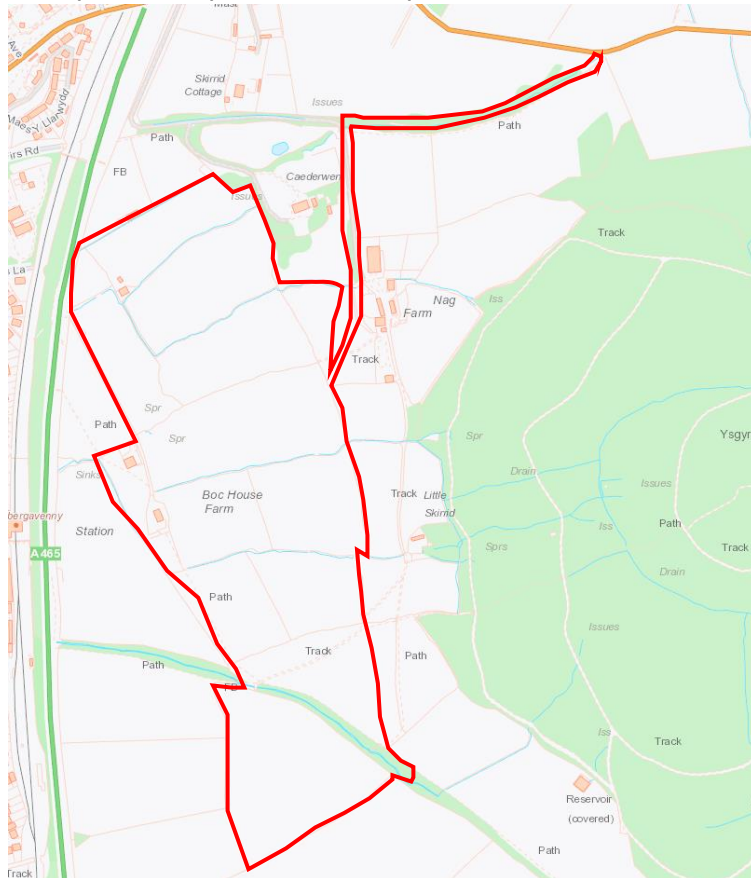
#### **5.4 - LEGAL CONSTRAINTS (Q3.d)**

There are no existing Legal Covenants / Constraints tied in within the landownership of the site, that would constrain the site's suitability for development.

## 5.5 - FLOOD RISK (Q3.e)

### 5.5a – Flood Risk

A review of the NRW's Development Advice Map confirms that the site is within Flood Zone A (at little or no risk) with low flood risk from rivers, sea and small watercourses. The map also demonstrates that the development will not increase the risk of flooding elsewhere. It is noted that there are limited issues within proximity to streams, however, these shall pose no threat to the proposed mixed-use development and future occupiers. Therefore, overall, the proposed development complies with the requirements of TAN 15 'Development and Flood Risk' to locate development away from areas at risk of flooding.



NRW Development Advice Map

### 5.5b – Drainage Strategy

Quad Consult have prepared a Drainage Strategy Report in support of this candidate site submission to demonstrate that a robust surface and foul water drainage strategy can be implemented at the site to service the proposed strategic development.

#### *Surface Water*

It is proposed for surface water runoff destination, discharge will be directed to surface water bodies whereby any runoff from the SuDS features from the proposed mixed-use development will be attenuated within the pond and discharged to the local watercourses located throughout the site.

In terms of hydraulic control, for primary treatment and conveyance, roof runoff from properties will be captured by Bioretention areas or Raised Planters and private parking of permeable paving, capturing, attenuating, and treating flows initially. The flow through these features will be designed to capture the first 5mm flush as required. For secondary treatment and conveyance, swales with connecting pipework sections will capture road runoff and overflows from primary systems at each property. These will generally fall to the west of the development and conveying flows to a series of attenuation ponds offsite to the west. The final tertiary stage will capture the runoff from all storm events up to the 100-year return period + 40% climate change factor within the attenuation pond, treating and attenuating flows before discharging to the existing watercourses.

Runoff from residential developments and associated highways is generally viewed as low to very low risk and the proposed site layout provides the opportunity to introduce SuDS into the scheme to reduce potential contaminant risk further. The proposed development incorporate various SuDS features throughout the site. it is proposed that the roof areas are taken into planters where practical and thereafter into swales along with the remaining surface water runoff, conveying flows and cascading into the attenuation pond which provides an opportunity for planting and gardening within the development.

Moreover, the proposed SuDS features and associated planting, will provide habitat for wildlife, and in turn, soften the impact of the new development whilst retaining and complimenting the existing march and woodland ecology.

#### *Foul Water*

Following early discussions with DCWW, there are three options for consideration for the foul water discharge location, and these are outlined below:

##### Option A

It is proposed that a foul water sewer is requisitioned through the western boundary of the adjacent land, next to the A465, with the sewer running underneath the main highway and utilising an existing underpass below the rail line. It would be proposed to discharge the four water flow within an existing DCWW sewer located in Ffordd Gobannium street – whereby the existing sewer would be subject to a Hydraulic Modelling Assessment (HMA) with infrastructure upsized to accommodate proposed flows.

### Option B

It would be proposed to construct a foul water pumping station at the low point of the development with a gravity sewerage system serving the site. The proposed foul water flow would be pumped to the north of the site to the existing DCWW sewer located adjacent to the B4233 bridge crossing the A465. The existing sewer is subject to a HMA with infrastructure to be upsized to accommodate proposed flows.

### Option C

It would be proposed, subject to discussions with national rail, to discharge foul water flow via a gravity system to the existing DCWW sewer located adjacent to the railway station. This route would cross the A465 and train line, and would be subject to a HMA with infrastructure to be upsized to accommodate proposed flows.

In conclusion, it has been established that there are no technical issues preventing the development of the site which could not be addressed through normal design practices.

## 5.6 – NEIGHBOURING USES (Q3.f-Q3.g)

With regards to possible conflicting neighbouring uses near the site, there are not considered to be any conflicting uses or activities that would unduly constrain the proposed development. Given the site's proximity to the A465 and A40 and the adjacent railway line, Air Quality and Noise are key material planning considerations, and have been assessed and submitted in accordance with this candidate site submission. These level of assessment works are discussed in greater detail below, both of which demonstrate the site's acceptability to accommodate a mixed-use scheme that will result in modest and acceptable levels of impact on existing noise and air quality conditions in the locality.

### 5.6a – Air Quality

In order to support the candidate site submission, Air Quality Consultants Ltd were commissioned to review and provide a high-level assessment of the baseline air quality information for the area surrounding the proposed site, and to undertake a qualitative assessment of the potential effects of the proposed development. The assessment was carried out to identify any potential air quality constraints to the development of the site for the proposed uses and the potential for significant air quality effects in the surrounding area.

In terms of the baseline conditions of the site and its surroundings, based on local monitoring data, air quality at the proposed development is likely to be good; concentrations of nitrogen dioxide are below the relevant objectives adjacent to roads which experience higher traffic volumes than the A465 adjacent to the proposed development. Therefore, it is considered that the air quality for future residents will be acceptable. The site itself does not sit within any Air Quality Management Area (AQMA), given that both AQMA's in the County are located over 14km away from the site, and as such, do not present any constraints.

The submitted Report confirms that during construction of the proposed development, dust will be generated. With appropriate mitigation in place - which would be implemented through conditional requirements imposed on any planning permission – construction dust impacts will not be significant on nearby residential receptors identified west and east of the site.

It is acknowledged that the proposed development will generate additional traffic on the local road network, given the number of dwellings proposed for allocation, and as such, the impact upon air quality at existing residential properties has been considered. Taking into account of the existing good air quality in the vicinity of the site, and the likely volume of traffic generated as a result of the proposed development, the Report has outlined that impacts at nearby existing residential and ecological sites are unlikely to have a significant effect.

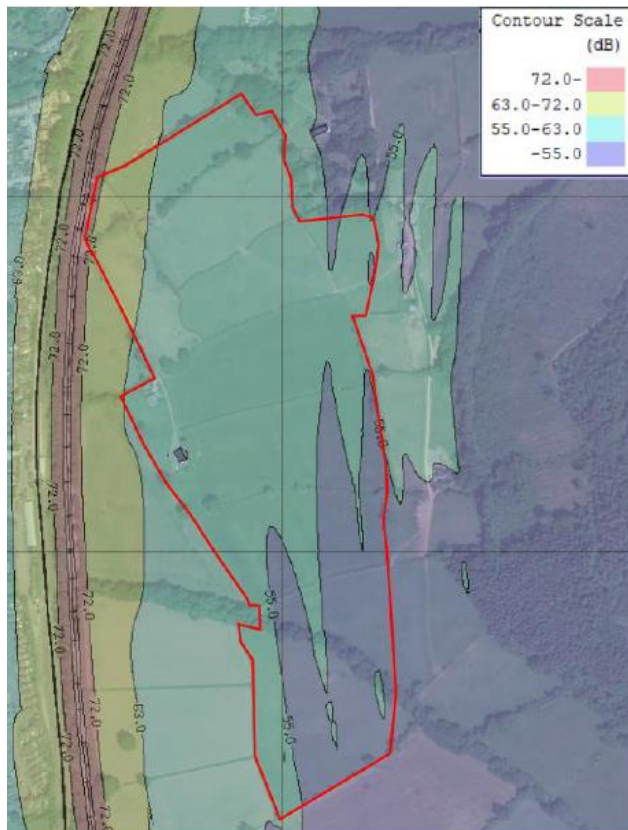
Therefore, in summary, the findings and recommendations of the assessment and Report undertaken and prepared by Air Quality Consultants Ltd, eloquently confirm the site's suitability for allocation to accommodate a proposed mixed-use development in terms of its impact on local air quality.

### 5.6b – Noise

Hunter Acoustics were commissioned by the site promoter, Monmouthshire Housing Association, to undertake an assessment of the existing ambient and background noise levels impinging on the site from local sources, in particular, the adjacent A465 and railway line.

In short, the assessment found that road traffic noise generated from the adjacent A465 controlled the ambient and background climate both daytime and night-time, and that rail noise was not found to be significant.

A noise model has been included within the accompanying report, and its extract is provided below, which illustrates the predicted road traffic noise levels during the critical daytime period (0700-2300hrs) at 1.5m above local ground level across the candidate site.



Extract of Daytime Model

As shown in the above extract, the majority of the site is indicated to fall under NEC B of TAN 11, with the exception of the western boundary which falls under NEC C of TAN11, with a small proportion of the north-eastern boundary falling under NEC D. It must be noted that there are no proposed 'sensitive receptors' to be sited within areas shown above falling within NEC C or NEC D, and the observed noise levels have informed the overall site layout of the proposed development.

Whilst the report acknowledges that, dwellings that will be sited the closest will require additional noise mitigation, these measures can be readily accommodate and does not represent to be a significant constraint to developing the site. The accompanying report expands upon the likely mitigation measures to be implemented to minimise potential noise impacts within the site, and these will be discussed and proposed through any formal planning application in due course.

An updated noise map model and assessment of noise mitigation measures, including requirements for external building fabric elements, is to be carried out at a subsequent later stage once the design / site layout of the proposed development is advanced further.

## 5.7 – CONTAMINATION (Q3.h)

As forementioned, Integral Geotechnique were commissioned to undertake a geoenvironmental and geotechnical desk study of the site, to determine whether any existing contaminants are present within the site, and what further works are required to support the proposed development.

In terms of the previous uses of the site, the desk study found that fertilizers, pesticides and herbicides are present within the land, as a result of the use of the site as farmland. Given this, the existing site use would not cause any additional contamination issues, due to the site currently used for a variety of agricultural uses including grazing and harvesting. The adjacent site uses also do not contain any significant contaminants.

The principal geoenvironmental and geotechnical issues outlined within the report that need to be addressed are as follows:

- Foundation strata – level, strength, compressibility and chemical characteristics.
- Presence or absence of shrinkable clays.
- Soil infiltration characteristics.
- The extent of any ground contamination, including asbestos in the ground.
- The potential for ground gas to be present beneath the site.

Notwithstanding the above desk study findings of likely contaminants within the site, a comprehensive intrusive site investigation would be required, over the entire site, in order to facilitate a detailed technical and financial appraisal. This would enable the foundation and hardstanding design for the proposed development to be developed using specific data on the ground conditions.

## 5.8 – ECOLOGY / BIODIVERSITY (Q3.i-Q3.k)

In line with Monmouthshire County Council's Second Call for Candidate Site requirements for any submission to be accompanied with baseline ecological information, Soltys Brewster Ecology were commissioned by the Site Promoter, Monmouthshire Housing Association, to undertake a preliminary appraisal of the site in question. The ecological baseline conditions at the candidate site were established in October 2020 through a combination of desk study and Extended Phase 1 Habitat Survey.

The scope of the survey conducted included land / areas outside of the candidate site boundary (within adjacent promoting land), as a result of a land parcels being removed from the second submission boundary. Nevertheless, the survey undertaken and submitted forming part of this allocation submission is robust and sound, going over and above the promoting area, and clearly evidences the existing ecological baseline conditions of the site and its immediate adjacent areas.

The report presents the findings of the desk study and Extended Phase 1 Habitat survey undertaken at the site between March and October 2020 – whereby the report describes the existing ecological conditions of the site as well as identifying any potential ecological constraints/opportunities associated with the site.

### 5.8a - Desk Study

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 site.

The desk study also returned an extensive list of records for protected fauna and flora within 2km of the candidate site – which included the identification of a number of bat roosts within 150m of the candidate site boundary as well as over 250 individual records of foraging and commuting bats within the 2km search radius. The data search undertaken included records of Great Crested Newts (GCN) within 2km of the site boundary with 2no. 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 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 close proximity to the candidate site.

### 5.8b – Extended Phase 1 Habitat Survey

An Extended Phase 1 Habitat survey undertaken in October 2020 identified a range of habitats present at the site including improved grassland, arable field, poor semi-improved grassland, broad-leaved woodland, mixed plantation woodland, dense scrub, tall ruderal, spoil, running water, dry ditches and an extensive hedgerow network. The survey did not find any evidence of invasive plant species within the site.

During the survey, a main Badger sett was discovered, located within the woodland corridor towards the southern extent of the site. Other evidence of the use of the site by Badger was found across the site including mammal paths, footprints, guard hairs and the discovery of a disused outlier sett.

The linear habitat features observed 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.

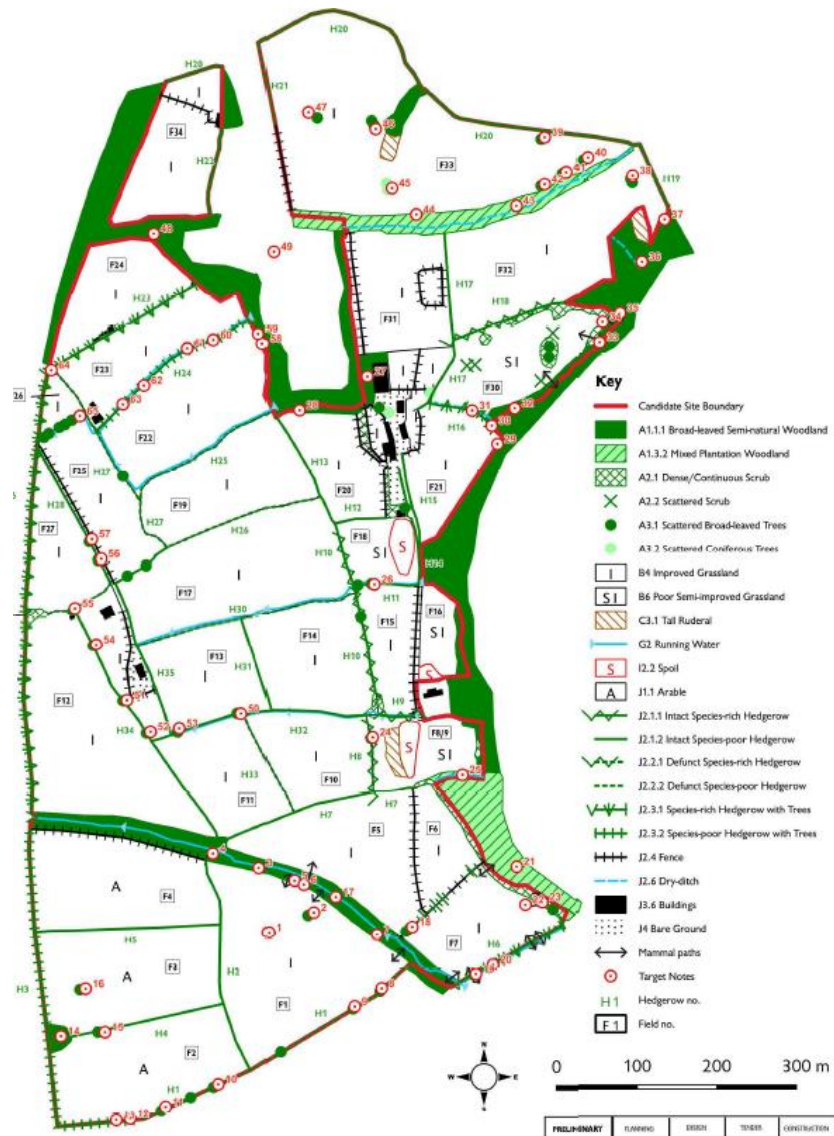
The site contains a number of mature/veteran trees and buildings assessed to have a high, moderate and low potential to support roosting bats and possible suitability to supporting nesting Barn Owl. The habitats at the site was also considered likely to support nesting and foraging birds with the open areas of improved grassland and arable field also considered suitable to support ground-nesting birds such as Skylark.

The extensive hedgerow network, which contains a number of species-rich hedges, 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) are unsuitable for reptiles the poor semi-improved grassland fields located along the site's eastern boundary 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, there are two existing ponds located at Caerdewen Farm (immediately offsite) and Green Acres Farm (250m north). 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 will be undertaken to support a subsequent planning application to bring forward the mixed-use development at the site, to inform any specific mitigation or licencing requirements with regards to Bats, Badger, Barn Owl, Great Crested Newt, Hazer Dormouse and reptiles.

An illustrative map showing the forementioned findings of the Extended Phase 1 Habitat Survey has been produced – which collates and identifies all of the Ecological features of the site. This is provided overleaf:



Extended Phase 1 Habitat Survey Map

### 5.8c – Assessment of Ecological Appraisal

Notwithstanding the above findings of the Ecological Appraisal undertaken at the site, it is considered that development here within the proposed extension to Abergavenny, presents opportunities for both strategic and local biodiversity enhancement. It was found that the large, improved grassland fields are 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.

As part of a strategic green infrastructure network to be incorporated within the strategic mixed-use development, hedgerows and trees should and will be retained as part of the development layout. This will result in a betterment of the existing ecological conditions observed at the site and ensure that all extensive ecological features are preserved and where possible, enhanced to increase biodiversity. In particular, the Ecological Appraisal outlines that defunct hedgerow boundaries could be strengthened with new native tree and shrub planting – which would improve connectivity for foraging and commuting bats and other mobile species.

Therefore, the Ecological Appraisal undertaken and prepared in accordance with this candidate site submission evidencing, and demonstrating the site's acceptability, from an ecological and biodiversity perspective.

## 5.9 – PHOSPHATE (Q3.I)

In January 2021 Natural Resources Wales (NRW) published guidance outlining improvements to be made to phosphate disposal in 'Special areas of Consideration (SAC's), with a series of measures / recommendations made to address phosphorous target failures in protected waterways.

The candidate site that lies east of the A465, lies within the Phosphate Catchment area of the River Usk. The land is currently used for pasture purposes (animal waste, fertilisers) with unrestricted surface water runoff. As outlined in the above sections, post development surface water will be captured and treated within a series of sustainable urban drainage features, with surface water runoff restricted to Qbar greenfield rates, treating and attenuating surface water volumes on site for storms up to and including the 100 year (+40%), thus providing a significant betterment to the existing phosphate pollution flows to the receiving watercourse.

Following a review undertaken of site topography and likely foul water strategy, it would appear that the surrounding DCWW public sewerage infrastructure conveys to the existing Llanfoist water treatment plant that is located south of the River Usk. It is considered that although this treatment plant does not currently benefit from phosphorous stripping technology, and that any works are not to be included within AMP7, the existing treatment plant would benefit strongly in being allocated as part of the AMP8 DCWW investment programme to enable phosphates to be adequately treated. It is therefore deemed important that a strategy is developed to remove phosphates from the foul water generated by the development from a number of sources. Measures to be considered for discussions with the relevant bodies include:

- Upgrading the local water treatment plant to include facilities for phosphate removal, if not included within AMP8 programme.
- Inclusion of onsite processing plant to remove phosphates at source, either on plot or at a strategic, site wide level.
- Inclusion of wetland habitat that aids the natural filtration/treatment of phosphates with reed bed systems OR similar. All offsite solutions are being explored with CHC and other stakeholders to encourage the adoption of a phosphorous 'credit' system to enable development ahead of any upgrade works to the local water treatment plant.

With consideration given to the timescales associated with the AMP8 improvement works (2026 or later), a strategy is provided to enable site progression at an earlier date. This is to include individual package treatment works to larger houses within earlier phases (commencing 2025, ending 2033), which shall allow foul water to be treated and construction to progress prior to any AMP8 works. Any remaining phases are to be kept fallow to reduce the impact of SW runoff and impact from subsequent phosphates from sources such as fertilisers / animal waste.

In summary, it is considered that the development shall be able to achieve phosphate neutrality through the joint coordination of water / local authorities to implement adequate measures to remove any potential phosphates over and above the allowable limit.

### 5.10 – AGRICULTURAL LAND CLASSIFICATION (Q3.m)

An 'Agricultural Considerations' report has been carried out by Kernon Countryside Consultants in order to assess the agricultural circumstances and the implications of the proposals, which included a detailed Agricultural Land Classification analysis.

PPW11 sets out in paragraph 3.59 that the best and most versatile agricultural land (BMV), defined as land within MAFF Agricultural Land Classification (ALC) Grades 1, 2 and 3a, should be afforded considerable weight in the planning balance. The guidance outlines that development of such land is not prohibited, and if it is deemed necessary, poorer quality land should be used in preference.

The Welsh Government's Predictive ALC maps (version 2, 2020) illustrate that most of the site is predicted to fall into Subgrade 3b 'moderate' quality. Only part of the site predicted to be of Subgrade 3a 'good' quality. The accompanying 'Guidance Note' (v2.1, 2021) explains that where land is shown as potentially of BMV quality, detailed survey is required.

Therefore, a detailed ALC survey has been carried out for that part of the site potentially of BMV quality. The survey was carried out in July and August 2021, and identified that the site is a mixture of land quality, but mostly Subgrade 3b 'moderate' quality. In the north there is an area of Grade 2 'very good' quality, and there are three areas of Subgrade 3a 'good' quality in total covering 4.2 ha, but in smaller patches.

Combining the field survey result with the predictive ALC, the land quality of the site is shown in the table and map presented overleaf.



Agricultural Land Classification Map of Site

| ALC Grade                   | Area (ha) | Proportion (%) |
|-----------------------------|-----------|----------------|
| 2 Good Quality              | 3.6       | 15             |
| 3a Good to Moderate Quality | 4.2       | 17             |
| 3b Moderate Quality         | 16.6      | 67             |
| Urban                       | 0.3       | 1              |
| Total                       | 24.7      | 100            |

Therefore, based on the results collected and as shown in the above ALC map, it can be considered that whilst the site contains BMV land (3.6ha), within the northern portion of the site, the land here is mixed in with the moderate quality land and would therefore, be very difficult to farm separately. As such, the loss of the land would be considered acceptable in any event, and does not pose a threat / restriction to development here.

### 5.11 – LANDSCAPE (Q3.n)

In order to inform and support this candidate site submission, MHP Design Ltd were instructed to undertake a strategic Landscape and Visual review of the land east of Abergavenny. The review assessed the proposed development in terms of its potential impact upon the landscape character and visual amenity of the surrounding area. The review provides an overview of the key landscape and visual sensitivities of the site to guide the design approach as part of its promotion.

Due to the size of the site, it falls within and across a number of LANDMAP aspect areas. Aspect areas values for A19, which forms most of the study site and the whole of Little Skirrid hill, are stated below and provide a general overview of the LANDMAP ratings:

- Geological Landscapes – High
- Landscape Habitats – Moderate
- Historical Landscapes – Moderate
- Cultural Landscapes – Outstanding
- Visual and Sensory – High
- Visual and Sensory Sensitivity – High

The main findings and conclusions of the review are set out below:

- The Monmouthshire landscape Sensitivity and Capacity Study assessment identifies the following sensitivities which relate to the three land parcels (A03, A18 & A19) part of which the study site covers.
  - The sensitivity of the area is high/medium because it is separated from Abergavenny by the A465 and railway line.
  - The sensitivity of Little Skirrid, including the central portion of the study site is high because it is a prominent and distinct hill which acts as a distinct backcloth to Abergavenny with views from Castle Meadows.
  - The site is within a Special Landscape Area (SLA).
- The landscape character of the site and its sensitivities are borne partly from its current undeveloped nature and its rising landform - however, despite this being a rural landscape, urbanising features and settlement features are within close proximity. These urbanising features of the town have greatest influence over the western portion of the site where the lower and more gently sloping fields are within proximity of the A465 highway and mainline railway.
- The stream corridors of the site, situated to the north and south, are prominent landscape features which create physical, visual and logical division of the land parcels within the site.
- The site is generally quite open and upper parts of the sloping site is available in views due to its elevation in relation to the town. The treed highways corridor associated with the A456 to the west provides containment to the lower portions of the site which is generally obscured from views from longer distances at Castle Meadows Park and along the eastern edge of the town by dense vegetation.
- The higher areas of the site are quite open although the substantial green corridors associated with the watercourses that traverse the site limit and contain views both into and out from the site.

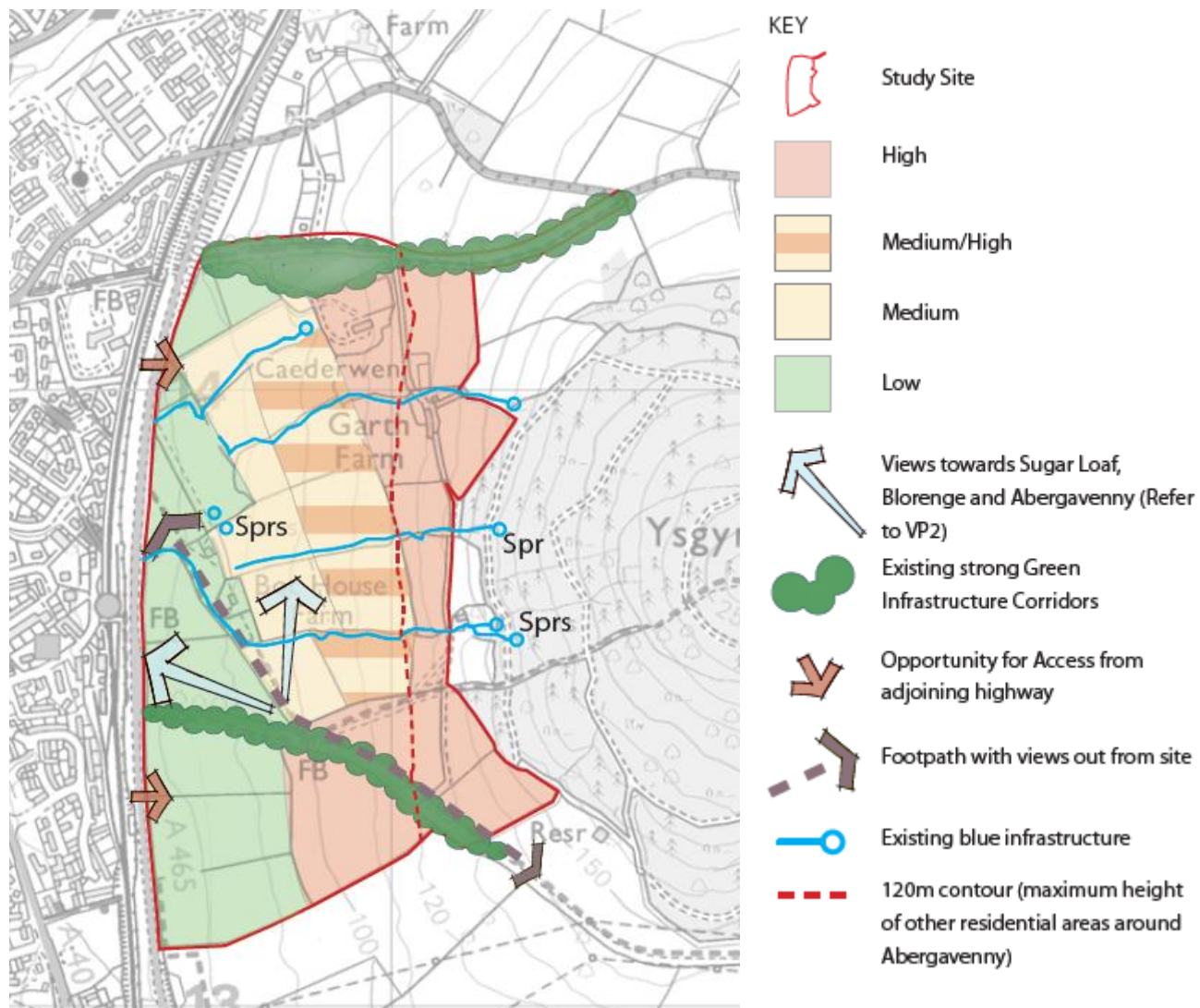
- The availability of local landscape features such as woodland and general tree cover provides characteristic landscape opportunities for enhancement that also provide visual mitigation increasing capacity to accommodate residential development.

Overall, a rating of **Medium** to **Medium-high** has been applied to describe the visual sensitivity to the proposed development. A rating of **Medium** has been applied to describe the landscape sensitivity to the proposed development.

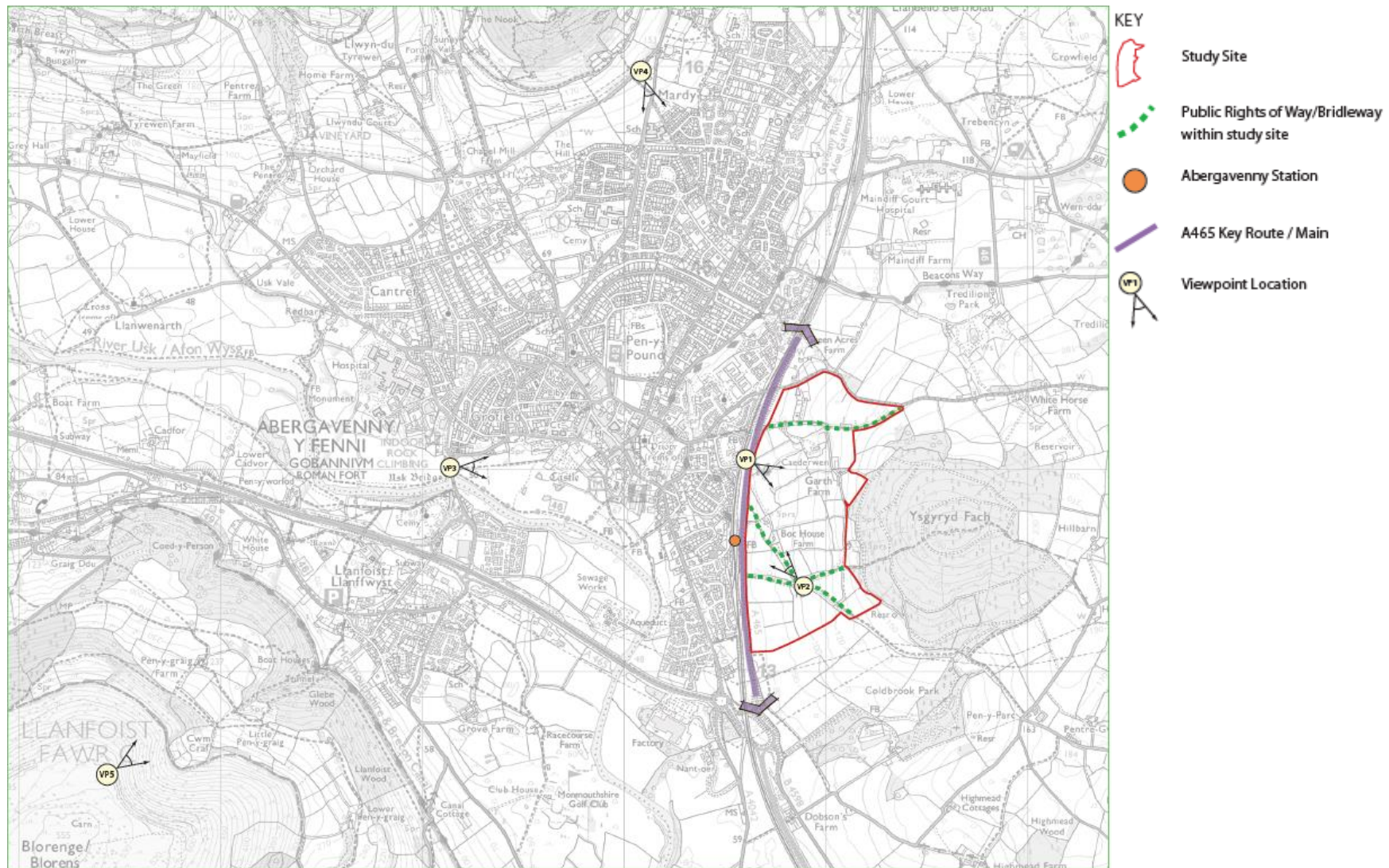
The landscape and visual review concludes that the proposed landscape mitigation measures associated with the development proposals, will allow the site to accommodate the mixed-use strategic development without unacceptable change to local landscape features and the visual amenity of the surrounding environment.

The appraisal therefore demonstrates that the proposals would be acceptable in both landscape and visual amenity terms.

A series of extracts illustrating the above findings and conclusions, are provided overleaf:



Extract of Landscape and Visual Sensitivity Sketch



Site Location, Context, Viewpoint Locations

The above illustrative plan shows a number of viewpoints, by which the site and its context can be viewed from in a number of locations across Abergavenny. To support this submission and illustrate these viewpoints, a number of 'viewpoint photographs' are provided below:



*View Looking East Towards Little Skirrid from Lay-By on A465*



*View Looking North West from Public Right of Way with Candidate Site Towards Abergavenny Town and Sugar Loaf*

Little Skirrid

Viewpoint Photograph 3



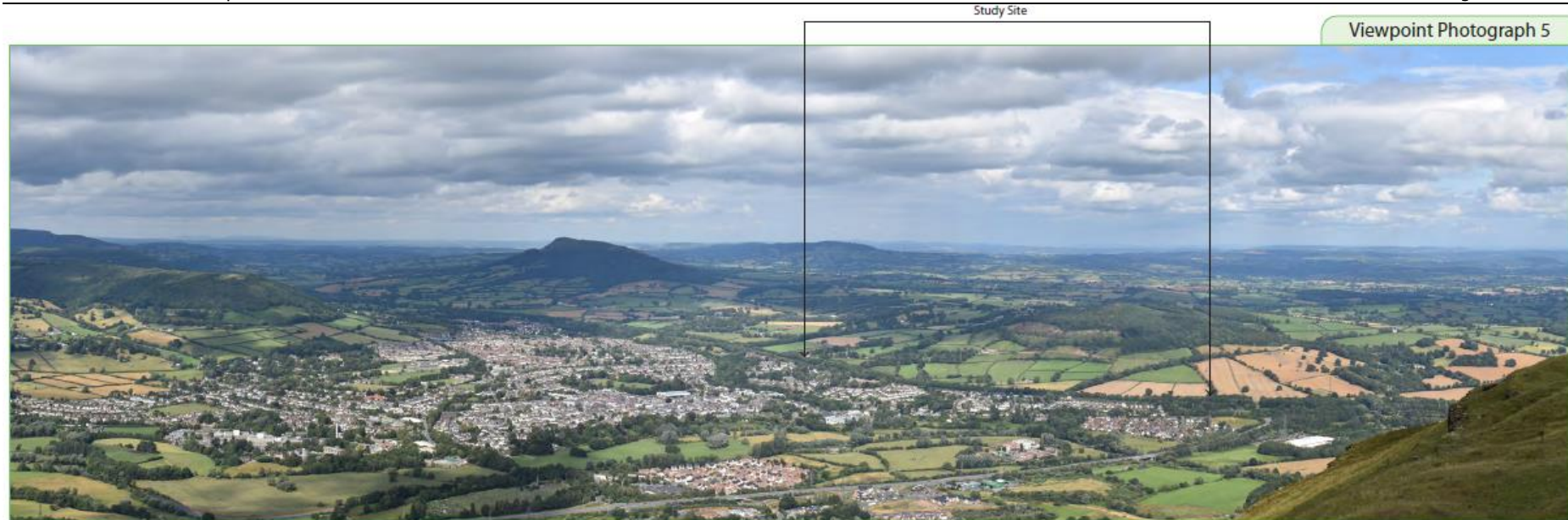
*View Looking East Towards Little Skirrid from Usk Bridge/Castle Meadow*

Study Site

Viewpoint Photograph 4



*View Looking South from Public Right of Way North of Abergavenny Town at Mardy*

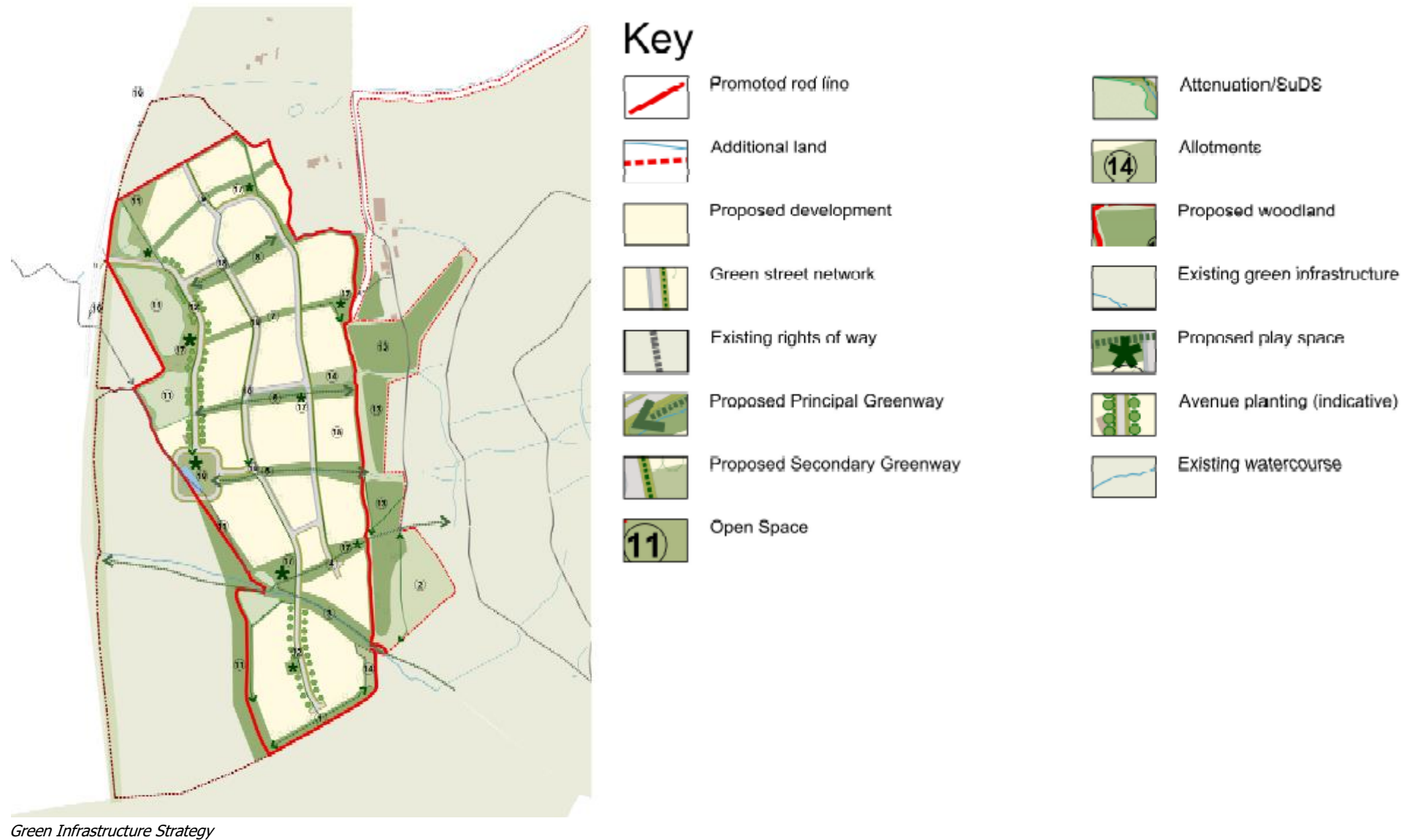


*View Looking North East from Bloreng towards Abergavenny*

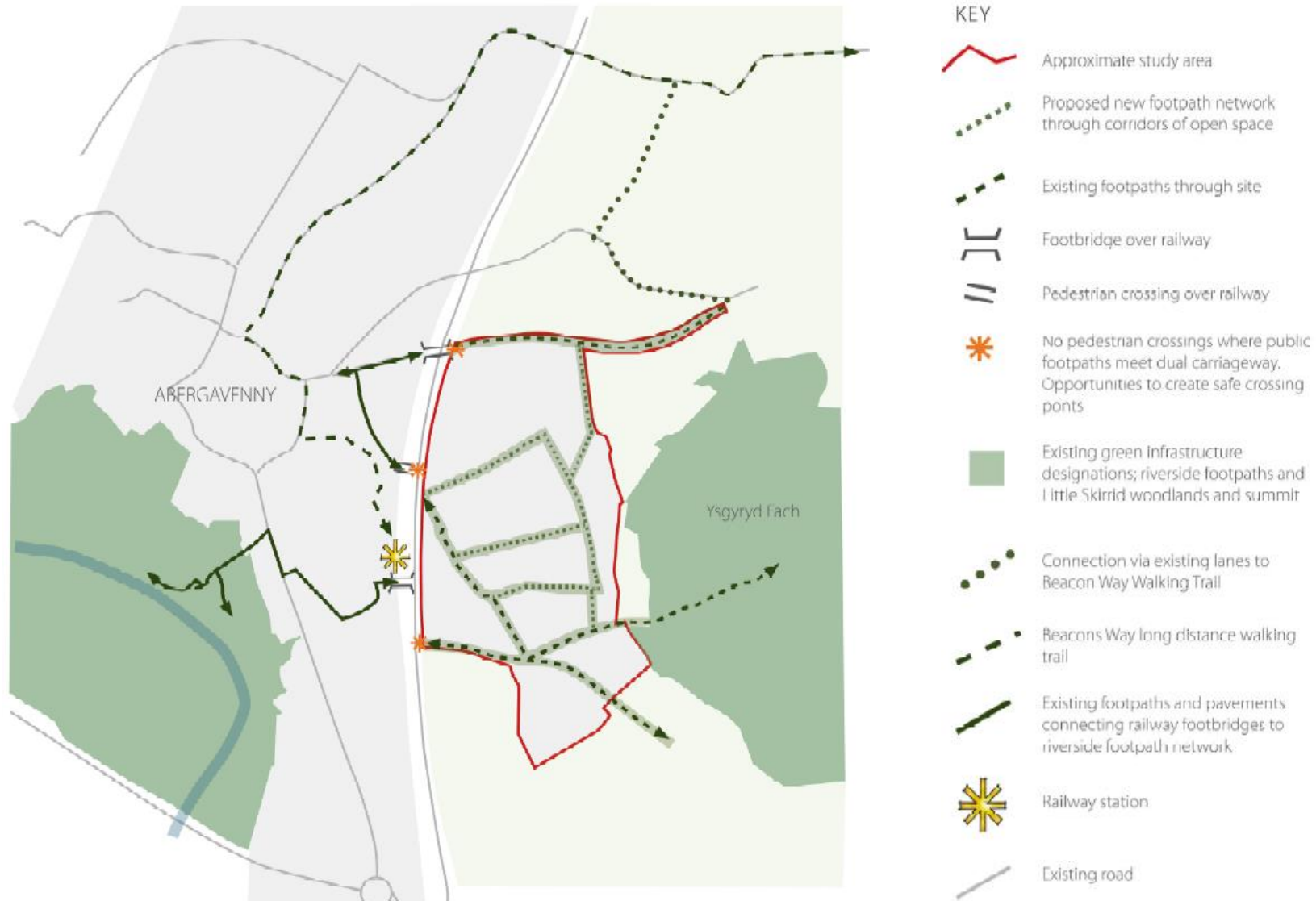
### *Green Infrastructure*

In addition to the above, MHP have also developed a Green Infrastructure Strategy from landscape and visual studies identifying existing landscape features and key views of the site. The strategy aims to protect the existing features and propose new landscape features for both visual mitigation and landscape enhancement. The proposed strategy aims to increase species and habitat diversity, provide high quality recreation and sense of place for new residents, and locate open spaces to divide the site into smaller character areas for local distinctiveness. The strategy covers the following main principles:

- Protect existing trees, hedges and watercourses/ditches.
- Provide new native broadleaf woodland to address climate change, help surface water runoff and provide visual mitigation.
- Provide new areas of wildflower meadows and meadow margins across the site along verges, open space and woodland margins/glades.
- Provide areas for small scale food production such as allotments or community orchards.
- Provide sufficient formal green verges along the main Firs Avenue to allow for large native tree species to frame the new street scene linking to the formal central community green.
- Provide numerous green corridors (greenways) vertically through the site based on existing field hedges and springlines. Proposed Greenways to become species diverse open space for informal recreation, wildlife corridors and tree planting to break the mass of the proposed built form. One large blue corridor (blueway) is proposed horizontally through the lower parts of the site to catch surface run off water and create wetland habitat linking the greenways.







Green Infrastructure Strategy

## 5.12 – LOW/ZERO CARBON / CLIMATE EMERGENCY (Q3.o-Q3.p)

As part of the land framework prepared for this submission, climate change adaptation and resilience measures have been considered and incorporated, to ensure that the proposed mixed-use development will adapt, avoid and mitigate against climate change and meet carbon reduction targets identified in the RLDP.

The Environment (Wales) Act (2016) sets out the requirement to achieve an 80% reduction in carbon emissions by 2050. The Welsh Government have accepted the UK Committee on Climate Change recommendation to increase the decarbonisation target to 2050 from at least 80% to 95%. Following this, the Welsh Government announced in January 2021 a commitment to achieve a Net Zero Wales by 2050 following a recommendation report by the Climate Change Committee.

In May 2019, Monmouthshire County Council declared a Climate Emergency and passed the following motion:

- That the council will ensure it will reduce its own carbon emissions to net zero before the Welsh Government target of 2030.
- That the council will develop a strategy and associated costed action plans to aim to deliver these targets as soon as practicable.
- That the council revise the Corporate plan, Well-being plan, Local development plans and other relevant plans and policies in support of above.
- Publicise the declaration of a climate emergency to residents and businesses in the county and encourage, support and enable them to take their own actions to reduce their carbon emissions in line with a 2030 target.
- Work with partners across the county and other councils and organisations to help develop and implement best practice methods in limiting global warming to less than 1.5 degrees Celsius.

PPW confirms that the planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings – in line with the energy hierarchy below:

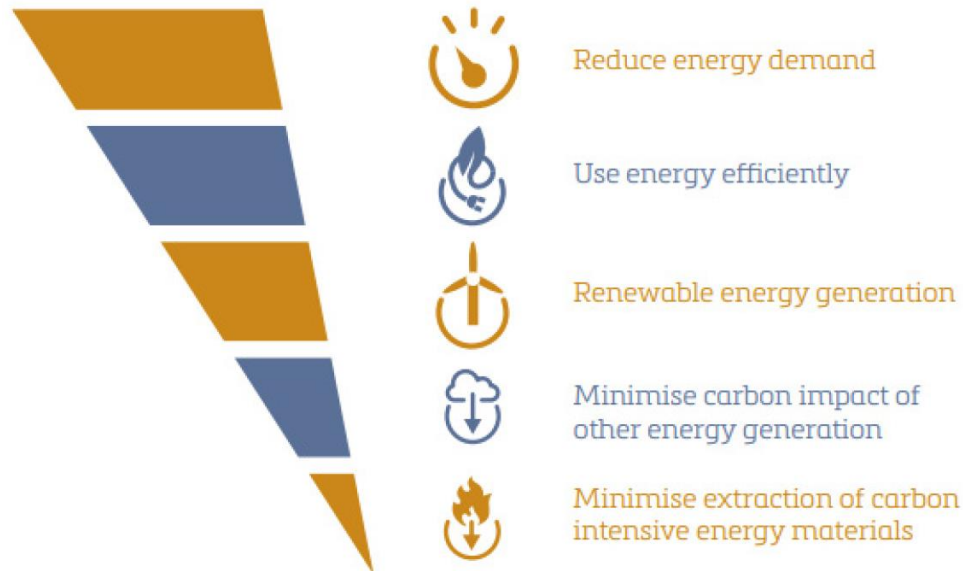


Figure 10: Planning Policy Wales Energy Hierarchy

While developers and contractors cannot necessarily control how people live in the new homes that they build, it is acknowledged that development and house-building can take place using less energy and resources. The site promoters are committed to making all new homes environmentally sustainable to build and to live in.

As set out in the 'Placemaking Booklet', homes within the proposed development will be designed to be energy efficient, complying with Welsh Government Part L and Part F. The site promoter have confirmed their commitment to complying with Part L and Part F, regardless of its adoption (currently expected in 2025) in order to ensure that the development contributes to meeting the identified carbon reduction and climate change measures within its scope. The promoter will work with other developers and contractors involved within the scheme to reduce carbon embodiment and identify MCC solutions that will reduce wastage and materials as possible.

Opportunities identified within the scheme to reduce carbon emissions and lower the cost of living will include promoting southerly facing roofs for solar PV integration, incorporating green bus stops served by electric vehicles and providing space for cycle hire, car share and communal and on plot electric car charging.

Monmouthshire Housing Association are currently working with the Welsh School of Architecture to carry out lifecycle assessments to assess the environmental impacts on many their developments across the County. The lessons learned from these schemes will be brought forward into this proposed strategic development opportunity. Moreover, MHA are committed to reducing usage of energy use on site in order to help tackle fuel poverty and homelessness.

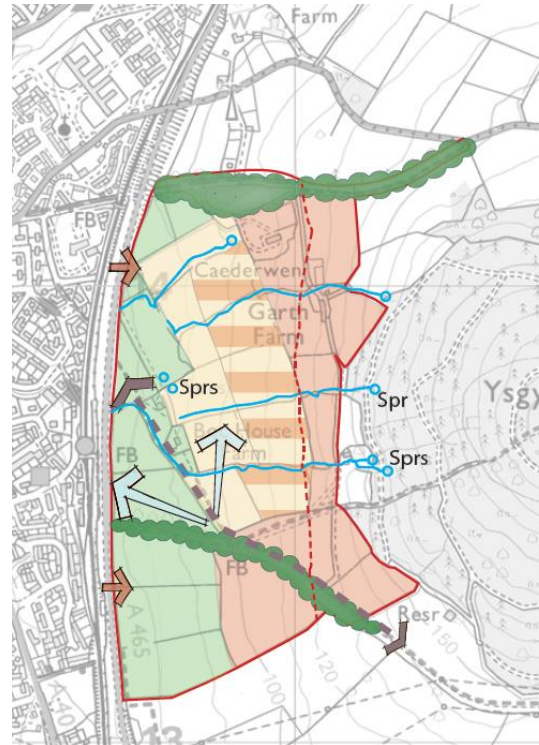
## 5.13 – OTHER KEY CONSTRAINTS (Q3.q)

### 5.13a – Trees

Extensive Green Infrastructure and Arboricultural work have been undertaken to support this Candidate site submission.

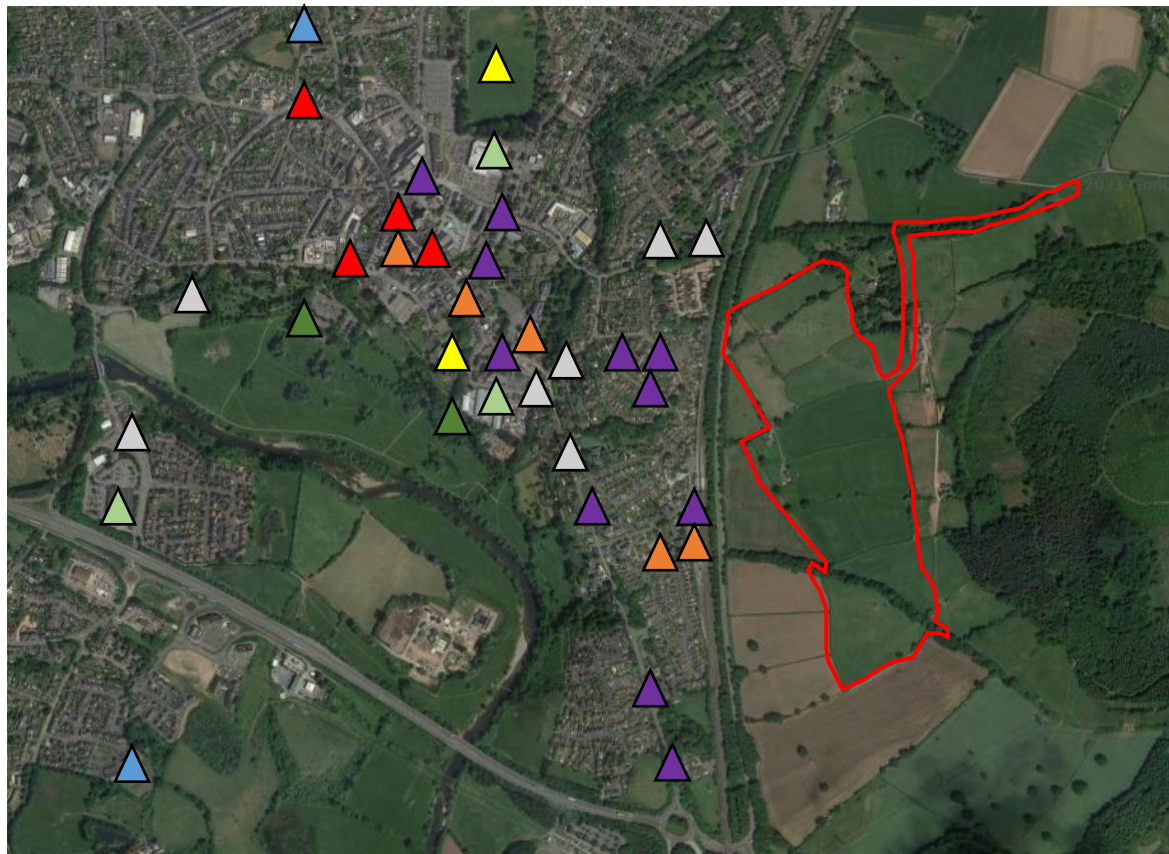
72 individual trees and 7 groups of trees were inspected, and of these, 25 are listed as category A, 33 as category B, and the remainder as category C. Based upon their condition at the time of the survey one tree (T60 – dead Oak) is listed as category U for removal.

An aerial image is provided below which conveys the two main GI / Tree belts (which are proposed for retention and enhancement), but also confirms there are limited to no major trees or specimens located in the heart / centre of the site. Therefore, tree loss will be to a minimum, furthermore, as evidenced through the proposed masterplan, extensive landscaping is proposed and as a result there'll be a net gain of Green Infrastructure on this site.



## 5.14 – LOCAL / COMMUNITY FACILITIES (Q3.r)

The following aerial extracts depict the presence and location of multiple services and facilities in close proximity to the site (outlined in red) as well as a table overleaf outlining the distances to the nearest facilities from the centre of the site:



| Key                                                                                 |                   |                                                                                     |                              |
|-------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------|------------------------------|
|  | Convenience Store |  | Public Transport             |
|  | School            |  | Restaurant/Pub               |
|  | Medical Facility  |  | Leisure / Community Facility |
|  | Hotel / B&B       |  | Park / Garden                |

Map of Local / Community Facilities

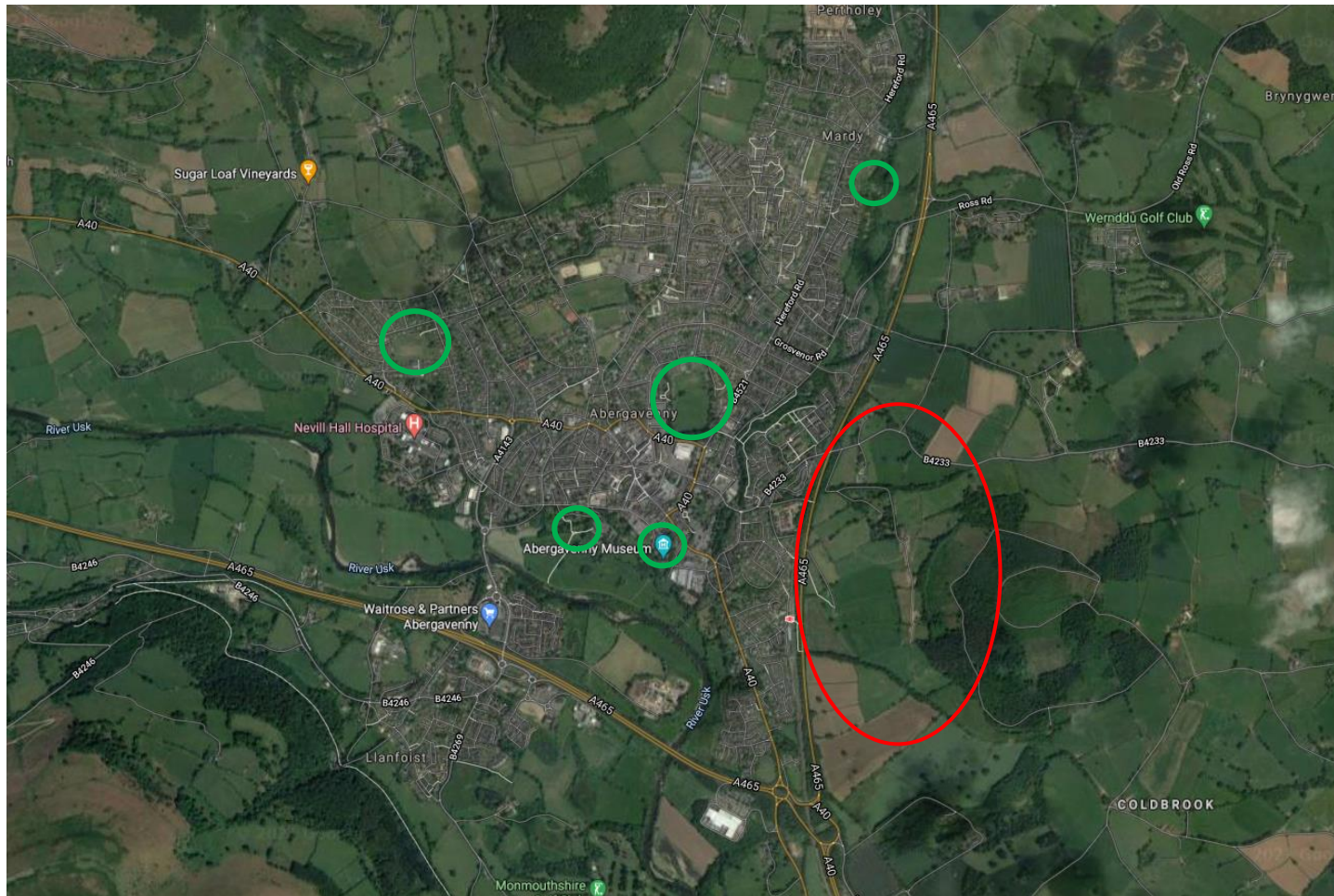
| Local Facility                      | Distance from the centre of the site (metres) | Walking Time (mins) | Cycling Time (mins) |
|-------------------------------------|-----------------------------------------------|---------------------|---------------------|
| <b>Public Transport</b>             |                                               |                     |                     |
| Abergavenny Train Station           | 387                                           | 8                   | 3                   |
| Holywell Crescent Bus Stops         | 420                                           | 7                   | 2                   |
| Abergavenny Bus Station             | 768                                           | 11                  | 4                   |
| A40 Bus Stops                       | 640 / 800                                     | 11 / 15             | 4 / 5               |
| <b>Schools / Education</b>          |                                               |                     |                     |
| Llanfoist Fawr Primary School       | 1860                                          | 42                  | 13                  |
| Our Lady and St Michael's RC School | 1530                                          | 22                  | 8                   |
| <b>Convenience Store</b>            |                                               |                     |                     |
| ALDI                                | 820                                           | 12                  | 4                   |
| Waitrose                            | 1700                                          | 30                  | 9                   |
| Morrisons                           | 1100                                          | 17                  | 6                   |
| <b>Medical Facility</b>             |                                               |                     |                     |
| Boots                               | 1050                                          | 15                  | 5                   |
| Tudor Gate Surgery                  | 1200                                          | 18                  | 7                   |
| H Shackleton Ltd (town centre)      | 1180                                          | 17                  | 6                   |
| H Shackleton Ltd (A40)              | 1500                                          | 21                  | 7                   |
| <b>Hotel / B&amp;B</b>              |                                               |                     |                     |
| Bloreng View B&B                    | 580                                           | 9                   | 3                   |
| Ty Llew B&B                         | 540                                           | 10                  | 3                   |
| The Abergavenny Hotel               | 700                                           | 10                  | 3                   |
| The Courtyard Guesthouse            | 650                                           | 12                  | 4                   |
| The Angel Hotel                     | 980                                           | 14                  | 4                   |
| <b>Restaurant / Pub</b>             |                                               |                     |                     |
| The Great Western                   | 420                                           | 8                   | 3                   |
| La Mediterranea                     | 410                                           | 8                   | 3                   |
| Whistle Stop Café                   | 380                                           | 8                   | 3                   |
| Oasis Snack Bar                     | 770                                           | 11                  | 4                   |
| Cinnamon Tree                       | 900                                           | 13                  | 4                   |

The above map and table evidently show that the site is within proximity to a wide range of services and facilities in Abergavenny, and as such, is well served by existing provision. The majority of these services and facilities are both within walking and cycling distance to the site, demonstrating the proposed development's inherently sustainable location.

The provision of additional facilities, over and above the extensive facilities that existing and are accessible to the site in the wider area and surrounds, will render the development highly accessible and well served, and accordingly highly sustainable.

### 5.15 – AMENITY / OPEN SPACE (Q3.s)

The following plan depicts the proximity of the site to various existing public, green or open spaces, without referencing those which will be provided within the boundary of the site, when developed.



| Key                |                                                                                     |
|--------------------|-------------------------------------------------------------------------------------|
| Recreation Space   |  |
| Rough Site Outline |  |

| No. | Name                        | Description                                                                                                                  | Distance                            |
|-----|-----------------------------|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| 1   | Linda Vista Gardens         | Green space comprising of a maintained garden and children's play area.                                                      | 1.1 miles (foot)<br>3 miles (car)   |
| 2   | Bailey Park                 | Green space (8ha.) comprising sports fields, bowling green, formal and informal garden and a venue for seated public events. | 0.8 miles (foot)<br>2.6 miles (car) |
| 3   | Belgrave Park               | Green space comprising of a children's play area with paths to walk.                                                         | 1.6 miles (foot)<br>3.3 miles (car) |
| 4   | Mardy Park                  | Green Space comprising outdoor space.                                                                                        | 1.5 miles (foot)<br>3.6 miles (car) |
| 5   | Abergavenny Castle & Museum | Green space comprising of outdoor space and castle remains.                                                                  | 0.7 miles (foot)<br>2.1 miles (car) |

*Proximity to public, green or open spaces*

As outlined previously, the site will incorporate new areas of open / amenity space within the layout, for both existing residents in Abergavenny and future occupiers of the proposed development. No existing amenity or open space will be lost as a result of the development.

### 5.16 – CULTURAL / HISTORICAL DESIGNATIONS (Q3.t)

In support of this submission, Archaeology Wales was commissioned by the site promoter to carry out an Archaeological Desk-Based Assessment and site visit to determine the archaeological potential of the site, and whether the proposed development would have any material impacts upon identified assets.

The Report has confirmed that no Registered Historic Landscape, Scheduled Monument, Listed Building or Conservation Area will be directly or indirectly affected by the proposed development. However, the southern boundary of the site borders land designated as part of the essential setting for the Grade II Registered Historic Park and Garden of Colbrook house with the potential to have a minor indirect (visual) impact on its setting. This possible minor impact has been carefully considered within the design process of the development, in terms of its layout and how appropriate mitigation measures can be implemented to ensure that the impact is minimised and acceptable upon its setting. As shown within the plans, significant planting and landscaping is proposed to screen the proposed development upon the adjacent Historic Park and Garden in order to reduce its visibility. In light of this, it is considered that any impact is minimal and therefore, acceptable, as a result of significant landscaping and planting to be implemented to soften the proposal, particularly at its edges along the southern boundary.

There are three sites of potential archaeological interest that are identified within the site area. The first: Kiln Site, Little Skirrid and is considered to be of medium (regional) value. Two other sites of low (local) value have been identified within the research which include the 'Former Farmstead' and outbuildings at Roc House Farm, and the remains of ridge and furrow and lynchets at Roc House Farm. The Report accompanying this submission outlines that, whilst it is expected that the proposed development will potentially impact upon these heritage assets, this impact can be mitigated through the implementation of suitable archaeological mitigation measures and therefore, deeming the site acceptable for allocation.

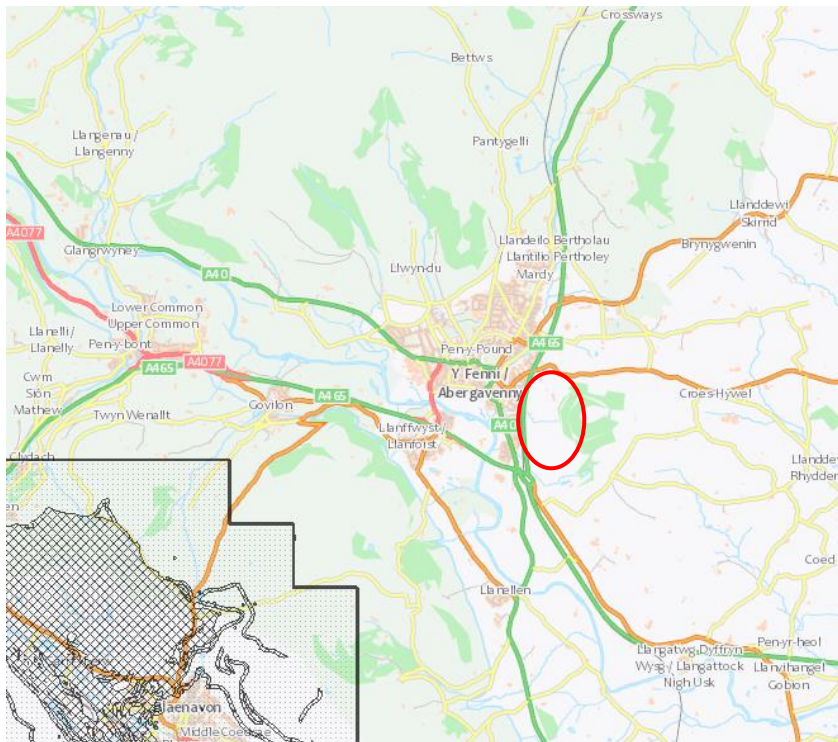
## 5.17 – ADDITIONAL DETAILS (Q3.u)

### 5.17a - Residential Amenity

Taking into consideration the matters discussed above, relating to the site's potential impact on adjacent residential areas including noise, highways, air quality and other factors, the site will not have any detrimental impact upon nearby residents, in any capacity or event. The scheme has been carefully nurtured with these issues and adjacent residents in consideration, to ensure that no harm will be caused to their amenity.

### 5.17b - Coal Mining

A review of The Coal Authority's Map confirms that the site does not lie within a Development High Risk Area, as shown below:



*The Coal Authority Interactive Map*

## 6.0 UTILITIES (Q4)

A Utilities Assessment has been undertaken by M-EC to establish how the proposed development will be serviced with key utility suppliers, whether diversion or protection of existing apparatus may be required, and estimated costs for service connection and diversion works, where available. A summary of the findings for each utility service is provided below:

### *Clean and Foul Water*

A developer enquiry response is currently awaited from Dwr Cymru Welsh Water (DCWW) regarding the budget costs and capacity to supply the development. Early indications are that there are potential capacity limitations within the clean and foul water networks in the vicinity of the proposed development. DCWW have indicated that hydraulic modelling of the sewer and clean water networks is required to confirm available capacity and any reinforcement required. If reinforcement is required it will be funded via the infrastructure charge and there will be no additional cost to the developer. Connection points will be confirmed upon completion of hydraulic modelling.

### *Gas*

Early indications are that there are potential capacity limitations within the gas network in the vicinity of the proposed development. Wales & West Utilities (WWU) have advised that reinforcement may be required to provide sufficient capacity for the new development and an element of any applicable reinforcement costs may be chargeable to the developer but no further details are available at this stage. The nearest gas network is approximately 105m east of the proposed development on the opposite side of the railway and the A465. Network Rail consent will be required for new crossings of the railway which may extend the lead time for new connections

However, it is noted that gas connections will be allowed until circa 2025, and as such, given the proposed deliverability timescales of the site, it is unlikely that gas connections will be used in any event. As a result, and ensuring that the scheme incorporates appropriate and efficient climate change measures and reduces carbon embodiment, the site promoter has confirmed their commitment towards using non-fossil fuel heating for the proposed development. This will, therefore, assist with the climate emergency agenda, and ensure that the development is a wholly compliant scheme.

### *Electricity*

Asset maps provided by Western Power Distribution (WPD) show HV (11kV) overhead and underground cables within the site boundary. These will require diversion to facilitate development and WPD have provided a budget cost of £1,605,262.00 for the new connections and diversions. There is understood to be sufficient capacity within the local electricity network to accommodate the proposed development. It is to be noted that this **allows for sufficient capacity for low carbon technology (i.e., air source heat pumps & EV chargers)** – which will support the sustainability of the proposed scheme. New connections are to be made to the existing HV cables east of the A465.

### *Telecommunications*

Openreach will deploy FTTP (Fibre to the Premises) free of charge, into all new housing developments of 20 or more homes. Diversion or disconnection of existing overhead services within the site boundary crossing the proposed access to the development and supplying Roc House Farm may be required to allow for construction of the new access. Openreach will provide a budget cost for diversion on receipt of layout details. There is understood to be sufficient capacity within the local fibre network to accommodate the proposed development.

For further information, please refer to the submitted report.

## **7.0 ECONOMY (Q5)**

As set out, the proposed development represents a mixed-use form of development which seeks to incorporate a range of uses including B1 Office. This office space provision will be provided in the form of a 'Smart Work Centre' which would accommodate for home workers or people working remotely who reside in Abergavenny. The space supplied within the Centre will allow for professional desk space and meeting rooms for hire alongside access to business support and training. As such, the 'Smart Work Centre' will result in the creation of a small employment hub within the urban extension proposal, to the east of Abergavenny and in turn, create a number of jobs / workspace for existing and future residents.

The 'Smart Work Centre' would be located within the proposed Local Centre of the site, which will sit adjacent to the proposed Station Interchange to be created for Abergavenny rail station. This will allow for workers to travel to the proposed centre by sustainable means of transport, providing a link to Abergavenny and other settlements within the wider region.

In terms of the quantity of B1 floorspace to be provided, an indicative figure at this stage is not provided, however, it is expected that the Centre will be able to accommodate a number of businesses within the proposed office space – which will result in the creation of a number of employment opportunities. The uses will be located within the proposed Local Centre forming part of the development, which will include an area of land allocated to mixed-uses up to 0.75ha.

## 8.0 **INFRASTRUCTURE (Q6)**

### *Access Strategy*

As set out within the accompanying Access Appraisal undertaken and prepared by Lime Transport, there will need to be significant improvements to the pedestrian and cycle facilities between the site and the surrounding infrastructure, including the introduction of:

- Strategic pedestrian and cycle links alongside the A465 (to the west of the Candidate Site/Masterplan Area) as well as along the B4233 (to the north);
- Station interchange, including footbridge across the A465; and,
- Facilitate a footbridge across the A465 to connect with Firs Avenue (to the west of the railway).

It is also considered that the proposed development will need to be supported through improvements to the public transport infrastructure and services within the vicinity of the site, including:

- A station interchange (including Rail Park and Ride);
- A dedicated local circular bus service providing a fast, frequent service between the site, the railway station, bus station and town centre; and,
- A number of bus stops within the site.

It is considered that the above infrastructure requirements will ensure the site is sustainable, through the improvement of existing and proposed connections that promote sustainable travel to, from and within the proposed development. Further details are provided within the Access Appraisal pertaining to these matters.

### *Local Centre*

The masterplan framework adopted for this strategic development scheme is designed to encourage and promote a sustainable mix of uses that compliments the wider Abergavenny offering.

The following uses can be incorporated within the promoting candidate site boundary and will essentially promote the development as a sustainable scheme:

- Local Centre – up to 0.75ha of land for mixed uses including small scale retail, commercial and community units and residential on upper floors.
- Smart Work Centre – space to accommodate for home workers / people working remotely.
- Community Green – indoor/outdoor exchange space.

### *Woodland Community Hub*

As previously exemplified, a Woodland Community Hub will be created abutting the eastern boundary of the site, at the foot of Skirrid Fach, on a key recreational route aligned with the Local Centre and Station Link. It is considered that this unique location will offer an opportunity to provide an indoor and outdoor venue for a range of different user groups to meet, network and learn new skills. In terms of the required infrastructure / buildings to be incorporated within this proposed area, these are listed below:

- Community Building – Flexible space comprising provision that can accommodate community groups, and support artisan entrepreneurs and social enterprises, encouraging co-working and knowledge share.
- Community Woodland – New woodland area to connect the existing hillside woodland and greenways.
- Education – Woodland Primary School could be provided / if school not required on-site, off-site contributions for education would be provided.

### *Multifunctional Green Infrastructure*

A Multifunctional Green Infrastructure network is proposed, designed to retain, enhance, and extend the existing green assets and biodiversity within the site. A well-connected network of open space is proposed within the site, in order to create a unique setting for people and nature.

A comprehensive landscaping scheme is also proposed to ensure the integration of the proposed development with wider open space, ecological and landscape features.

The infrastructure requirements will be delivered through both S106 funding and on-site as part of the development, and will be agreed following approval of an Outline Planning Application.

## **9.0 SUSTAINABLE TRAVEL (Q7)**

### **9.1 - Sustainable Transport Hierarchy and Active Travel (Q7.a-Q7.c)**

Monmouthshire County Council are currently undertaking a three-month public consultation on the proposed Active Travel Network Maps in the County. The site is situated adjacent to a number of existing and proposed walking and cycling routes, which connect residential areas to key locations in Abergavenny, including the train and bus stations, pharmacies, schools, the town centre, surgeries and other services and facilities.

#### *Walking / Footways*

As shown on the map provided overleaf, the site does not benefit from any existing or proposed Active Routes for walking. However, the site is located immediately adjacent to 2no. proposed primary routes (ref: MCCC-A07B and MCC A07B) to the west, which will connect the train station to other areas of Abergavenny, including the bus station and the town centre. Given the site's proximity to this route, future residents of the proposed development will also have access to this walkway provision. These footways are also linked to other primary and secondary routes within Abergavenny, including those along the A40, and within the town centre. This evidences that the site has good pedestrian links which provides a means of travel for future residents over and above the private car.



Existing and Proposed Footpath Connections

| Key | Route                    |
|-----|--------------------------|
|     | Primary Existing Route   |
|     | Primary Future Route     |
|     | Secondary Existing Route |
|     | Secondary Future Route   |
|     | Local Existing Route     |
|     | Local Future Route       |
|     | Other                    |

### Cycling

In addition to the above, it is considered that the site is also strategically located in relation to the cycling network. Two proposed longer term cycling routes (ref: MCCC-A47A DL and MCC A47B) is shown on the map provided overleaf, which will run through the candidate site and provide cycle access to the wider network and Abergavenny train station. The site also sits adjacent to a number of proposed routes near to the train station and A40, which, again, will provide sustainable travel to a number of key amenities in Abergavenny.



| Key | Route                    |
|-----|--------------------------|
|     | Primary Existing Route   |
|     | Primary Future Route     |
|     | Secondary Existing Route |
|     | Secondary Future Route   |
|     | Local Existing Route     |
|     | Local Future Route       |
|     | Other                    |

Existing and Proposed Cycle Connections

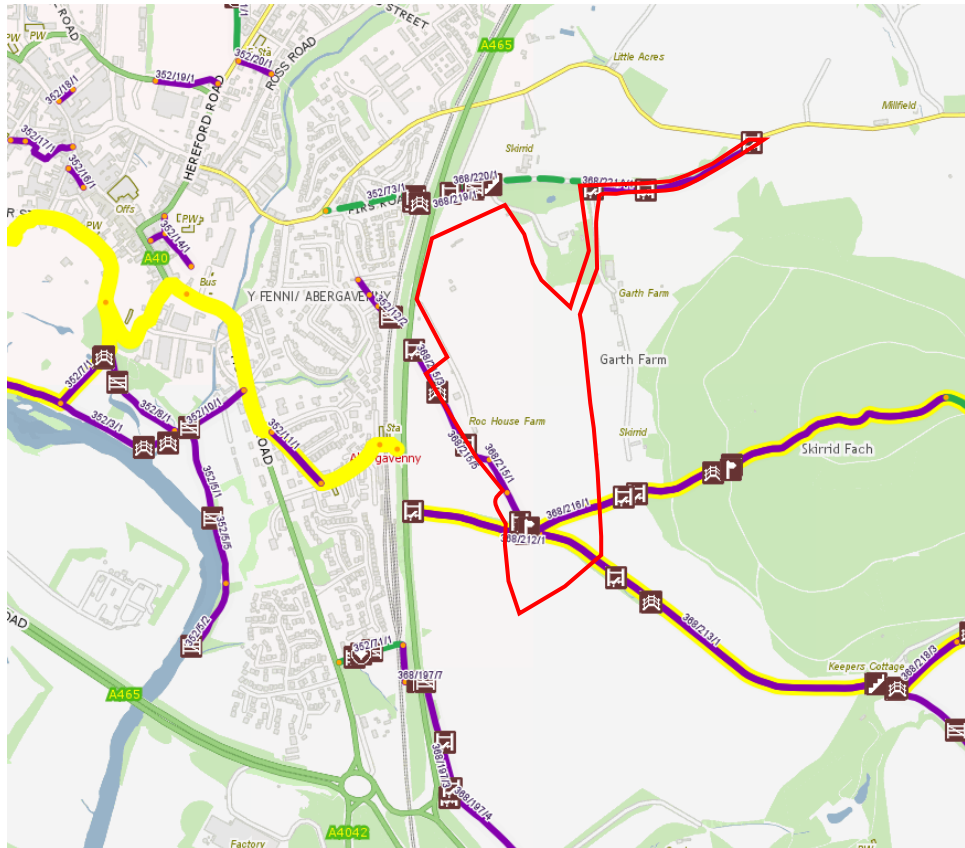
In light of the above, it is considered that the site is well related to, and potentially served by existing and proposed Active Travel Routes, in the immediate area. Future residents will have access to key services and facilities in Abergavenny, through the means of sustainable travel. These routes will allow a sustainable connection to be established between the proposed urban extension and the existing settlement of Abergavenny. As shown within the submitted masterplans and land-use frameworks, the proposed site seeks to link to these existing routes, and therefore, encourage their use through the means of sustainable travel to Abergavenny.

In terms of other cycle routes, the Access Appraisal submitted in conjunction with this submission, outlines that the closest cycle route to the site is a local cycleway that lies on the B4233 north of the strategic site, which provides access to Abergavenny town centre. The closest National Cycle Network (NCN) Routes (routes 42 and 46) are accessible from Tredillon road north of the B4233 with an underpass under the railway as part of the route.

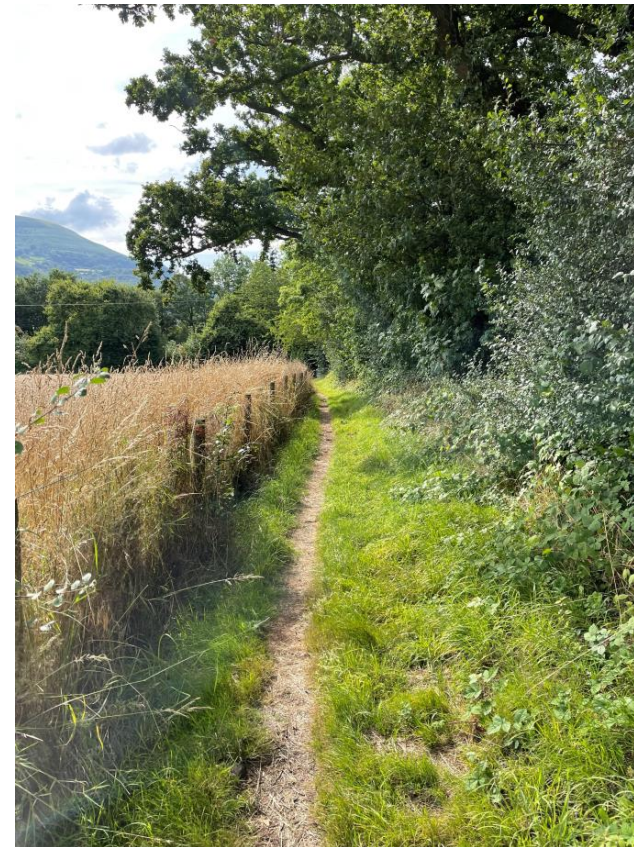
In the vicinity of the site, these routes provide access to NCN route 46 in Abergavenny town centre and various local villages to the north and south of the site, as well as Chepstow to the south-east, Neath to the south-west, and Hereford to the north. The route is provided on a mix of on and off-road sections.

### *Public Rights of Way (PRoW)*

The site benefits from a number of existing Public Right of Ways (PRoWs) which dissect the site east / west. These routes provide sustainable travel for pedestrians accessing key destinations in Abergavenny, whilst also promoting the enjoyment of Monmouthshire's countryside, and the town's hinterland.



Monmouthshire PRoW Map



Existing PRoW (no. 368/212/1) Within Site

### Public Transport

The accompanying Access Appraisal outlines that the site is located more than 500m from regular, scheduled bus services providing access to the wider area. Whilst most of these bus stops are beyond the acceptable walking distance of 400m, it is considered that in rural locations, a greater number of people may be prepared to walk further distances to access bus services.

As the enclosed Access Appraisal indicates, the nearest bus stops to the site are located circa. 500m (westbound) and circa. 950m (westbound) to the west of the site adjacent to the A465:

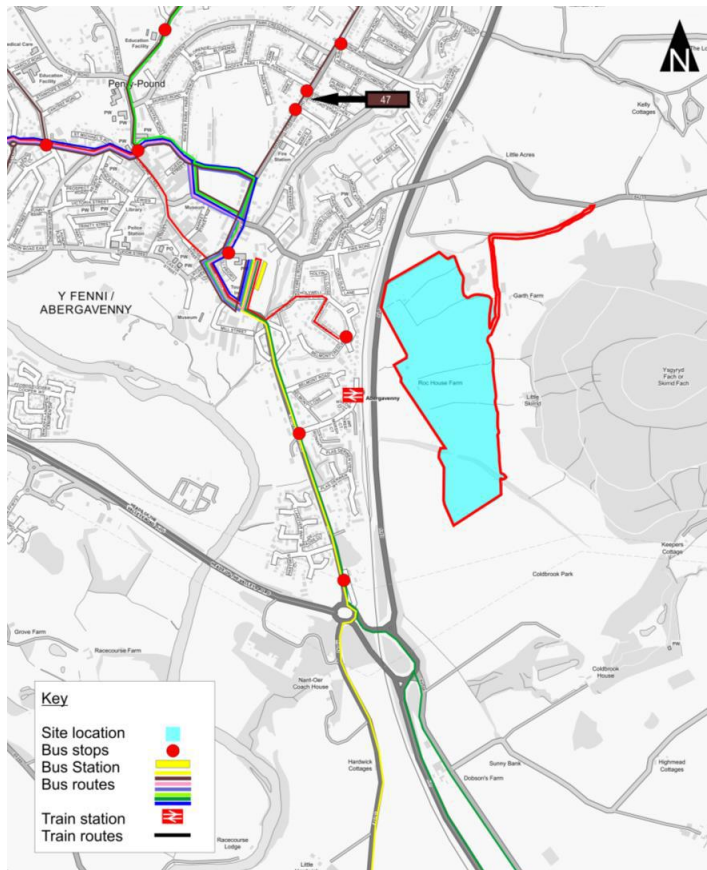
| No.                            | Nearest bus stop to site (km) | Route                                                  | Frequency        |
|--------------------------------|-------------------------------|--------------------------------------------------------|------------------|
| <b>Belmony Road</b>            |                               |                                                        |                  |
| <b>3</b>                       | 500                           | Brynmawr – Abergavenny                                 | Every 2 hours    |
| <b>Abergavenny Bus Station</b> |                               |                                                        |                  |
| <b>X3</b>                      | 950                           | Hereford – Abergavenny – Pontypool – Cwmbran – Cardiff | Every 2 hours    |
| <b>43/X43</b>                  | 950                           | Abergavenny – Brecon                                   | Every hour       |
| <b>A2</b>                      | 950                           | Abergavenny – Llwynu Estate                            | Every 30 minutes |
| <b>46</b>                      | 950                           | Abergavenny – Abergavenny via Knoll Estate             | Every 2 hours    |
| <b>47</b>                      | 950                           | Llanellen – Underhill Crescent                         | Every hour       |
| <b>X4</b>                      | 950                           | Abergavenny – Cardiff                                  | Every hour       |

*Summary of Relevant Bus Services within Vicinity of the Site*

The closest railway station to the site is Abergavenny railway station. The station is accessible on foot, via crossing over the A465 at-grade, and then crossing the railway using the existing footbridge approximately 300m south of the access to Roc House Farm.

The station lies on the Welsh Marches Line, with services operated by Transport for Wales between Manchester Piccadilly and Cardiff Central, Holyhead and Milford Haven. There are approximately two trains per hour in each direction, albeit the service frequencies are lower in the evenings and at weekends.

A map is provided below illustrating the existing public transport provision available within the vicinity of the site:



The 'Guidelines for Providing for Journeys on Foot' document prepared by The Institution of Highways and Transportation (2000) describes best practice in providing for pedestrians and provides acceptable walking distances for pedestrians to common facilities. The document suggests that for a non-town centre location the 'desirable' walking distance to facilities totals 400m: an 'acceptable' walking distance totals 800m: and a 'preferred maximum' walking distance totals 1200m.

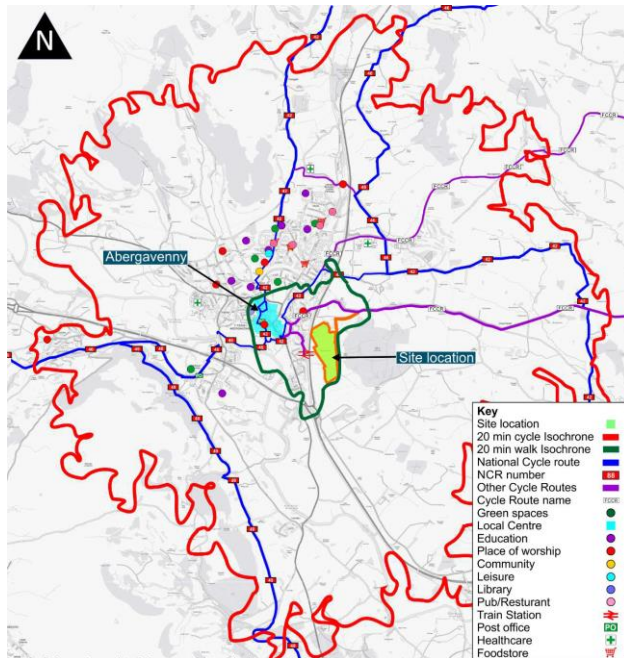
In light of the above, it is clear that the existing bus stops are located within the 'desirable' and 'acceptable' walking distances for future residents. The site is therefore considered to promote sustainable, integrated transport which provides highly accessible pedestrian links to public transport facilities.

#### *20-Minute Neighbourhood*

The proposed site layout of the development has taken into consideration the concept of the '20-minute neighbourhood', which encompasses the idea of 'living locally' and giving people the ability to access most of their needs within a reasonable walking or cycling distance of their home, with safe access to cycling and local public transport options. It is acknowledged that locating development near existing facilities reduces traffic and provides safer environments for people and children and also creates social, health and environmental benefits.

Whilst it is proposed that the site will accommodate its own facilities and services to cater for existing and proposed occupiers, given the relatively rural location of the site, it is considered that a 20-minute walk and cycle journey is more appropriate. As a result of this, the majority of facilities available within the town centre of Abergavenny are accessible, thus evidencing the site's inherently sustainable location.

Lime transport have produced a map illustrating all services and facilities that are accessible within a 20-minute walk and cycle journey of the candidate site, and this provided overleaf:



As shown within the above map, the provision of the strategic pedestrian and cycle links and the Station Interchange proposed (as outlined above) will open up access to a number of facilities within a 20-minute walk and cycle isochrone of the site, including employment uses.

## 9.2 – ACCESS (Q7.d-Q7.e)

### *Pedestrian and Cycle Access*

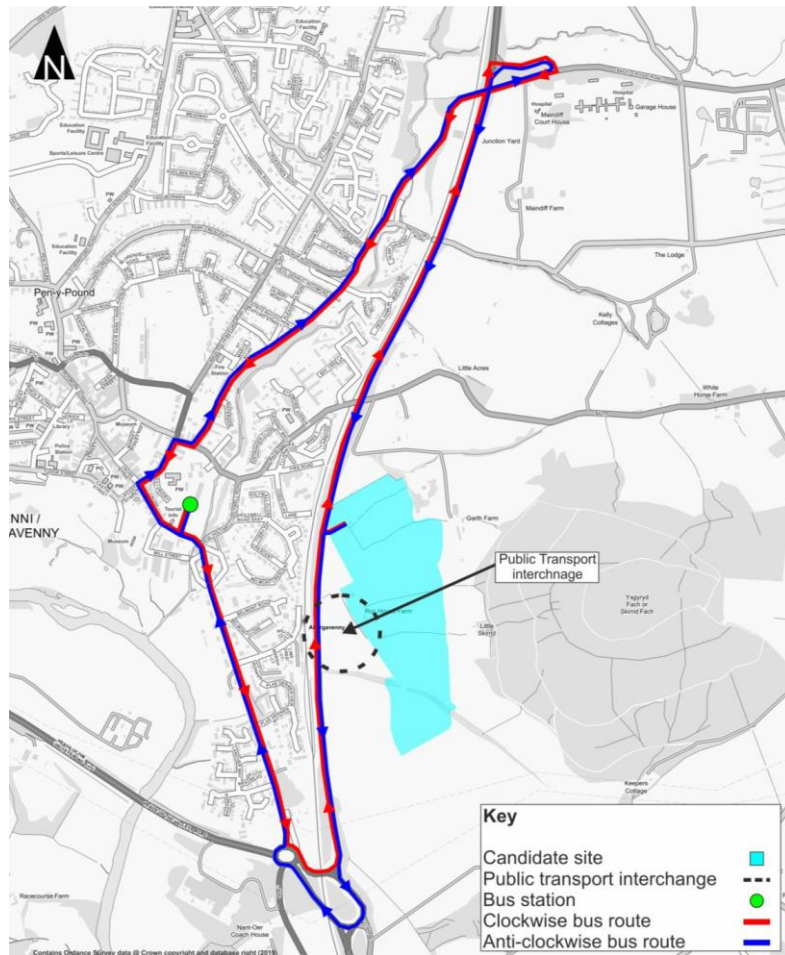
A Pedestrian and Cycle Strategy has been produced by Lime Transport, illustrating possible links from the proposed site to existing amenities and facilities located within Abergavenny, and maintains / improves east-west connections across the candidate site area. The key principles of the pedestrian and cycle strategy for the proposed development are outlined below:

- Creation of a strategic cycleway/footway alongside the A465, linking the B4233 (to the north) with the A40/A4042 (to the south);
- Creation of a Station interchange across the A465;
- Maintain and improve existing public rights of way across the site to increase usability throughout the year;
- Facilitate a new footbridge across the A465 to link to the existing footbridge across the railway at First Avenue;
- Create a number of access points to the masterplan area, to increase permeability and connectivity.



### Public Transport Strategy

As well as the creation of a Station Interchange, which includes the provision of a footbridge across the A465 and a Rail Park & Ride site, the public transport strategy includes the creation of a new local circular bus service that runs through the site. It is anticipated that the new service will provide a fast, frequent service between the site, the railway station, bus station and town centre.

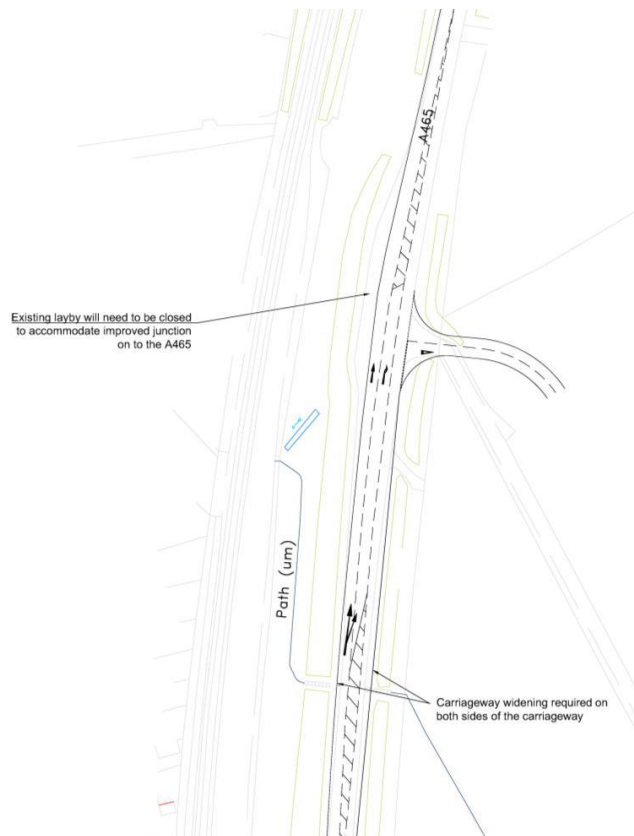


### Vehicular Access

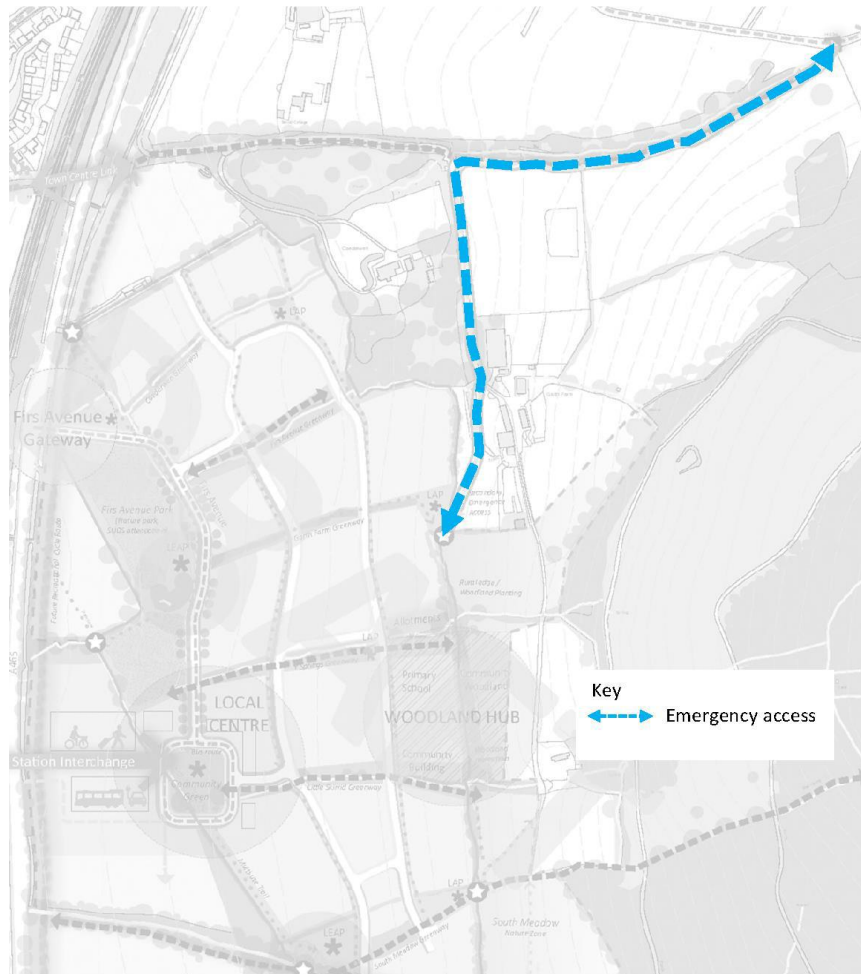
In order to access the proposed candidate site and the wider masterplan area, it is proposed to upgrade the existing access onto the A465 to Roc House Farm. The new junction has been designed in accordance with the Design Manual for Roads and Bridges CD123 - Geometric design of at-grade priority and signal-controlled junctions, and CD109 - Highway link design, and includes the following:

- A ghost-island right turn lane;
- 4.5m by 215 m visibility splays in both directions along the A465; and
- Compound junction radii to accommodate the swept-path of all vehicles likely to access the site.

The proposed access to the site is shown below:



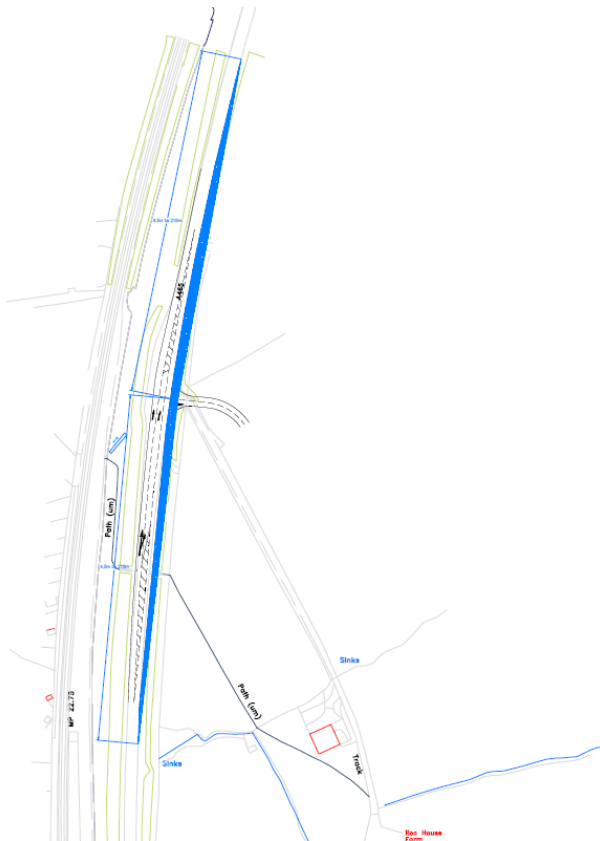
In addition to the creation of the main site access, it is also proposed to provide an emergency access on the B4233, as shown in the map below:



## 9.3 – VISIBILITY AND CAPACITY OF HIGHWAY NETWORK (Q7.f-Q7.g)

### 9.3a – Visibility

As outlined above, it is proposed that the existing access to Roc House Farm will be upgraded to provide a ghost-island right turn lane. This proposed infrastructure improvement will result in the creation of 4.5m by 215 visibility splays in both directions along the A465. These proposed and achievable visibility splays are illustrated below:



Given the nature and use of the A465, in terms of highway capacity and speed, it is considered that these proposed visibility splays are both appropriate and acceptable, and represent a safe and achievable access point to the site with no detrimental impact upon the safety of drivers and the highway network.

### 9.3b – Capacity of Highway Network

As conveyed within the Access Appraisal, the highway network in the vicinity of the site is dominated by the A465 Trunk Road, which runs in a north south direction along the western boundary of the candidate site.

The Access Appraisal, undertaken by Lime Transport, comprises a table demonstrating the capacity of the highway network, and this is reproduced below:

| Description         |                                                                                                                                                                                                                                                                                                                                          |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>A465</b>         |                                                                                                                                                                                                                                                                                                                                          |
| Description         | Single carriageway Trunk Road, which connects the A40 (to the south), with Hereford (approximately 35km to the north). There are very few junctions on to the A465, in the vicinity of the site, and no direct frontage accesses.                                                                                                        |
| Width               | Generally 8m wide                                                                                                                                                                                                                                                                                                                        |
| Speed Limit         | National speed limit (i.e. 60mph)                                                                                                                                                                                                                                                                                                        |
| Street Lighting     | None                                                                                                                                                                                                                                                                                                                                     |
| Crossing Facilities | At-grade crossings, with no formal facilities                                                                                                                                                                                                                                                                                            |
| Bus Route           | No                                                                                                                                                                                                                                                                                                                                       |
| Character           | Rural clearway, with open/agricultural land on the western side of the carriageway and a wide verge separating the carriageway from the railway line (along the western edge of the carriageway)                                                                                                                                         |
| On-Street Parking   | Rural Clearway, with a dedicated parking lay-by on the east and west side of the carriageway                                                                                                                                                                                                                                             |
| <b>B4233</b>        |                                                                                                                                                                                                                                                                                                                                          |
| Description         |                                                                                                                                                                                                                                                                                                                                          |
| Description         | Single carriageway local distributor road, that links Abergavenny (in the west) with Monmouth (in the east). which can be accessed via a priority junction off the farmland. There are no footways along the B4233 to the east of the A465, however there are footways on both sides of the road over the A465 and west into Abergavenny |
| Width               | Typically between 5-6.5m                                                                                                                                                                                                                                                                                                                 |
| Speed Limit         | National speed limit (i.e. 60 mph) transitioning to 30mph, approximately 360m to the west of the A465                                                                                                                                                                                                                                    |
| Street Lighting     | None to the east of the A465, but street lighting is provided to the west of the A465                                                                                                                                                                                                                                                    |
| Crossing Facilities | None                                                                                                                                                                                                                                                                                                                                     |
| Bus Route           | No                                                                                                                                                                                                                                                                                                                                       |

|                   |                                                                                                                                                                             |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Character         | Mainly fronted by open/agricultural land to the east of the A465, and residential frontages (albeit with limited direct frontage access) to the west A465 over the overpass |
| On-street parking | None                                                                                                                                                                        |

As set out within the Appraisal, the above table and the accident rate for the forementioned roads, whereby accesses are proposed to the site, have no significant concerns relating to highway safety, and as such, the proposed development will have no material impact on road safety at the adjacent roads.

In terms of trip generation from the site, and its impact upon the adjacent local highway networks, the Appraisal anticipates that the Candidate Site could generate up to 5,700 person trips throughout the day (7am to 7pm), with approximately 850 person trips (two-way) in the AM peak period and approximately 650 person trips (two-way) in the pm peak. This takes into account private vehicle-use, public transport, pedestrians and cyclists. Given this, the nature of the adjacent roads, and the proposal to promote sustainable travel to and from the site, it is considered that the proposed development will have no material impact upon the local highway network, and that the existing roads are capable of accommodating the proposed traffic movements. As previously outlined, the proposed junctions onto the existing highway networks will be able to accommodate the proposed vehicular movements, as a result of proposed infrastructure improvements to existing access points.

Notwithstanding the above, and as noted within the Access Appraisal, the Welsh Government has announced its long-term ambition to achieve 30% of Welsh workers working from home or near to home. The proposed development does seek to incorporate a 'Smart Work Centre' to promote and provide work space closer to home for the existing and proposed residents in this area of Abergavenny. As such, the highway capacity assessment / trip generation does not factor this into the appraisal, and therefore, it can be assumed that the above capacity of the highway networks can be viewed and considered as a 'worst-case scenario.'

## 10.0 SITE DELIVERABILITY AND VIABILITY (Q8)

In line with the Council's Candidate Site Methodology, and in conjunction with the Council's preferred Development Viability Model (DVM) produced by consultants Burrows-Hutchinson Ltd, the site promoter has prepared an initial development appraisal for consideration at this 2<sup>nd</sup> Candidate Site submission stage. This is submitted under separate cover, and should be treated as Private & Confidential.

### 10.1 – TIMESCALES (Q8.a-Q8.c)

As discussed within the Candidate Site Advice meeting with MCC, it is envisaged that an Outline Planning Application will be submitted prior to the formal adoption of the RLDP to ensure that delivery can be achieved on site at the earliest opportunity and the total proposed number of dwellings can be completed within the Plan Period.

Following approval of an Outline Planning Application, a Reserved Matters application will subsequently follow thereafter, whereby the site will be brought forward in phases, focusing on the areas immediately adjacent to the A465 first.

As shown in the expected delivery timescales table presented below, the site expects to be delivered within the plan period of the Replacement Local Development Plan.

| Stage                                            | Timeframe                                              |
|--------------------------------------------------|--------------------------------------------------------|
| Submission of Outline Application                | After examination (late 2023)                          |
| Submission of First Reserved Matters Application | Within 2 years of Outline Planning Permission approval |
| Submission of Last Reserved Matters Application  | Within 8 years of Outline Planning Permission approval |
| Commencement of Development on Site              | Within 1 year of Reserved Matters Permission approval  |
| Completion of Development on Site                | Within 10 years of Adoption of Plan                    |

## 10.2 – SITE HISTORY (Q8.d-Q8.e)

As previously outlined within this submission document, the site does not currently relate to an allocation in the Adopted LDP, nor has it had planning permission for residential development.

### 10.3 – SITE SURVEYS (Q8.f)

A suite of surveys and reports have been undertaken and submitted to support the submission of this candidate site - which has been outlined above within this document. For ease, however, these reports/surveys are reproduced below:

| Report / Plans / Survey                 | Description of work                                                                                                                                         | Summary of Findings                                                                                                                                                                                                                                                                                                                                        | Consultant                         |
|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| <b>Masterplan</b>                       | Masterplan indicating the proposed layout of development on the site.                                                                                       | Masterplan has taken into account the specific requirements for:<br><ul style="list-style-type: none"> <li>- Access</li> <li>- Drainage / SUDs</li> <li>- Green Infrastructure</li> <li>- Ecological Constraints / Buffering</li> <li>- Mix of residential tenures (Market, affordable, care)</li> <li>- Mixed uses</li> </ul>                             | Hammond Ltd                        |
| <b>Ecological Appraisal</b>             | An ecological appraisal of the site including the establishment of baseline conditions through a desk-based assessment and Extended Phase 1 Habitat Survey. | The combination of desk study and Extended Phase 1 Habitat Survey identified a range of habitats at the site. The areas of grazed improve grassland and arable field were considered to be of limited ecological importance. Further survey work required in respect of bats, birds dormice, reptiles and Great Crested Newts to take place in the future. | Soltys Brewster                    |
| <b>Landscape and Visual Appraisal</b>   | A landscape and visual assessment of the site for a proposed mixed-use development regarding landscape character (on-site and off-site) and visual amenity. | The effects of the development on the landscape character are limited and any negative impacts are outweighed by the potential GI benefits the scheme will have.                                                                                                                                                                                           | MHP Design                         |
| <b>Archaeology Assessment</b>           | A desk-based assessment to determine the archaeological and heritage potential of the site.                                                                 | The site is not greatly constrained by heritage or archaeological considerations. The assessment concludes that the proposed development is likely to have a limited effect on historic assets and archaeology.                                                                                                                                            | Archaeology Wales                  |
| <b>Air Quality Assessment</b>           | Sets out a baseline assessment of air quality in the area.                                                                                                  | The existing air quality at the site is assessed to be 'good' and therefore, acceptable for future residents. The assessment concludes that the proposed development will not have any significant effect on air quality at nearby existing residential and ecological sites.                                                                              | Air Quality Consultants            |
| <b>Agricultural Land Classification</b> | Sets out the findings of the Agricultural Land Classification of the site.                                                                                  | The survey, carried out in July and August 2021, has identified that the site is a mixture of land quality but mostly Subgrade 3b "moderate" quality with some area comprising Grade 2 'very' good quality.                                                                                                                                                | Kernon Countryside Consultants Ltd |

| Report / Plans / Survey        | Description of work                                                                                                                                                                                 | Summary of Findings                                                                                                                                                                                                                             | Consultant                |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>Drainage / Flood Risk</b>   | Review of existing and proposed surface and foul water, and the site's location within the River Usk Phosphate Catchment Area.                                                                      | The site lies within Flood Zone A. The site has existing / potential efficient solutions for surface and foul water flow drainage and will incorporate appropriate SuDS features. The development will be able to achieve Phosphate neutrality. | Quad Consult              |
| <b>Noise Impact Assessment</b> | A comprehensive review and assessment of noise constraints affecting the site – including adjacent transport networks.                                                                              | No sensitive receptors are located within NEC C or NEC D areas and as such, ambient noise is not considered to be a significant constraint at the site.                                                                                         | Hunter Acoustics          |
| <b>Tree Survey</b>             | A survey of trees on the site.                                                                                                                                                                      | The site doesn't accommodate major arboricultural constraints, and will be enhanced through GI and further landscaping provisions                                                                                                               | Broadway Tree Consultancy |
| <b>Access Appraisal</b>        | Review the existing transport conditions within the vicinity of the site, identify options to access the site, and provide recommendations as to the most suitable access strategy to support site. | The constraints identified can be overcome, through improvements to the existing surrounding infrastructure and access points.                                                                                                                  | Lime Transport            |
| <b>Ground Conditions</b>       | A desk-based review of the existing ground conditions of the site.                                                                                                                                  | The site is not constrained by any existing contamination issues and the overall risk for the site is considered to be low/medium.                                                                                                              | Integral Geotechnique     |
| <b>Utilities Search</b>        | A review of the existing utility capacity at the site and how the proposal can connect to the surrounding infrastructure.                                                                           | The site benefits from existing utility connections within the vicinity of the local area. Infrastructure improvements are required to improve capacity.                                                                                        | M-EC                      |

#### 10.4 – DEVELOPER (Q8.g)

The site promoter, Monmouthshire Housing Association, will develop the site subject to allocation and appropriate approvals. The site promoter is an established developer / housebuilder with an extensive track-record of delivery high-quality developments within the County.

MHA have confirmed that they are committed to the purchase of S106 housing and are allowing financial capacity within their business plan.

#### 10.5 – CONSTRAINTS / COVENANTS (Q8.h)

There are no existing Legal Covenants / Constraints tied in within the landownership of the site, that would constrain the site's suitability for development.

In terms of physical constraints present at the site, this has been conveyed within this document above.

## 10.6 – ABNORMAL COSTS (Q8.j)

As set out above, the site promoter, is an experienced developer / housebuilder within the County, with an extensive track-record of delivering residential sites and as such, all abnormal costs pertaining to matters such as contamination, archaeology and remediation have been factored in to their overall budget and financial appraisal of the proposed scheme.

In particular, the following abnormal costs have been considered as part of the viability assessment of the site:

### *Foul Requisition*

Discussions have been held with Welsh Water with regards to Foul Requisition connections in the vicinity of the site. Given the nature of the existing site, it does not currently benefit from any existing infrastructure and as such, a hydraulic modelling assessment (HMA) will be required in order to set out what reinforcement works are required to support the site, with the sewer requestion design dependant on the result of the HMA. Three possible connections have been identified and as such, a HMA will be undertaken at a later date, prior to / during the submission of a planning application.

### *Attenuation*

Attenuation here has been allowed for as a worst case scenario of permeability across the site, and by allowing this, it will prevent the loss of residential units later on in the development, given that it has been accounted for at this early stage.

### *Noise Attenuation*

The site promoter will work with the technical consultants and EHO to develop the most economical layout of the site, to reduce the requirements of noise mitigation solutions, whilst implementing such solutions where acceptable. No residential development has been allowed for in any NEC D, as shown within the masterplans.

### *Access*

The site promoter is currently working with their transport consultants and Trunk Road to make use of the existing access to the site, and how improvements can be made to ensure its sufficiency to support the proposed development. Discussions have also taken place in relation to the secondary / emergency access of the B4233 and how this can be upgraded to support the urban extension. Again, costs have been accounted for in terms of potential infrastructure improvements to be required to accommodate the expected traffic generation at these proposed accesses.

### *Landscape / Visual Impact*

As set out within the Landscape Appraisal and Ecological Appraisal undertaken at / of the site, mitigation measures will be required to enhance biodiversity and soften areas of the site to reduce its visual and landscape impact on the site and its surroundings. As such, the costs for these measures have been included within the site promoter's financial appraisal of the site.

### *Phosphate*

As already noted, the site sits within the Phosphate Catchment of the River Usk, whereby the development will be required to achieve phosphate neutrality / betterment through the implementation of adequate and necessary measures to remove any potential phosphates over and above the allowable limit. A number of measures have been identified within the accompanying Drainage Report which require further discussions with the relevant water bodies including DCWW and NRW, which will be at the cost of the site promoter.

Given that this is a prominent and widespread issue across South Wales, the site promoter has at this stage been unable to factor these costs into their viability appraisal of the development. However, as this matter evolves, the promoter will ensure that appropriate mitigation measures will be in place to address phosphorus target failures in protected waterways, and that a strategy is developed to remove phosphates from the foul water generated by the development from residential, commercial and leisure sources.

## 10.7 – DELIVERABILITY (NON-RESIDENTIAL) (Q8.j)

As set out above within this submission, the proposal seeks to incorporate a mix of uses to the central/western location of the site, surrounding the community hub space. These uses include office space (B1) and a convenience store (A1) to support and promote the creation of a new community whereby residents reside to live and work – essentially, creating a sustainable community / extension to Abergavenny. Given the location of these uses, they will be brought forward for planning and delivered within the first phases of the site delivery – in order to provide provision of services and facilities to future residents within the scheme.

Prior to the completion of these mixed-uses, they will be appropriately marketed to potential occupiers, in particular to local businesses, in order to support the local economy and increase the economic viability, vitality and attractiveness of Abergavenny as an 'employment hub', in the north of the County. These uses will result in the creation of jobs for both existing and future residents in Abergavenny, whilst also establishing a new location for businesses to locate.

The amount of employment land to be delivered will depend upon market conditions at time of delivery. This could grow or contract by up to 50% in terms of amount employment land to be delivered. However, it is proposed that a land area of up to 0.75ha will contain a mix of uses, in the form of a new Local Centre, that will include office space provision.

## 10.8 – BUILD RATE (Q8.k)

In terms of the approximate timescale for site delivery, and yield of development, the expected delivery timetable is broadly as follows:

| Year | No. of Dwellings |
|------|------------------|
| 2023 | 0                |
| 2024 | 0                |
| 2025 | 16               |
| 2026 | 73               |
| 2027 | 73               |
| 2028 | 73               |
| 2029 | 73               |
| 2030 | 73               |
| 2031 | 73               |
| 2032 | 73               |
| 2033 | 73               |

The above build rate has been calculated on the basis that 0.7 dwellings are completed per week when two developers are on site simultaneously.

## 10.9 – AFFORDABLE HOUSING (Q8.I-Q8.m)

### 10.9a – Affordable Housing and S106 Contributions

The site promoter has incorporated the provision of 35% affordable homes within their viability assessment of the proposed scheme, and can confirm that the site is viable based on this percentage and S106 contributions likely to be required per dwelling.

### 10.9b – 50% Affordable Housing

The site promoter has confirmed that the provision of 50% affordable housing is not viable within this proposed development, and therefore, cannot be achieved. The demand / mix of affordable housing provision to meet a level of 50% at this site would undermine the proposed development's viability, to its detriment, and would not represent an appropriate level of affordable housing to bring this site forward for development. This level of provision would put pressure on the viability of the development to deliver housing, and other uses proposed within the site, and therefore, its overall suitability and deliverability.

MHA are a key Registered Social Landlord in Monmouthshire and have a significant track record in delivering affordable housing across the County. This is evidenced by their current high number of stock of affordable housing across Monmouthshire, for which they contribute considerably to meeting and achieving the current identified demand for affordable housing provision in the County. Therefore, the site promoter of this proposed development delivers a quantum of affordable housing within Monmouthshire on sites whereby 100% affordable housing provision has been implemented.

It is noted that a high provision of affordable housing does not essentially create sustainable communities, to the contradiction of MCC's key aim to deliver 'Sustainable and Resilient Communities' across Monmouthshire in the plan period. Planning Policy Wales 11<sup>th</sup> Edition outlines that 'Sustainable Places' are the goal of the land use planning system in Wales. In particular, paragraph 2.3 of PPW11 outlines that *"the planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly."* The incorporation of 50% affordable housing provision can undermine the potential to create a sustainable community, given its material impact on site layout, quantity of housing, house types, and other matters, and therefore, result in the proposed development failing to constitute a 'sustainable and resilient community.'

The key to affordability and reducing reliance on social housing is to provide a sufficient range and choice for the sub-market buyers, whereby Abergavenny is recognised as a Main Town within Monmouthshire, where the main focus for new housing development, in particular affordable housing, is attributed to. A higher proportion of market housing within the overall development site quota, will lead to opportunities for buyers to purchase homes in their own right (freehold), and therefore, reduce the reliance on social housing within the County.

It is also acknowledged that Abergavenny is physically constrained on all three sides: North (National Park / Landscape), South (River Usk / Floodplain) and East (Man-made barrier / A465). Subsequently, in order overcome this barrier, a requirement for new infrastructure, which will allow Abergavenny to grow sustainably for many more plan periods to come / follow, is required to ensure that appropriate growth can be achieved. As such, the costs of achieving this will need to take into account the level of infrastructure required to unlock land to the East for development, and establish a new sustainable and resilient community / extension to Abergavenny. Of course, in turn, this 'unlocking' of the site will provide for further opportunities of development to the east of

Abergavenny, as a result of developing to the east of the A465, and the associated infrastructure improvements / implementations to bring this strategic area of land forward for development.

As outlined in the proposed 'Build Rate' for the development above, the site is ready for deliverability in the short-medium term and as such, presents an excellent opportunity in Abergavenny to provide and achieve a high number of completed dwellings and associated growth, within an acceptable timeframe that will meet the identified number of dwellings (indicative no. of 1,893) in the Preferred Strategy in Abergavenny.

Finally, and as outlined previously, there are a number of abnormal costs that put pressure onto the viability of the proposed development to deliver housing and other uses, given that further surveys, mitigation solutions and other work will be required to bring this site forward for development. Therefore, taking these costs into consideration, a provision of 50% affordable housing would deem the site unviable and therefore, unacceptable for a strategic development opportunity.

## 10.10 – CLIMATE EMERGENCY (Q8.n)

As set out above in this submission, as part of the land framework prepared for this submission, climate change adaptation and resilience measures have been considered and incorporated, to ensure that the proposed mixed-use development will adapt, avoid and mitigate against climate change and meet carbon reduction targets identified in the RLDP.

Welsh Government has set targets for the generation of renewable energy. These include a target for Wales to generate 70% of its electricity consumption from renewable energy by 2030, for one Gigawatt of renewable energy capacity in Wales to be locally owned by 2030 and for new energy projects to have at least an element of local ownership (Paragraph 5.7.14).

PPW confirms that the planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings – in line with the energy hierarchy below:

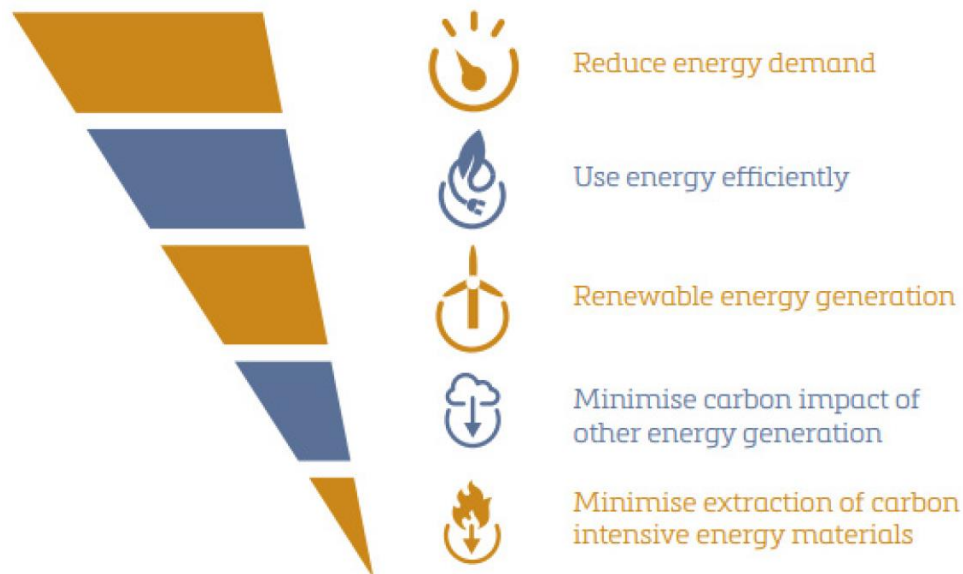


Figure 10: Planning Policy Wales Energy Hierarchy

The site promoter have unequivocally confirmed their commitment to Part L and Part F, regardless of its adoption, and to ensure that the development reduces carbon embodiment and identifies MCC solutions that will reduce wastage and materials within the site. There have been a number of opportunities identified within the scheme to reduce carbon emissions, including promoting southerly facing roofs for solar PV integration, incorporating green bus stops served by electric vehicles and providing space for cycle hire, car share and communal and on plot electric car charging.

Given the above, these climate change measures have been taken in account within the site promoter's financial appraisal of the site, in terms of the costs to implement these measures to ensure that the scheme achieves the targets referred to above. The associated costs for the climate changes measures do not undermine the viability of the proposed development and as such, the site remains financially viable and deliverable to bring forward for development.

### **10.11 – HOUSING MIX (Q8.o)**

The proposed housing mix for the mixed-use is as follows:

#### *Market Housing – 65%*

45% - 4 bed homes  
35% - 3 bed homes  
20% - 2 bed homes

This will consist of detached and non-detached houses and bungalows. The exact mix will be dependent upon market conditions at the time of reserved matters application.

#### *Affordable Housing – 35%*

25% - 1 bed homes  
50% - 2 bed homes  
15% - 3 bed homes  
10% - 4 bed homes

This will consist of houses, bungalows and flats with the exact mix and tenure to be agreed with MCC's Strategy and Policy Officer for Affordable Housing.

## 10.12 – VIABILITY ASSESSMENT (Q8.p)

In reference to the Development Manual, paragraph 5.84 states that:

*"To support delivery of the plan, site specific viability appraisals should be undertaken for those sites which are key to delivering the plan (the size threshold can vary between LPAs). An appraisal will enable more detailed information to be taken into account having regard to the site-specific details. The preferred approach is for this to be done in conjunction with a site promoter who has access to the detail, or conversely through more detailed modelling with site-specific assumptions. Much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high-level appraisal. The two are not contradictory, rather, the site specific being a refinement of the high-level appraisal. This should be undertaken as early as possible."*

### *Site Specific Viability Appraisals*

Paragraph 5.94 of the Development Manual states:

*"Viability appraisals for key sites in the plan will provide more detail and certainty than a high-level testing approach. They offer the opportunity to better reflect more local circumstances within the broader market/sub-market area as well as some known costs, rather than a notional approach."*

Finally, paragraph 5.97 states:

*"It is recognized the level of information provided may be variable and dependent on where the site is in the development management process and the willingness of the landowner/developer to engage. It is imperative that as much information as possible is provided by all relevant parties to ensure sites can be delivered and included in the development plan. Where it has not been possible to obtain the necessary information, it may be appropriate to exclude them."*

In light of the above, the promoters, Monmouthshire Housing Association, have undertaken a high-level viability assessment, based on up to 635 no. units and confirms that taking into account the S106 obligations expecting to be levied, appropriate build costs (inclusive of SUDS / SAB and GI enhancements), the scheme is wholeheartedly viable in all respects.

It must be stressed however that the assessment is headline in its nature, and that further discussions at the appropriate time with the LPA would be advised to confirm matter such as the required affordable housing provision and likely S106 costs including education, open space and infrastructure.

The site promoters would welcome the opportunity to discuss this aspect further with the LPA, and is prepared and willing to engage in this process. It is understood that, should this site be selected as an allocation, then a site-specific model will be produced and shared with the site promoter for completion and continued liaison with the Council. We would welcome this approach and look forward to discussing the financial model at the appropriate time.

As set out in Section 10 above, and in line with the Council's Candidate Site Methodology, and in conjunction with the Council's preferred Development Viability Model (DVM) produced by consultants Burrows-Hutchinson Ltd, the site promoter has prepared an initial development appraisal for consideration at this 2<sup>nd</sup> Candidate Site submission stage. This is submitted under separate cover, and should be treated as Private & Confidential.

This appraisal, along with the extensively detailed technical submission confirm the site is viable, and should be referred to for greater detail.

We would wish to discuss this aspect further with the LPA throughout the next stages of the LDP process.

## 11.0 **SUMMARY AND CONCLUSIONS**

In light of the above, and the enclosed, the Site Promoters are committed to working towards ensuring that the development site can be delivered as a comprehensive sustainable development, providing much-needed homes for Monmouthshire County and South Wales Region. The masterplan has fully assessed and designed the development to ensure the sustainable placemaking objectives of PPW11 are considered and are fundamental components of the approach to bringing forward development at the site.

As outlined within this statement, the proposed site is considered to be suitable for development for a number of uses including residential, employment, retail and education, and therefore, acceptable for the following reasons:

- **The Candidate Site is promoted and back by a leading developer in the County and has completed a headline viability appraisal to confirm the site and various provisions can be accounted for, without compromising the delivery of the site;**
- **The proposed site has been designed around the 20-min Neighbourhood concept, and is evidenced that the whole of Abergavenny can be accessed within a 20-min walk;**
- **The proposed development is wholly compliant with the goals, aims, objectives and concepts of Placemaking set out within Planning Policy Wales (11<sup>th</sup> Edition) and Future Wales: The National Plan 2040 through the creation of a sustainable and resilient community.**
- **The site is suitable and available for development, and can deliver housing in the short to medium term.**
- **The proposed development will contribute significantly to the overall identified housing need (1,893) in Abergavenny within the Plan Period.**
- **The proposed development will incorporate significant climate change mitigation measures to the scheme to accord with Monmouthshire County Council's declared Climate Emergency.**
- **The proposed strategic scheme presents opportunity to unlock land to the East of the A465 and the railway line, with the significant upgrading of infrastructure to bring the site forward and other future land for development.**
- **In addition to providing much-needed housing in general, the proposed development will provide for an established need for additional affordable housing adjacent to the settlement of Abergavenny (with the direct involvement of Monmouthshire Housing Association from the outset).**
- **The site lies directly adjacent to the boundary of the settlement limit, and as such, is not positioned within an 'isolated' location within the open countryside and represents a logical sustainable extension.**
- **The site benefits from established footpath and cycleway links and is within convenient walking distance from existing bus stops – with proposed upgraded improvements to existing pathways.**
- **The highway and access improvements to be implemented as part of the proposed development will further enhance the site's sustainability and connectivity.**
- **There are no air quality, noise, ecology or drainage constraints to development.**

Having regard to the above key material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme, which makes good use of this site.

Accordingly, it is therefore considered that the proposed development is acceptable and we would respectfully request that the candidate site is allocated in the upcoming RLDP.

## Annex

### DEVELOPMENT PLANS MANUAL EDITION 3 MARCH 2020

Paragraph 5.2 states: *'A key national priority is to deliver high quality, sustainable places, through a Placemaking approach which must be at the forefront of plan making. Plans must be prepared in line with the gateway test and search sequence set out in PPW. The National Sustainable Placemaking Outcomes must be used to inform the preparation of development plans. This will ensure development is located in the right place and places are planned comprehensively and achieve quality outcomes for communities. Understanding how places function at both a strategic and local level should influence how plans are prepared and implemented.'*

Paragraph 5.3 states: *'At a strategic level, design informs the spatial vision for places and ensures that sustainability sits at the heart of a plan, whilst also creating a framework to help deliver wider objectives through an integrated Placemaking approach. This can include LA strategies such as Well-being Plans, regeneration areas, site allocations, town centre strategies and the promotion of sustainable transport modes and delivering infrastructure. The plan making process should consider how Placemaking principles and good design influence the scale and location of development. At a local level, the plan and policy framework should ensure the creation of well designed quality places where people will want to live, work and visit. Placemaking Tools as an Evidence Base – Master Planning Approach Placemaking 'tools' can be a useful mechanism when prepared in parallel with the plan to inform development proposals and policies and ensure effective implementation and delivery.'*

Paragraph 5.4 states: *'The value of a Placemaking approach in the preparation of plans is to identify key design parameters and cumulative infrastructure requirements of development across the wider area to inform policy and site-specific allocations. This approach will ensure LPAs are in the driving seat and have sufficient 'teeth' to implement the key design and infrastructure requirements of sites, particularly where there are large sites in multiple phases and ownership, programmed over many years.'*

Paragraph 5.5 states: *'The most appropriate 'Placemaking tool' for a development plan will be for the LPA to determine, based on the scale of site(s) and where sites are in the development process. Table 11 shows how Placemaking tools should be used as part of the plan's evidence base. Where possible, this work should be undertaken collaboratively between the LPA and key stakeholders responsible for the delivery of the site, as well as the local community. It will be essential for statutory bodies to comment on key issues such as flooding, sewerage infrastructure, natural environment and health. This will give the plan a legitimate base, highlight key issues, requirements and constraints that can be taken account in the master planning process, achieving high quality places. Development Plans Should Contain:*

*A strategic and locally distinctive Placemaking vision for the plan area (informed by Council strategies/WBPs) supported by appropriate design policy(s) / master planning principles / green infrastructure and access. Where there are specific issues SPG can be prepared.*

*Concept/schematic frameworks, design principles and infrastructure requirements for key sites (set out in policies) that are core to delivery of the plan. Key sites and Placemaking and infrastructure requirements should be considered in detail from the early stages of plan making, prepared in collaboration with developers and the community. They can provide a key starting point for further design collaboration and inform detailed site specific master planning and viability work.'*

Development Plans Manual Edition 3 - Table 11: Placemaking Tools as an Evidence Base

| Master planning approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | How to embed in the development plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Concept / Schematic Framework</b></p> <p>Flexible conceptual vision setting out the key elements of a site (access, physical infrastructure, green infrastructure networks, development areas/uses, landscape, key features, key opportunities and constraints).</p> <p>Set out area/site specific planning issues and constraints.</p> <p>Set out the key vision and high level design principles of a site and how it should be developed.</p> <p>Can provide a broad mechanism for assessing and influencing proposals as they come forward.</p>                                                                                                                                                                                                                                                                                                                          | <p>Can be embedded as part of site specific policies, a broad mechanism for assessing and influencing proposals as they come forward.</p> <p>Useful for key/strategic sites that are core to the delivery of the plan.</p> <p>Green Infrastructure Assessments / Area Statements should inform the master planning approach for site allocations to support ecosystem resilience and identify nature based solutions.</p> <p>The information should be used to inform infrastructure requirements / viability of sites. They can be made explicit in the plan.</p> <p>Prepared as SPG (including Place Plans).</p> |
| <p><b>Master planning approach</b></p> <p><b>A Detailed Master Plan Approach</b></p> <p>Can be universal or site specific. Can identify key design principles that are definitive and vital to the creation of sustainable places and those where more flexibility can be applied.</p> <p>High level framework covering key parameters / master planning requirements for a larger area or site specific:</p> <ul style="list-style-type: none"> <li>• Land uses, particularly those core to determining layout</li> <li>• Density and house types (where known)</li> <li>• Scale &amp; massing</li> <li>• Key access, movement corridors and the street hierarchy</li> <li>• Transport / movement (all modes)</li> <li>• Green infrastructure</li> <li>• Physical infrastructure</li> <li>• Biodiversity</li> <li>• Renewable energy / energy efficiency opportunities</li> </ul> | <p>Can be embedded within the plan as a general design policy / overarching policy requirements – set out in a policy and or graphical format.</p> <p>Can be embedded as part of site specific or a general design policy.</p> <p>Design principles and infrastructure requirements in broad terms or site specific.</p> <p>Useful for key/strategic sites that are core to the delivery of the plan.</p> <p>The information should be used to inform infrastructure requirements / site specific viability work. They can be made explicit in the plan.</p> <p>Prepared as SPG (i.e. Place Plan)</p>              |

- |                                           |  |
|-------------------------------------------|--|
| • Phasing and infrastructure requirements |  |
|-------------------------------------------|--|

*Implementation Appendix*

Paragraph 5.127 states: *'The purpose of an Implementation and Delivery Appendix is to set out the key issues, constraints, phasing and mitigation measures which are required to deliver proposals in the LDP, from which monitoring indicators and triggers can be derived. It will comprise brief descriptions of the key sites, together with an overview of site specific delivery and implementation issues, including site constraints, necessary mitigation / compensation measures and policy/ s106 agreements/ infrastructure requirements. This information will clarify the infrastructure requirements of key sites and alert potential developers in respect of expectations when bringing forward sites at the planning application stage with all relevant information known. All parties will know, in advance, what will be expected and consequently should be factored into the costs of bringing sites forward from the outset. Table 26 sets out the type of information to be contained in an Implementation and Delivery Appendix.'*

Paragraph 5.128 states: *'Key sites integral to the delivery of the plan may require their own specific policies setting out key issues and constraints, master planning principles, concept frameworks and infrastructure requirements where appropriate.'*

As outlined above and detailed further within this submission, the documents referenced in this section have, amongst various other inputs, been used to inform and support considerable dialogue on the site's potential for development. All are available to the LPA as part of formal submissions made previously, and as such have not been reproduced or resubmitted in whole as part of this submission. These submissions are referenced and extracts have been drawn from them in specific instances. The extent and breadth of the assessment and reporting provides a detailed and robust evidence base on which these submissions have been informed and are based.

## NATIONAL PLANNING POLICY

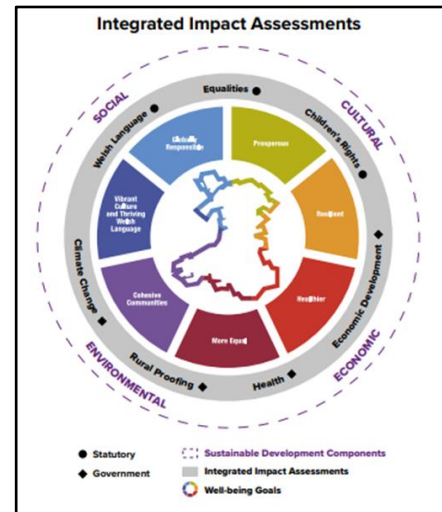
### *Future Wales: The National Plan 2040*

#### *Background to the plan*

Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan as the national development framework setting the direction for development in Wales up to 2040. Future Wales represents the highest tier of development plan and focuses on solutions at a National Scale setting out a framework which will inform Strategic Development Plans at a regional level and Local Development Plans (LDPs) at local authority level. The document consists of a development plan which aims to set out a strategy for addressing key national priorities through the planning system. These include, but are not limited to, developing a vibrant economy and improving the health and well-being of communities. The document is aware of challenges including the climate emergency and the ongoing effects of the global health pandemic and, in fact, aims to re-energise the economy in a sustainable way.

#### *Integrated Sustainability Appraisal*

Future Wales recognises the importance of The Well-being of Future Generations Act, discussed in detail in the next section of this document, and its obligations. The Wellbeing of Future Generations Act has influenced Future Wales and its principles, including the 5 ways of working (long-term thinking, prevention, collaboration, integration and involvement) which have actively been embedded into the plan. Through the development of Future Wales, the plan has been subjected to the Strategic Environmental Assessment and Sustainability Appraisal approach, shown in the image below, as well as other impact assessments. Through this approach, ongoing stakeholder engagement and the use of the Well-being of Future Generations Act to inform the plan, the principles of sustainable development have been embedded within Future Wales.



*Integrated Impact Assessment*

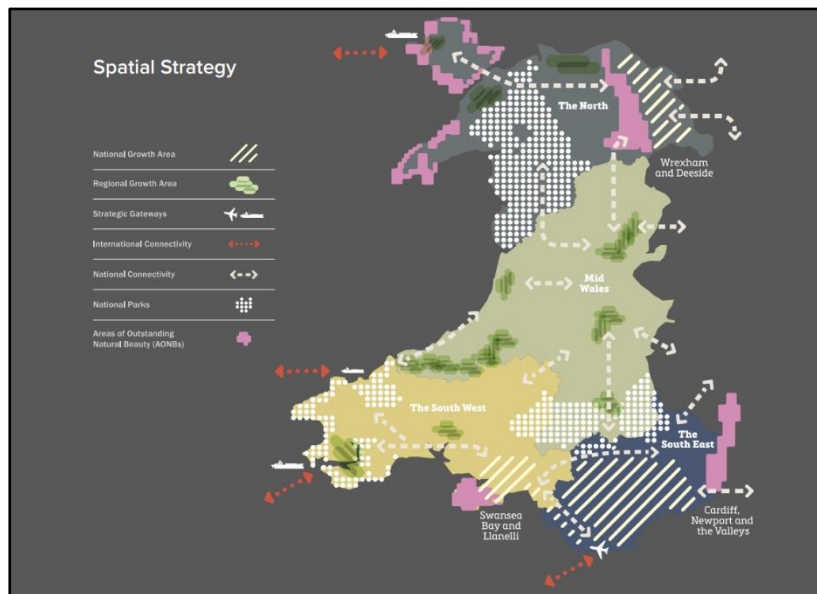
### *The Future Wales Outcomes*

In order to achieve its vision by 2040, Future Wales has set out 11 outcomes which act as overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales. The 11 Outcomes effectively represent the goal for Wales in 2040. These outcomes include:

- A Wales where people live and work in connected, inclusive and healthy places;
- A Wales where people live in vibrant rural places with access to homes, jobs and services;
- A Wales where people live in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- A Wales where people live in places with a thriving Welsh language;
- A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth;
- A Wales where people live in places with prosperity, innovation and culture are promoted;
- A Wales where people live in places where travel is sustainable;
- A Wales with world-class digital infrastructure;
- A Wales where people live in places that sustainably manage their natural resources and reduce pollution;
- A Wales where people live in places with biodiverse, resilient and connected ecosystems; and
- A Wales where people live in places which are de-carbonised and climate resilient.

### *Future Wales Spatial Strategy*

The Future Wales' spatial strategy sets out a 'guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefits of everyone in Wales.' Whilst Future Wales encourages development in cities and large towns to grow urban areas and utilise the potential of these places, it must be noted that the plan also states that 'in all parts of Wales the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy'. An extract of the Wales spatial strategy, identifying south east Wales as a national growth area, is provided overleaf. For the south east Wales region, the Future Wales plan states that 'housing, economic growth, digital and transport connectivity infrastructure should be co-ordinated and planned on the basis of the whole region. The management of natural resources, flooding and the protection and enhancement of areas of environmental and landscape important should inform strategic decisions on locations for growth and new infrastructure.'



*Future Wales Spatial Strategy*

### *Relevant Policies to the proposals*

The following policies from Future Wales are deemed relevant to the proposals:

- Policy 1 (Where Wales will grow);
- Policy 7 (Delivering Affordable homes);
- Policy 8 (Flooding);
- Policy 9 (Resilient Ecological Networks and Green Infrastructure);
- Policy 11 (National Connectivity);
- Policy 12 (Regional Connectivity);
- Policy 13 (Supporting Digital Communications);
- Policy 15 (National Forest);
- Policy 33 (National Growth Area: Cardiff, Newport and The Valleys);

### ***Planning Policy Wales 11 (PPW 11)***

PPW 11 was adopted on the 24<sup>th</sup> February 2021 and sets out the land use policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs). The following policy and guidance from PPW11 are deemed to be of relevance to the proposals sought via this submission.

#### *Placemaking*

Paragraph 2.8 sets out the key drivers for placemaking, and states:

*"Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. 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."*

Paragraph 1.14 sets out The Well-being of Future Generation's Goals.



*The Well-being of Future Generation's Goals*

### *Creating Sustainable Places*

*Paragraph 2.3 states:*

*"The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all."*

Paragraph 2.6 states:

*"Sustainable placemaking is an inclusive process, involving all of those with a professional or personal interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places."*

### *People and Places – National Sustainable Placemaking Outcomes*

Paragraph 2.17 states:

*"In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver developments that address the national sustainable placemaking outcomes."*

### *National sustainable placemaking outcomes*

Figure 6 on page 20 outlines how PPW should be used to achieve sustainable places in diagram format:



PPW Figure 6

Paragraph 2.27 sets out how to assess the sustainable benefits of development:

*"Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle.*

*Key factors in the assessment process include:*

#### *Social Considerations*

- *Who are the interested and affected people and communities;*
- *How does the proposal change a persons way of life, which can include:*

- how people live, for example how they get around and access services;*
- how people work, for example access to adequate employment;*
- how people socialise, for example access to recreation activities; and – how people interact with one another on a daily basis*
- *Who will benefit and suffer any impacts from the proposal;*
- *What are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and*
- *How does the proposal support development of more equal and more cohesive communities.*

#### *Economic Considerations*

- *Whether, and how far, the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;*
- *The contribution the development would make to achieving wider strategies, for example the growth or regeneration of certain areas;*
- *The contribution this economic activity will have to wider policy goals; and*
- *How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales.*

#### *Cultural Considerations*

- *How far the proposal supports the conditions that allow for the use of the Welsh language;*
- *Whether or not the development protects areas and assets of cultural and historic significance;*
- *Have cultural considerations and their relationships with the tourism industry been appropriately maximised;*
- *If the proposal protects areas known for their cultural value in terms of music, literature, sport and the arts; and*
- *Vibrant cultural experiences.*

#### *Environmental Considerations*

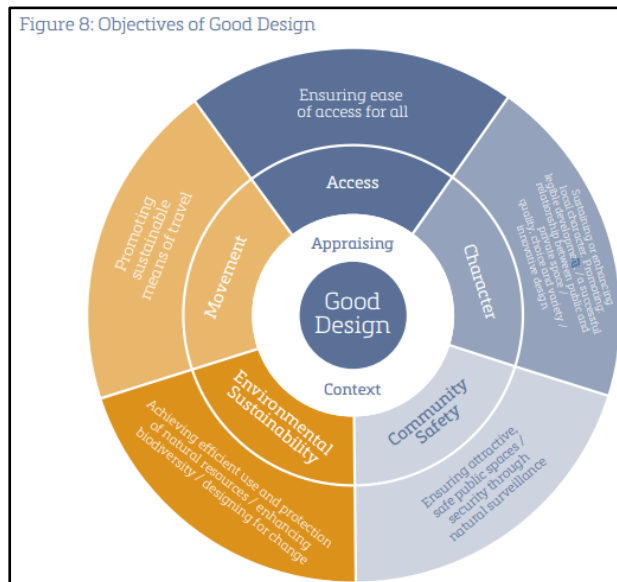
- *Will important features of the natural and built environment be protected and enhanced;*
- *Are the environmental impacts of development on health and amenity limited to acceptable levels and the resilience of ecosystems improved;*
- *Is environmental protection for people and natural resources, property and infrastructure maximised and environmental risks prevented or appropriately managed;*
- *Will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved;*
- *Will the depletion of non-renewable resources be minimised, waste prevented and the efficient and most appropriate use of materials made and re-use and recycling promoted;*
- *Will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and*
- *Does it support decarbonisation and the transition to a low carbon economy.*

### Good Design

Paragraph 3.3 states:

*"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, 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."*

Paragraph 3.4 sets out the above in an illustrative / diagrammatic manner.



Planning Policy Wales Figure 8

### Promoting Healthier Places

Paragraph 3.21 states:

*"Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider*

*the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor's surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused."*

Paragraph 3.22 states:

*"Planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio-economic groups, recognising that investment in walking and cycling infrastructure can be an effective preventative measure which reduces financial pressures on public services in the longer term. The way a development is laid out and arranged can influence people's behaviours and decisions and can provide effective mitigation against air and noise pollution. Incorporating drinking water fountains or refill stations for reusable bottles in public spaces is a simple and effective way of making places healthier and of reducing unnecessary waste. Effective planning can provide calming, tranquil surroundings as well as stimulating and sensory environments, both of these make an important contribution to successful places."*

### *Housing*

Paragraph 4.2.2 states:

*"The planning system must:*

- identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*
- focus on the delivery of the identified housing requirement and the related land supply.*

### *Affordable Housing*

Paragraph 4.2.25 states:

*"A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."*

## LOCAL PLANNING POLICY

### MCC LDP 2011-2021 (ADOPTED FEBRUARY 2014)

#### Key relevant planning policies (as defined by the existing Development Plan : MCC LDP)

##### Policy S1 – The Spatial Distribution of New Housing Provision

The main focus for new housing development is within or adjoining the Main Towns of:

- Abergavenny, Chepstow and Monmouth.

##### Policy S4 – Affordable Housing Provision

Provision will be made for around 960 affordable homes in the Local Development Plan Period 2011-2021. To meet this target, it will be expected that:

- In Main Towns and Rural Secondary Settlements as identified in Policy S1 development sites with a capacity for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 35% of the total number of dwellings on the site to be affordable.

##### Policy S7 – Infrastructure Provision

The infrastructure needed to service and deliver sustainable development must be in place or provided in phase with proposed development. Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided.

##### Policy 13 – 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.

#### Policy S16 – Transport

Where appropriate, all development proposals shall promote sustainable, safe forms of transport which reduce the need to travel, increase provision for walking and cycling and improve public transport provision.

#### Policy CRF2 – Outdoor Recreation / Public Open Space / Allotment Standards and Provision

Development proposals will be assessed against the Council's standards for recreation and open space and allotments, as follows:

Public recreation and open space:

- NPFA minimum standard for outdoor playing space of 2.4 hectares per 1,000 population and 0.4 hectares of public open space per 1,000 population, which are accessible to residential areas.

Allotments:

- Spatial standard of 0.25 hectares of allotment space per 1,000 population.

#### Policy SD2 – Sustainable Construction and Energy Efficiency

Proposals for low carbon design solutions in new buildings will be permitted in accordance with 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.

#### Policy SD4 – Sustainable Drainage

Development proposals will be expected to incorporate water management measures, including Sustainable Urban Drainage Systems (SUDS), to reduce surface water run-off and minimise its contribution to flood risk elsewhere.

#### 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.