

Heritage Assessment.

Land South of Monmouth Road, Raglan.

On behalf of Richborough Estates.

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1. Introduction

- 1.1. Pegasus Group have been commissioned by Richborough Estates to prepare a Heritage Assessment to consider the proposed allocation of land south of Monmouth Road, Raglan (CSO183), for residential development, as shown on the Site Location Plan provided at Plate 1.

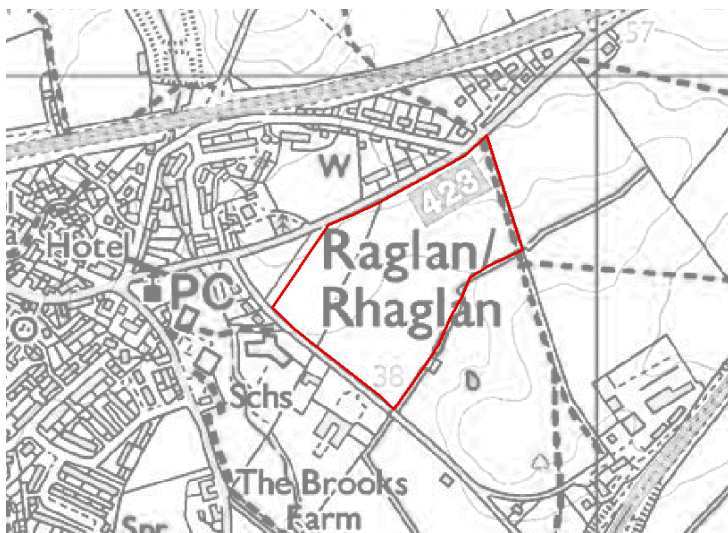


Plate 1: Site Location Plan

- 1.2. Internal heritage consultee comments from Monmouthshire County Council (dated 20th July 2022) state that, from a heritage perspective, the site is suitable to be developed for the proposed use and consider that no further survey or assessment works are required. These comments have specific regard to the Raglan Conservation Area, nearby Listed Buildings (especially within the historic settlement core of Raglan), and Raglan Castle. The heritage comments in relation to Raglan Castle were as follows:

“Close proximity to Raglan Castle SAM. Views to and from the castle are important to protect. However the topography of the site means that it has limited impact on the wider views of the Castle or those from the Castle into its open countryside setting.

Sufficiently far from and RP&G as not to have a detrimental impact on their setting.”

- 1.3. Comments have also been received from Cadw (May 2023) regarding the proposed allocation, as follows:

“The candidate site is located some 270m southeast of scheduled monument MM005 Raglan Castle and will be visible in the identified significant view from it, over its hunting parks. The impact of any development in this candidate site on the setting of the scheduled monument will therefore be a material consideration in the determination of any planning application (see Planning Policy Wales 2021, section 6.1.23). It may also be visible from PGW(Gt)42(MON) Raglan Castle registered historic park and garden also located some

270 m to the southeasteast. Thus before this candidate site can be considered for inclusion in the LDP the applicant should be requested to provide an assessment of the impact of development in this area on the settings of scheduled monument MM005 Raglan Castle and PGW(Gt)42(MON) Raglan Castle registered historic park and garden which should be prepared by a competent and qualified historic environment expert in accordance with the methodology outlined in the Welsh Government's best-practice guidance Setting of Historic Assets in Wales (2017).

Candidate site should not be included in LDP until the applicant has provided an assessment showing that development will not have a significant adverse impact on the settings of scheduled monument MM005 Raglan Castle and PGW(Gt)42(MON) Raglan Castle registered historic park and garden.

- 1.4. In response to the comments received from Cadw, the aims of this Assessment are:
- To describe the significance of Raglan Castle as a Scheduled Monument, Grade I Listed Building and Grade I Registered Historic Park and Garden, including the contribution of setting to significance;
 - To assess any contribution that the site makes to the significance of the historic assets comprising Raglan Castle through setting; and

- To identify any potential harm or benefit to the Raglan Castle historic assets that might result from residential development of the site.

- 1.5. Other historic assets in the vicinity of the site have been excluded from further assessment within this report but will be considered as part of any future planning application, in line with the objectives of *Planning Policy Wales* which state that:

"Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place."¹

- 1.6. This Assessment has been informed by the Welsh Government's Technical Advice Note 24 (TAN24), as well as relevant professional guidance published by Cadw.

2019 Appeal Decision

- 1.7. A previous planning application which sought outline planning permission for the residential development of the site to provide up to 111 dwellings was dismissed at appeal in 2019 (ref. APP/E6840/V/18/3218503; LPA ref. DM/2018/01050). Although relating to the same site, the scheme considered at the appeal was for a higher quantum of development.
- 1.8. In considering the effect of development on Raglan Castle, the Inspector concluded:

¹ Welsh Government, *Planning Policy Wales* (11th edition, February 2021), Section 6.1.9.

“100. ... the scheme would not harm the significance of the Castle. The visibility of the development from the Castle would be very limited given the screening effect of several areas of vegetation, supplemented by the scheme’s landscaping and the fact that the site falls away from the direction of the Castle. In the context of the panoramic view that is available over the village, I consider that the extension of the built form in a direction away from the Castle would not materially alter the relationship between the Castle and the village and its surrounding countryside.

101. Within parts of the site and its vicinity glimpses of the upper parts of the Castle are presently available, aided by the presence of an area of open space between the rows of houses on the north side of Monmouth Road. Given the intervening distance¹³, the presence of tall trees, and the prominence of some of the houses the views do not provide an appreciation of the scale or prominence of the Castle. The loss of

some of these restricted views would not affect the significance of the asset within its setting.”

- 1.9. The Inspector also had separate regard to the Grade I Registered Historic Park and Garden, concluding:

“103. At its closest point the designated Historic Park and Garden is estimated to be within 245m or so of the site. However, the extent to which buildings and significant lines of trees screen the site mean that there would be no material impact on this asset.”

- 1.10. In summary, the Inspector concluded that residential development could be achieved at the site with no harm being caused to the significance of the historic assets comprising Raglan Castle.

- 1.11. A full copy of the 2019 Inspector’s Decision is included at ***Appendix 1.***

2. Methodology

- 2.1. The aims of this Report are to assess the significance of the identified historic assets, to assess any contribution that the site makes to the significance of these assets through setting, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.
- 2.2. This assessment considers matters relating to the setting of historic assets.

Sources

- 2.3. The following key sources have been consulted as part of this assessment:
- Cadw data and information on designated historic assets;
 - The National Library of Wales, Aberystwyth, for historic maps, documents and documentary sources;
 - The Gwent Archives for additional historic maps, documents and documentary sources (remote search); and
 - Glamorgan-Gwent Archaeological Trust's Historic Environment Record (HER) for information on non-designated historic assets and previous archaeological works, accessed online via Archwilio;

- The Raglan Conservation Area Appraisal and Management Proposals;
- Relevant secondary literature;
- Google Earth satellite imagery; and
- LiDAR data for the site and its surrounds.

Site Visit

- 2.4. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 7th July 2023, during which the site and its surrounds were assessed.

Photographs

- 2.5. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of historic assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

- 2.6. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix**

2. However, for clarity, this methodology has been informed by the following:

- *Conservation Principles for the sustainable management of the historic environment in Wales (Conservation Principles)*;²
- *Heritage Impact Assessment in Wales*;³
- *Setting of Historic Assets in Wales*;⁴
- *Standard and Guidance for Historic Environment Desk-Based Assessment*;⁵ and
- *Technical Advice Note 24 (TAN24)*.⁶

Consideration of Harm

- 2.7. Planning Policy Wales (PPW11)⁷ requires that the potential impacts of a development on the significance of any historic asset(s) are assessed. Hence any impacts are described in terms of how they affect the significance of a historic asset, and heritage values that contribute to this significance, including any impacts resulting through changes to setting.
- 2.8. Proposed development may also result in benefits to historic assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

² Cadw, *Conservation Principles for the sustainable management of the historic environment in Wales* (2011).

³ Cadw, *Heritage Impact Assessment in Wales* (May 2017).

⁴ Cadw, *Setting of Historic Assets in Wales* (May 2017).

⁵ ClfA, *Standard and Guidance for Historic Environment Desk-Based Assessment* (December 2014).

⁶ Welsh Government, *Planning Policy Wales: Technical Advice Note 24: The Historic Environment* (May 2017).

⁷ Welsh Government, *Planning Policy Wales* (11th edition, February 2021), Section 6.1.

3. Policy Framework

Legislation

- 3.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.⁸
- 3.2. Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.⁹ Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.
- 3.3. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹⁰
- 3.4. Full details of the relevant legislation are provided in **Appendix 3**.

National Planning Policy Guidance

- 3.5. National planning policy is set out in Planning Policy Wales (PPW11). The latest (11th) edition was published in February 2021.
- 3.6. Full details of the relevant national policy guidance is provided within **Appendix 4**.

⁸ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁹ UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

¹⁰ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

4. Raglan Castle

- 4.1. Raglan Castle is designated as a Scheduled Monument and Grade I Listed Building and is located within the Raglan Castle Grade I Registered Historic Park and Garden (RPG). The castle is also located within the Raglan Conservation Area (not considered as part of this assessment).
- 4.2. A map showing the location of the designated historic assets in relation to the site is included at **Appendix 5**.
- 4.3. For concision, the castle is discussed as a single asset with its separate designations being considered in the assessment of significance below.

Historic Development

- 4.4. Raglan Castle is thought to have originated as a motte and bailey fortification in the 11th century (HER ref. GGAT00816);¹¹ however, the extant castle is essentially a 15th-century construction with 16th- and 17th-century alterations.
- 4.5. The 15th-century castle replaced an earlier manor house. It was designed as a 'fortress-cum-palace' to convey the wealth of its patron, Sir William ap Thomas, and to awe visitors.¹² After the death of Sir William ap Thomas, the building of Raglan Castle was continued by his son, Sir William Herbert, until 1469. William cemented the status

of Raglan Castle as a palatial residence which he used to protect, reinforce, and project his own position and that of the Yorkist regime (of which he was a supporter during the Wars of the Roses).¹³

- 4.6. In 1549 the castle was inherited by William the 3rd Earl of Worcester who largely rebuilt the hall and improved the service ranges. The gardens, which are still legible to some degree, were laid out between the mid-16th and the early part of the 17th century through the patronage of the 3rd and 4th Earls of Worcester. These innovations were influenced by Renaissance ideas that were filtering through to the English court from Italy and France, with the aim being to improve the comfort of the castle and reflect current fashion and social requirements.¹⁴
- 4.7. The castle was ultimately abandoned in 1646 after it was besieged and taken by Parliamentarian forces during the English Civil War. Prior to this, the fortifications were expanded with the addition of new earthworks beyond the main complex, possibly integrating timber and wicker breastworks. These were designed to accommodate heavy ordnance guns and assist in the defence of the castle. In the aftermath of the siege, parts of the castle were demolished, and lead and timbers were looted and transported to Monmouth.¹⁵ Building materials were salvaged from the castle over successive generations.

¹¹ J. R. Kenyon, *Raglan Castle* (revised edition, Cardiff, 2003), p. 3.

¹² *Ibid.*, p. 6.

¹³ *Ibid.*, pp. 9–11.

¹⁴ *Ibid.*, p. 14–18.

¹⁵ *Ibid.*, pp. 19–20.



Plate 2: General view of the gatehouse range.

- 4.8. Three former deer parks are associated with Raglan Castle. These are the 'upper park', the 'lower park' and 'Red Deer Park'. The upper park surrounded Raglan Castle. The lower park was located to the south. Red Deer Park is thought to have been located c. 3 miles north of Raglan Castle, towards Llantilio Crossenny.

Description

- 4.9. The 15th-century castle buildings are characterised by pale, almost yellow, sandstone from Redbrook in the Wye Valley, whereas the 16th-century additions tended to be built using local Old Red Sandstone which is red, brown or purplish in colour.¹⁶ Consequently, it is possible to differentiate the earliest fabric.
- 4.10. All the buildings that comprise the main castle complex are now in some form of ruinous state, though some are better preserved than others.
- 4.11. The gatehouse range, which was designed as the main entrance for visitors to the castle and can be largely attributed to William Herbert, occupies the south-east corner of the complex. As well as the gatehouse with its two half-hexagonal towers and double-arched bridge approach, it incorporates the Closet Tower on its easternmost side.
- 4.12. The Great Tower occupies the southernmost part of the complex and is the most imposing element of the castle. It principally comprises a hexagonal stone tower surrounded by an apron wall and moat. It was first built

by William ap Thomas and later remodelled by William Herbert.

- 4.13. To the north of the Great Tower, and at the centre of the complex, is the hall. This was largely rebuilt in the 16th century and incorporates a great oriel window and carved decoration, including a relief bearing the arms of the 3rd Earl of Worcester (positioned above the dais). Although now roofless, the residual corbels and wall post slots are indicative of the hall having formerly possessed a double hammer-beam roof.
- 4.14. The hall is flanked by the Pitched Stone Court to the north-east and the Fountain Court to the south-west. Both courtyards are surrounded by a variety of former ancillary buildings that historically served the daily needs of the castle occupants, including kitchens (located in the Kitchen Tower), a pantry and buttery, a chapel, and apartments accessed by the Grand Stair.

Setting, Approaches and Views

- 4.15. The gardens lie mainly to the south, south-west, west and north-west of the principal castle buildings. As noted above, these were laid out in the 16th and 17th centuries by the 3rd and 4th Earls of Worcester. A large amount of landscaping was needed for the creation of the series of terraces which lie to the north-west and south-west of the castle and to create sloping ground, with a large pool, known as the 'Great Poole', located adjacent to the north-west terraces. A curved and raised bowling green was laid out to the south of the castle, converted from the previous 'hornwork' in the 16th-century. The Moat Walk

¹⁶ Ibid., p. 44.

around the moat was formed in the late 16th to early 17th-century, and the formal water garden was also created around that time.

4.16. Within the wider setting of the castle, there are residual landscape features and recorded remains that illustrate historic activity associated with the castle. These include:

- Former medieval fishponds (HER refs. GGAT00798g & GGAT00815g);
- A rabbit warren (HER ref. GGAT04773g);
- Remains of Civil War siegeworks and 'Fairfax's Camp' (HER ref. GGAT00799g, GGAT00809g & GGAT00821g); and
- The three former deer parks (as described above).

4.17. The wider surrounds also include open countryside and the settlement of Raglan to the south.

4.18. Today, the main approach to Raglan Castle and the associated Historic Park and Garden is via the A40 and Castle Road from the south. The A40 is a modern dual carriageway. The principal castle buildings are accessed through the Cadw Visitor Centre, located on the south-east side of the complex, and then through the gatehouse which was the historically designed entrance for visitors. There are also approaches by public rights of way from the south, east and north-east.

4.19. Given the castle was principally designed in the 15th and 16th centuries to impress and awe visitors and to project the authority and status of its noble occupants, it was clearly intended to be highly visible from the surrounding landscape.

4.20. The *Raglan Conservation Area Appraisal* (January 2012) identifies views of the castle that are of 'very high significance', which can be summarised as follows:

- Views looking north from Monmouth Road;
- Views from the pasture field east of Hill House; and
- Views north along Castle Street.¹⁷

4.21. Today, views from Monmouth Road are heavily restricted by intervening vegetation and modern development, such that there are only glimpses from select vantage points.

4.22. The field east of Hill House is private land and was not accessible at the time of the site visit; however, given this field can be seen from high vantage points within the castle complex (see further discussion/illustration below), it can be deduced that there will be reciprocal views.

4.23. When looking north-east along Castle Street, there are barely perceptible, distant glimpses of the upper parts of the castle above the intervening tree line (Plate 3). Such glimpses are likely to be more open in the winter months when the intervening vegetation is not in leaf.

¹⁷ Monmouthshire County Council, *Raglan Conservation Area Appraisal and Management Proposals* (January 2012), p. 42.



Plate 3: North-east-facing view from Castle Street (adjacent to the junction with Primrose Green).

There is a distant glimpse of the upper parts of Raglan Castle (location marked with a yellow arrow).



Plate 4: South-west-facing view of Raglan Castle from the public right of way atop the former Civil War earthworks and adjacent to the modern reservoir.

- 4.24. Also of note are the views of the castle that are possible from the surrounding public footpaths. These include the vantage point from the former Civil War siegeworks north-east of the castle (now occupied by a reservoir) in which views oversail the intervening buildings of Castle Farm (Plate 4).
- 4.25. More generally, it should be noted that vegetation around the castle would have been carefully controlled historically, not least because of the major garden landscaping works of the 16th and 17th century, and the mature trees that have since seeded and grown in the immediate vicinity filter and screen visibility of the castle. Therefore, it is probable that the castle buildings were more visible from the surrounding landscape historically. Nonetheless, the castle remains a prominent local landmark that is visible from numerous locations.
- 4.26. From within the castle complex itself, there are expansive, panoramic views of the surrounding landscape from accessible high vantage points on the Great Tower and the South Gate (Plate 5 to Plate 8).
- 4.27. In north-west and south-west-facing views from the Great Tower (Plate 5 & Plate 8), views oversail the castle complex towards the wider landscape, including modern enclosed and amalgamated fields, with limited perception of surrounding built development.
- 4.28. North-east-facing views (Plate 6) contain the modern Visitor Centre and buildings of Castle Farm in the foreground, with fields, the A40 and modern residential development beyond.
- 4.29. To the south-east (Plate 7), there are distant glimpses of the modern expanded settlement of Raglan beyond the A40, but also buildings within the historic settlement core, most notably the tower of St Cadoc's Church.
- 4.30. Significant views from the RPG are identified in the designation description and illustrated on the Cadw website (Plate 9). These comprise:
- Outward views from the north-west terraces across the nearby countryside to the Black Mountains beyond, although visibility of the latter is constrained by the local topography (Plate 10); and
 - Outward views from the south-west towards the South Wales valleys (Plate 11).



Plate 5: North-west view from the Great Tower.



Plate 6: North-east view from the Great Tower.



Plate 7: South-east view from the Great Tower.



Plate 8: South-west view from the Great Tower.



Plate 9: Illustration of significant views (denoted with black arrows) from the Registered Historic Park and Garden.

Source: Cadw.



Plate 10: Significant north-west view from the Raglan Castle RPG.



Plate 11: Significant south-west view from the Raglan Castle RPG.

Significance

- 4.31. The Scheduled Monument and Grade I Listed Building principally derive their significance from their physical remains, comprising standing architectural fabric, earthworks and buried remains.
- 4.32. The Cadw Report for the Listed Building identifies the reason for designation as follows:
- “Listed Grade I as one of the last medieval castles to be built, of national architectural and historical importance.”***
- 4.33. The Cadw Report for the Scheduled Monument identifies the reason for designation as follows:
- “The monument is of national importance for its potential to enhance our knowledge of late medieval design and construction. The monument is well-preserved and an important relic of the medieval landscape. It retains significant archaeological potential, with a strong probability of the presence of both structural evidence and intact associated deposits.”***
- 4.34. In summary, Raglan Castle possesses a high level of historical value, with illustrative value being derived from its importance as a late medieval/Early Modern castle and associative value being derived from its connection to important historical figures and events. There is a high level of evidential value due to the quality (albeit ruinous state) of its standing fabric and the abundance of buried remains that can yield evidence about the past use of the complex and the early phases of the castle. The history of the castle is also well-attested in historic charters,

illustrations, maps and other documents, which augments this evidential value. There is also a high level of aesthetic value due to the visual prominence of the ruins and the fact that they have been admired and depicted by artists (for example, the late 17th-century painting by Thomas Smith).

- 4.35. The Grade I RPG principally derives significance from the physical remains and designed landscape features contained within its designation area, including the independently listed castle buildings described above.
- 4.36. The Cadw Report for the RPG identifies the reason for designation as follows:
- “It is registered as a very rare survival of an outstandingly important sixteenth- and early seventeenth-century garden layout which was one of the most advanced gardens of its date in the country. The gardens formed part of the setting for the castle which itself was built to be more decorative than defensive.”***
- 4.37. Consequently, the RPG possesses a high level of illustrative, associative, aesthetic and evidential value as a very important example of designed landscape that was commissioned by the Earls of Worcester in the 16th to 17th centuries, and remains very well preserved.
- 4.38. The setting of the historic assets also contributes to their significance, although the contribution through setting is less than that derived from the physical fabric, features and below-ground remains covered by the designations.

- 4.39. In the first instance, the association between the assets and their overlapping designations augments their significance (group value).
- 4.40. In the case of the Listed Building, the other elements and features that comprise the Scheduled Monument and RPG contribute most in terms of setting by illustrating the primary function of the castle complex as a palatial residence rather than a fortification, but also later adaptations that enabled it to be used defensively, especially during the English Civil War.
- 4.41. The topographic position of the castle is also an important part of its setting that contributes to its significance; it is situated within a valley formed by Barton Brook which would have supplied water to the castle but also affords views of the buildings from the surrounding valley slopes and high points. It therefore contributes to the historical and aesthetic values of the assets.
- 4.42. The setting of the Scheduled Monument and the RPG, and the wider setting of the Listed Building, includes Castle Farm which is thought to date from the 1640s and was designed to serve the castle in the final period of its occupation. It therefore contributes to the historical value of the asset.
- 4.43. The surrounding agricultural land principally comprises modern enclosed and amalgamated fields which is in arable and pastoral use. Although modern in character, this land gives a residual sense of the historic agricultural hinterland of the castle and the separation of the castle from nearby settlements, whilst the openness facilitates some important views of the castle from the wider landscape. It therefore makes some contribution to the historical and aesthetic values of the assets.
- 4.44. Elements of the modern agricultural landscape that surround the castle historically formed the associated deer parks; however, they have long-since been disimparked and the relationship is no longer readily legible (i.e. only with reference to historic documents). The contribution to the significance of the assets is therefore very minor at most.
- 4.45. The historic settlement core of Raglan to the south-west makes some contribution to the historical interest of the assets through setting due to proximity and intervisibility with the castle, and the fact that elements of its built form are (near-)contemporary with parts of the castle and probably associated through patronage.
- 4.46. With specific regard to views out from the castle and the significant views out from the RPG identified by Cadw, these give legibility to the positively contributing elements of setting described above and they provide an appreciation of the historic defensive capabilities of Raglan Castle. However, with regard to the last point, it should be emphasised that key views of the castle from the wider landscape are more important in terms of understanding how the castle were designed to inspire awe and project the power and authority of its occupants.

Any Contribution of the Site through Setting

- 4.47. The site comprises a single field parcel that is currently in arable use. It is bounded by hedgerows and trees. A public right of way runs through the easternmost part, parallel with the eastern site boundary.
- 4.48. The HER maps the lower deer park of Raglan Castle as extending across the southern area of the site (Plate 12). However, careful consideration of historic maps, and the 2005 landscape survey (HER ref. E005163), indicate that, in fact, the park only extended into the easternmost part of the site.
- 4.49. The approximate locations of the upper and lower deer parks are recorded on Speed's map of 1610 (Plate 13). These deer parks may have been established in the medieval period.
- 4.50. The site and surrounding area are depicted on the Laurence Smyth Map of Raglan Castle 1652 (Plate 14). The eastern area of the site is depicted within the lower deer park associated with the castle, while the majority of the site was located in an area labelled as 'Powell Land & Novis Meadow', a part of the castle estate.
- 4.51. The site is next depicted on the Plan from John Aram's Survey of Raglan Manor 1765 (Plate 15). At that time, the site comprised four agricultural field parcels. A building immediately west of the site is labelled as a Tithe Barn. Monmouth Road is sketched in, suggesting it was proposed or under construction.

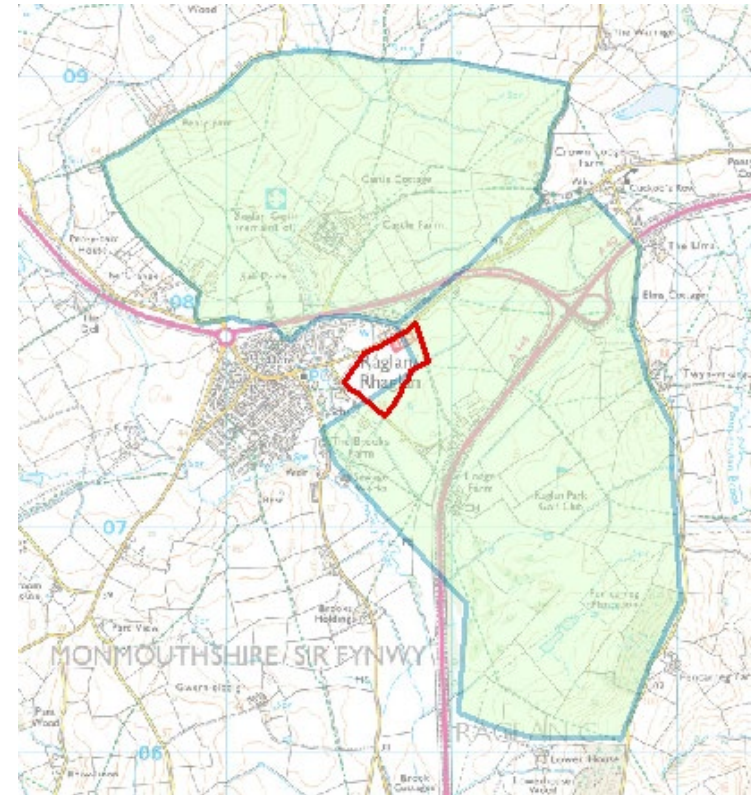


Plate 12: The upper and lower deer parks as recorded by the HER.



Plate 13: Extract from the John Speed Map of Monmouthshire 1610.



Plate 14: Extract from the Laurence Smythe Map of Raglan Castle 1652.



Plate 15: Extract from the Plan from John Aram's Survey of Raglan Manor 1765.

- 4.52. A similar situation is shown on the Tithe Map of 1843 (Plate 16). The site remained divided into several agricultural fields which, at the time of the Tithe Apportionment Register, were under the ownership of His Grace, The Duke of Beaufort, and under the occupancy of George Hallen. The Duke of Beaufort owned a large amount of land within the parish of Raglan, including Raglan Castle. The site contained a small building, most probably a field barn, within the central area. A new road (corresponding with present-day Monmouth Road) had been laid out parallel with the northern site boundary.



Plate 16: Extract from the Raglan Tithe Map of 1843.

- 4.53. The site is depicted on the First Edition Ordnance Survey Map of 1882 (Plate 17). There had been some removal of field boundaries such that the site then comprised two agricultural fields. The former park boundary was marked by a line of trees (this line is no longer extant and there are only two trees in this approximate location). Three footpaths/trackways are illustrated running through the site: one running north-south through the western part (no longer extant); a second bisecting the site east-west (no longer extant); and the third running parallel with the eastern boundary (still extant). Station Road to the west of the site had been established by that time. The small barn within the central area of the site had been demolished.

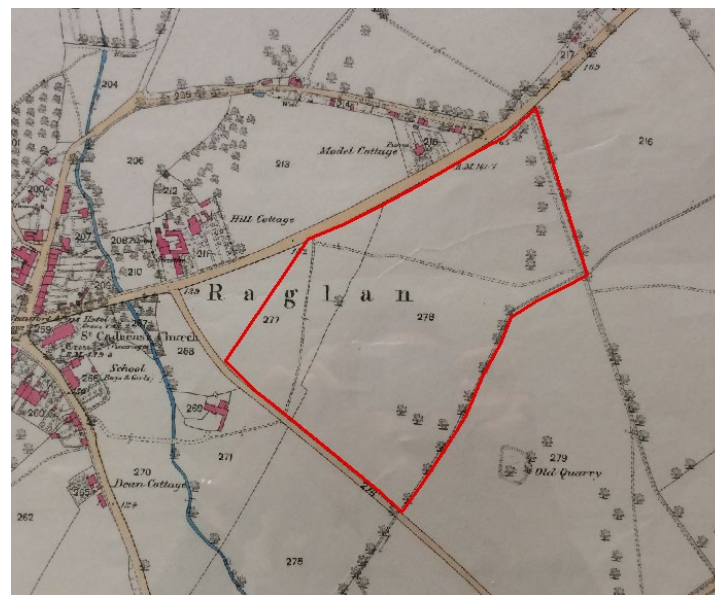


Plate 17: Extract from the First Edition Ordnance Survey Map of 1882.

- 4.54. No major changes are depicted on the Ordnance Survey Map of 1920 (Plate 18). The footpath/trackway that formerly ran through the western part of the site is not marked.

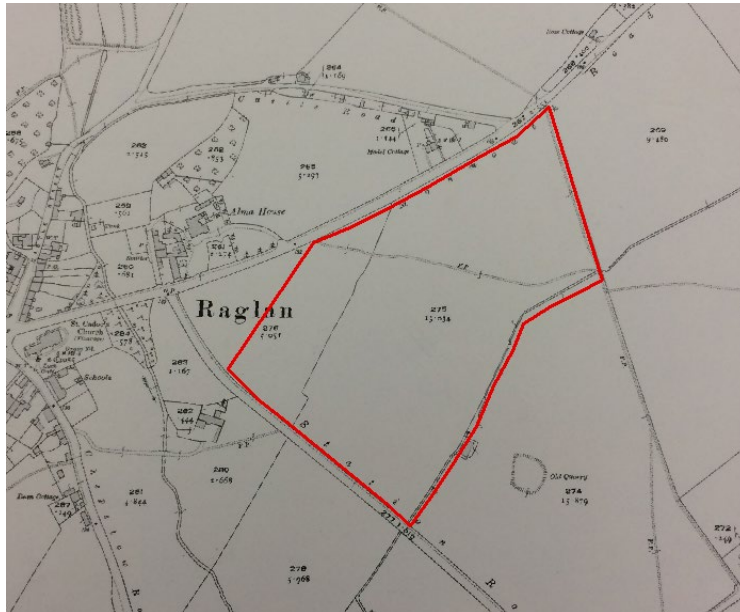


Plate 18: Extract from the Ordnance Survey Map of 1920.

- 4.55. As noted above, two trees within the eastern area of the site align with the former curved boundary of the lower deer park (Plate 19). No associated earthwork was discernable at the time of the site visit. However, manipulated and exaggerated LiDAR data indicates a very slight variation in ground level which aligns with the line of the former park boundary (Plate 20).



Plate 19: North-west-facing view from the eastern corner of the site.

The two trees which align with the former boundary of the deer park are visible centre and left of frame.

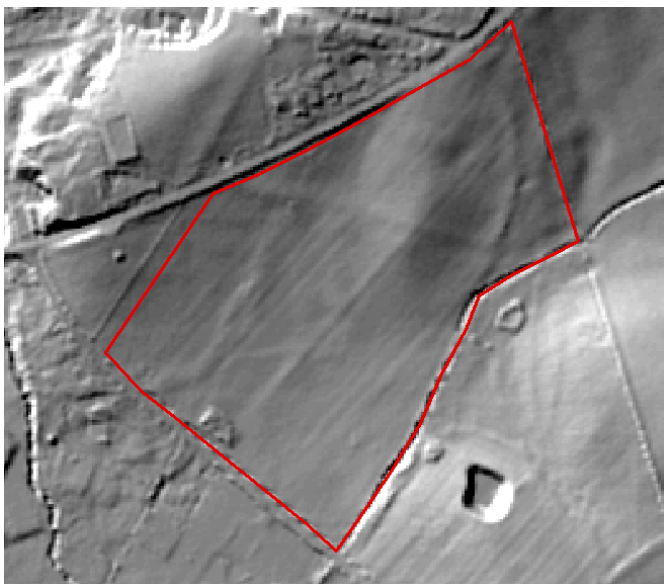


Plate 20: Extract from the LiDAR data.

- 4.56. Consequently, although a historic association existed between the site and Raglan Castle, this is no longer tangible and is only legible based on historic sources. Furthermore, modern highways (the A40 and Monmouth Road) have severed the castle from its historically associated landholdings to the south (including the site).
- 4.57. There is no evidence that the site ever formed part of a designed approach to Raglan Castle. Footpaths/trackways are not depicted within the site on the earliest cartographic sources. The same sources illustrate that Monmouth Road (bounding the site to the north) had not been established until the mid-19th

century and Station Road (bounding the site to the west) had not been laid out until the later 19th century date.

- 4.58. The Raglan Conservation Area Appraisal describes ‘very high significance’ views of Raglan Castle from Monmouth Road;¹⁸ however, as noted above, views from Monmouth Road today are heavily restricted by intervening vegetation and modern development, such that there are only glimpses from select vantage points. In these views, the site is to the back of the viewer.
- 4.59. Plan 4 ‘Spatial Analysis/Townscape’ in the appendices of the Conservation Area Appraisal suggests the castle is visible from the northern edge of the site (Plate 21); however, this was not the case at the time of the site visit due to the screening effect intervening vegetation and modern development.
- 4.60. From other parts of the site, there are no clear, open views towards Raglan Castle, and no views were possible from the public right of way. Heavily filtered and barely perceptible glimpses of the uppermost part of the Great Tower were possible from select vantage points in the south-western part of the site (Plate 22). Otherwise, the castle was screened from view by intervening vegetation and modern development. While there may be slightly more visibility of the castle in winter months, in the context of views to the castle from other parts of the wider landscape, including from the main approaches to Raglan, the glimpses from the site do not equate to key views in terms of appreciation of the castle from the wider landscape.

¹⁸ Monmouthshire County Council, *Raglan Conservation Area Appraisal*, p. 42.

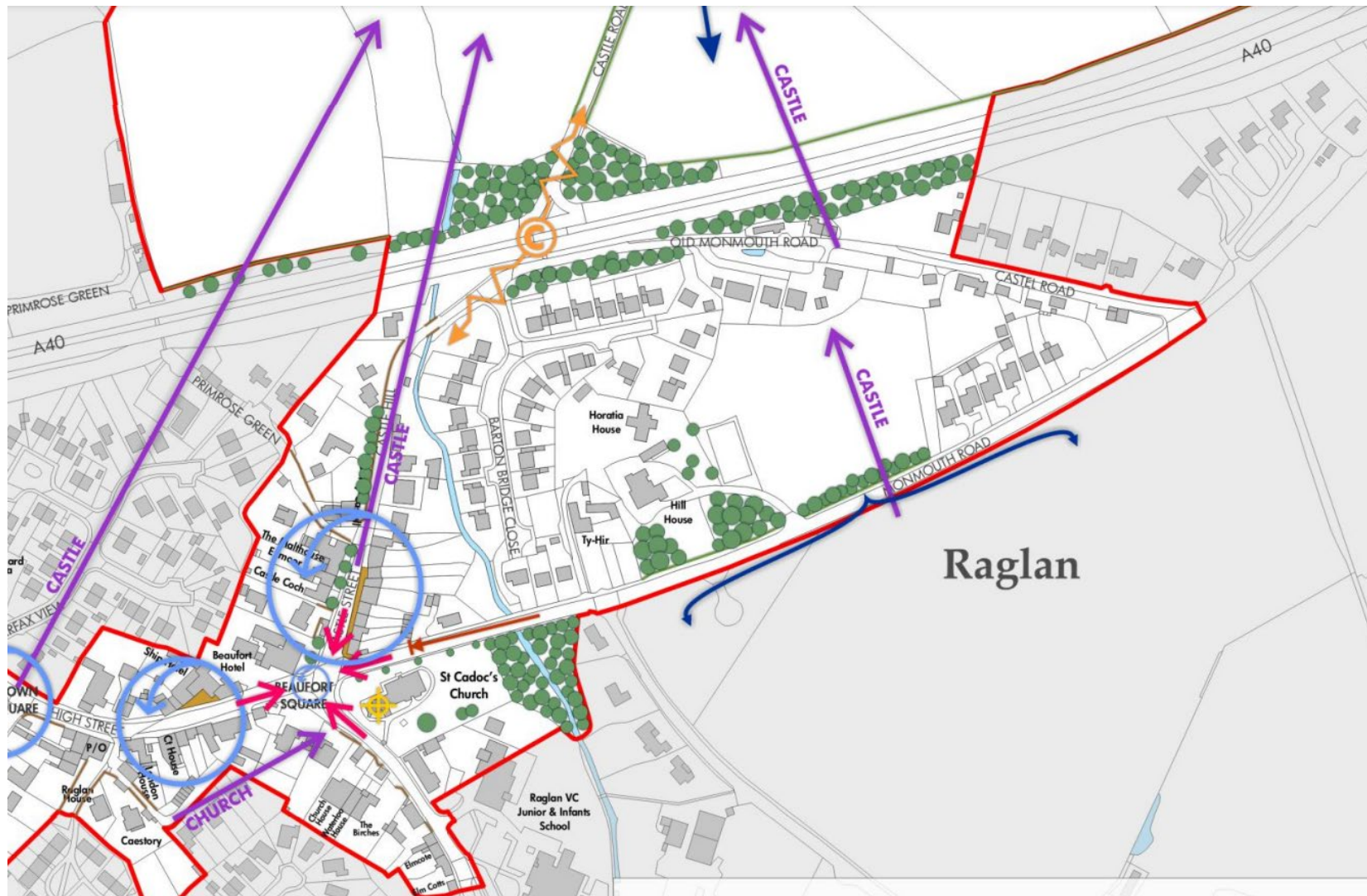


Plate 21: Extract of Spatial Analysis/Townscape from the Raglan Conservation Area Appraisal (Plan 4).



Plate 22: North-facing view from the south-west edge of the site.

There is a distant and heavily filtered glimpse of the uppermost part of the Great Tower of Raglan Castle (location marked with a yellow arrow).



Plate 23: North-facing view from the public right of way in the field to the south of the site.

This view oversails the site and there are heavily filtered glimpses of the uppermost parts of Raglan Castle in the distance (location marked with a yellow arrow).

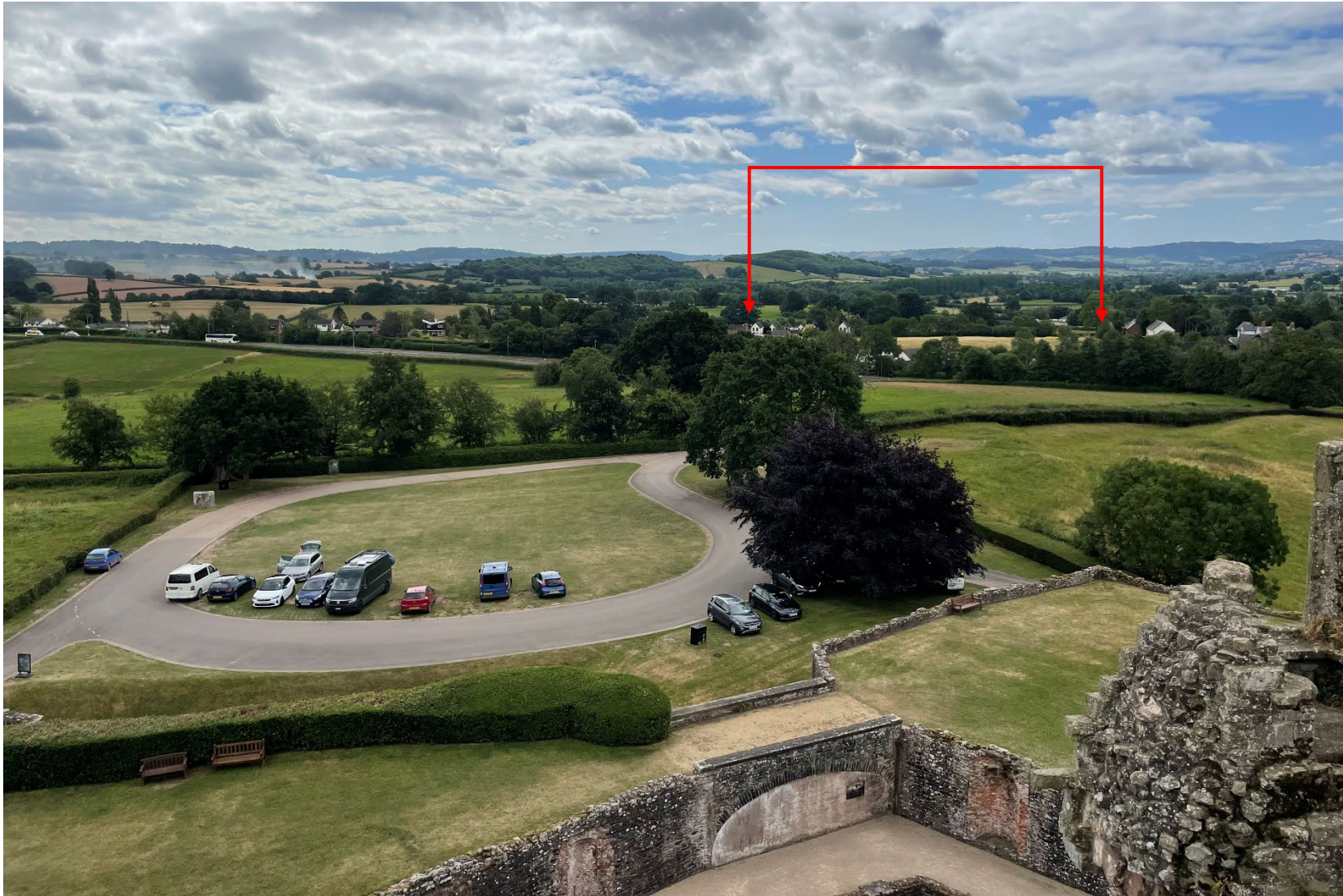


Plate 24: South-east-facing view from the Great Tower of Raglan Castle.

The approximate location of the site is marked with red arrows.

- 4.61. The public footpath that extends through the eastern edge of the site continues into the field to the south. Here, the ground rises such that views oversail the site and from select vantage points there are heavily filtered glimpses of the uppermost parts of Raglan Castle (Plate 23). These glimpses contain intervening modern residential development along the north side of Monmouth Road which further restrict visibility of the castle. As per the restricted glimpses from within the site, these equate to incidental rather than key views of Raglan Castle.
- 4.62. Views in the direction of the site from the grounds surrounding Raglan Castle are screened by intervening built form and tree belts. Furthermore, the significant views identified in relation to the Grade I Registered RPG are to the north-west and south-west and not in the direction of the site (which lies south-south-east).
- 4.63. In the far-reaching, south-east-facing view from the Great Tower, the site is largely screened by intervening tree belts, hedgerows and modern development (Plate 24). This view already contains modern development beyond the immediate grounds of the castle and the A40. Furthermore, in this same view the site is not legible as a former deer park, rather the general area that formerly comprised the lower park appears as the wider, enclosed agricultural landscape, crossed by modern infrastructure.
- 4.64. In the context of the wider, panoramic views that are possible from the Great Tower, the site forms an exceptionally small part and is not the focus of key views. Views in other directions are more important because they contain the historic settlement core of Raglan and

broader swathes of agricultural land that have been less interrupted by modern development.

- 4.65. At the very most, the easternmost part of the site makes a very small contribution to the significance of the assets comprising Raglan Castle through setting because it was historically part of the associated lower park and remains undeveloped green space, albeit now possessing an agricultural character and function rather than that of a deer park.
- 4.66. The remainder of the site is not considered to contribute to the significance of the assets comprising Raglan Castle for the following reasons:
- Any historic relationship between Raglan Castle and the site has long-since been severed and is not legible.
 - The site possesses the character of a modern enclosed and amalgamated arable field rather than a fossilised element of the medieval/Early Modern landscape.
 - The site does not form the content of any identified key (or 'significant') views from or towards the castle.
 - In the select, incidental views of the castle that are possible from within and over the site, the castle is heavily filtered by intervening vegetation such that it is barely perceptible, and it is seen in conjunction with intervening modern development.
 - In views towards the site from the Great Tower, the site is largely screened and visually severed from the

castle by intervening development, including the A40 dual carriageway.

Assessment of Potential Impacts

- 4.67. Two options are proposed for the residential development of the site (see **Appendix 7**). Option 1 seeks the allocation of the site to provide approximately 85 dwellings, whilst Option 2 proposes the allocation of only the western part of the site to provide approximately 54 dwellings, with potential to allocate the remainder of the site for approximately 46 dwellings as part of a future plan.
- 4.68. As part of both options, the easternmost part of the site (i.e. that which historically formed part of the lower park and is considered to make a very small contribution to the significance of the assets through setting) would be preserved as undeveloped green space. The line of the historic park boundary will be respected and the residual trees that follow this alignment will be retained. Therefore, there would be no harm to the significance of the assets through change to setting.
- 4.69. Given select heavily filtered glimpses of the castle from within the site are incidental rather than key views, interruption of these views by new development would cause no harm to the significance of the assets.
- 4.70. From the field and public right of way to the south of the site, it is anticipated that incidental glimpses of the castle will oversail the new development such that the castle will remain visible beyond intervening modern development. However, preserving the significance of the assets is not contingent on protecting these heavily filtered incidental glimpses.

- 4.71. The proposed development will not physically impact the historic assets associated with Raglan Castle and it will not impede or interrupt significant views looking south-west/north-west from the RPG.
- 4.72. The development will alter the character of agricultural land within the wider setting of the castle, with potential for this to be experienced in south-east-facing views from the Great Tower. However, the current illustrative proposals indicate new built form will be appropriately scaled (not exceeding two storeys) such that it is anticipated development would be largely screened by intervening vegetation and built form, as well as retained and augmented planting along the northern site boundary. Ultimately, any experience of new development from the Great Tower would sustain the character of the area south of the A40 (i.e. a mix of agricultural land and built form), it would blend with the modern expanded settlement edge of Raglan (the illustrative proposals are for locally inspired housing designs), and, in the context of wider views, the change would be negligible.
- 4.73. In summary, it is anticipated that residential development of the site could be delivered and cause no harm to the significance of the historic assets comprising Raglan Castle through change to their settings.

2019 Inspector's Decision and 2022 Heritage Assessment from Monmouthshire County Council

- 4.74. Both options propose a reduced quantum of development compared to the 2018 scheme which sought outline planning permission for up to 111 dwellings (LPA ref. DM/2018/01050).
- 4.75. This larger scheme was considered by the 2019 Inspector who concluded that the then-proposed development of the site would cause no harm to the significance of the assets comprising Raglan Castle through change to their settings.
- 4.76. Specifically, the Inspector noted:

"100. ... The visibility of the development from the Castle would be very limited given the screening effect of several areas of vegetation, supplemented by the scheme's landscaping and the fact that the site falls away from the direction of the Castle. In the context of the panoramic view that is available over the village, I consider that the extension of the built form in a direction away from the Castle would not materially alter the relationship between the Castle and the village and its surrounding countryside.

101. Within parts of the site and its vicinity glimpses of the upper parts of the Castle are presently available, aided by the presence of an area of open space between the rows of houses on the north side of Monmouth Road. Given the intervening distance¹³, the presence of tall trees, and the prominence of some of the houses the views do not provide an appreciation of the scale or prominence of the Castle. The loss of

some of these restricted views would not affect the significance of the asset within its setting."

- 4.77. Since the Inspector's decision was issued, there have been no material changes to legislation or policy, therefore the conclusions remain applicable to the site. Moreover, it should be reiterated that a reduced quantum of development is now proposed and compared to the previous masterplan the easternmost part of the site would similarly be preserved as undeveloped green space (cf. Plate 25).



Plate 25: Extract of Illustrative Masterplan for LPA ref. DM/2018/01050.

- 4.78. The recent heritage assessment of the site conducted by the heritage consultee for Monmouthshire County Council (dated 20th July 2022) considered the potential impact of development on the significance of the assets comprising Raglan Castle as follows:

“... This part of the conservation area has key views towards the castle mainly along the Monmouth Road looking north, these views will not be affected by the development. Views from the castle looking south will still be maintained and the GI landscape plan shows key areas of landscaping to soften this edges of the site helping it be integrated to the wider landscape. In addition there is also plating within the site again mitigating the effects. The retention of the two key trees in the site is also welcomed.

...

Close proximity to Raglan Castle SAM. Views to and from the castle are important to protect. However the topography of the site means that it has limited

impact on the wider views of the Castle or those from the Castle into its open countryside setting.

Sufficiently far from and RP&G as not to have a detrimental impact on their setting.”

- 4.79. The consultee ultimately concluded that from a heritage perspective the site is suitable to be developed for the proposed use.

Summary

- 4.80. Based on a thorough independent assessment, and in line with the 2019 Inspector’s decision and recent comments from the heritage consultee for Monmouthshire County Council, it has been demonstrated that the historic assets comprising Raglan Castle do not pose a constraint to the deliverability of residential development within the site.



Appendix 1: 2019 Appeal Decision

Adroddiad

Gwrandawriad a gynhaliwyd ar 05/06/19

Ymweliad safle a wnaed ar 05/06/19

**gan Hywel Wyn Jones BA(Hons)
BTP MRTPI**

**Arolygydd a benodir gan Weinidogion
Cymru**

Dyddiad: 31/07/2019

Report

Hearing Held on 05/06/19

Site visit made on 05/06/19

**by Hywel Wyn Jones BA(Hons) BTP
MRTPI**

**an Inspector appointed by the Welsh
Ministers**

Date: 31/07/2019

TOWN AND COUNTRY PLANNING ACT 1990 - Section 77

APPLICATION BY RICHBOROUGH ESTATES

LOCAL PLANNING AUTHORITY: MONMOUTHSHIRE COUNTY COUNCIL

Outline application for residential development of up to 111 dwellings, new vehicular access from Monmouth Road and emergency vehicle access to Station Road, public open space and associated landscaping, engineering and infrastructure works

Land to the south of Monmouth Road, Raglan

File Ref: APP/E6840/V/18/3218503

Site address: Land south of Monmouth Road, Raglan

- The application was called in for decision by the Cabinet Secretary for Energy, Planning and Rural Affairs for the Welsh Ministers, made under section 77 of the Town and Country Planning Act 1990, on 12 December 2018.
- The application is made by Richborough Estates to Monmouthshire County Council.
- The application, ref: DM/2018/01050 is dated 25 June 2018.
- The development proposed is residential development of up to 111 dwellings, new vehicular access from Monmouth Road and emergency vehicle access to Station Road, public open space and associated landscaping, engineering and infrastructure works.
- The reason for making the direction was that the application does not clearly demonstrate whether the development proposal has appropriately taken into account the transport hierarchy in relation to new development including the opportunities to promote active travel journeys and secure new and improved active travel routes and related facilities.
- On the information available at the time of making the direction, the following were the matters on which the Welsh Ministers particularly wished to be informed for the purpose of their consideration of the application:
 1. The application of the transport hierarchy in relation to new development as advocated in Planning Policy Wales (Edition 10, December 2018) (PPW).
 2. The appropriateness of new housing on a greenfield site outside the settlement boundary, having regard to local and national planning policies.

Summary of Recommendation: That the application is refused.

Procedural Matters

1. The application seeks outline permission with all matters, save for the means of access onto Monmouth Road, reserved for future consideration.
2. In advance of the call-in direction the Council's planning committee had resolved on 6 November 2018 to approve the application. The application was re-considered by the committee on 19 March 2019 in response to inaccuracies in the housing supply figures included in the original committee report and to consider any implications arising from the publication of the sustainable transport hierarchy in Planning Policy Wales, Edition 10 since the previous committee meeting. It was resolved to confirm that the committee would have resolved to approve the application had it retained jurisdiction.
3. Having regard to the Town and Country Planning (Environmental Impact Assessment (EIA)) (Amendment) (Wales) Regulations 2017, in a letter dated 10 January 2019 Welsh Government confirmed that the project is not EIA development within the meaning of those Regulations.
4. I undertook a visit to the site and its immediate surroundings on 5 June accompanied by representatives of both main parties and other interested parties, and on the previous day I visited the surrounding area unaccompanied.
5. In accordance with the approach explained at the hearing I agreed to adjourn the event to enable the main parties to prepare a final version of suggested conditions and a Deed of Variation to the previously submitted unilateral undertaking (UU). On receipt of these documents the hearing was closed in writing on 19 June 2019.

The Site and Surroundings

6. The site, which extends to some 7.71 ha, is a single field of semi-improved grassland located on the east of Raglan village. It is bounded to the north by

Monmouth Road and by Station Road to the west save for a small parcel of land adjacent to the junction which is a relatively recent addition to the nearby Church cemetery. In other directions the site bounds open fields.

7. The built-up area of Raglan lies to the north, and more particularly to the west. Outside the development boundary of the village, the nearby land is characterised by open fields with sporadic buildings, mainly of agricultural or residential character. There is also a recently constructed primary school, a dwelling and a nursery that lie directly to the west of the application site, outside the settlement boundary, and to the south of the site separated by a large field lies a Council depot. The site is enclosed by mature hedgerows for almost all its length. Within the field and along sections of the boundary there are veteran trees the subject of a tree preservation order (TPO). The site slopes down by some 12m southwards. A locally popular section of a public footpath crosses the site adjacent to its eastern boundary.
8. There are some 549 dwellings within the village. Raglan Conservation Area is located to the north of Monmouth Road. Raglan Castle, a Grade I Listed Building and Scheduled Monument and its Grade I Registered Park are located to the north of the site, on the other side of the A40 road. To the west of the site lies Raglan Church, a Grade II* listed building, which lies within the village centre.
9. The village provides a range of facilities, including shops, public houses, restaurants and takeaways, post office, doctor's surgery and pharmacy, garage and petrol filling station, places of worship and playing fields.¹ There are several other employment uses nearby, including small industrial/business parks. There are bus stops on Monmouth Road which connect to Newport, Monmouth and Abergavenny. The nearest railway station is Abergavenny (8.5 miles or so).

Planning Policy

Local policy and guidance

Local Development Plan

10. The Monmouthshire Local Development Plan (LDP) was adopted in 2014 and covers the period to 2021. The site lies outside the defined settlement boundary which is demarcated by Monmouth Road on the site's northern boundary and a section of Station Road on the western side. Policy S1 identifies Raglan as a Rural Secondary Settlement which is suitable for a "small amount of new housing development". It, and policy LC1, restrict development outside development boundaries to specific types of housing none of which apply in this case.
11. Policy S2 explains that the Plan makes provision for some 4,950 dwellings to be built which includes a 10% flexibility allowance to enable the target of 4,500 units to be met by the end of the Plan period. A total of 75 dwellings are identified for Raglan, comprising commitments, windfalls and allocations.
12. Policy S4 sets an affordable housing target of 960 units and identifies the relevant on-site affordable housing contribution expectation as 35% of the total units. S7 requires the provision of necessary infrastructure and deals with related developer contributions. S12 requires sustainable and efficient resource

¹ Paragraph 2.13 of the applicant's Statement of Case provides a detailed list of facilities and distances from the site

use and S13 deals with landscape, green infrastructure and environment considerations, including requirements to preserve local distinctiveness, sense of place and setting, and protecting existing key landscape views and vistas. S17 relates to placemaking, requires development to be of high quality and to respect its surroundings. LC5 seeks to protect and enhance landscape character, permitting development that would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects.

13. CRF2 sets open space and recreation standards. SD4 sets an expectation for the use of Sustainable Drainage Systems (SuDS) and GI1 provides an expectation for green infrastructure. The protection of biodiversity is dealt with by NE1.
14. Policy S16 requires that, where possible, all development proposals promote sustainable transport which reduces the need to travel, especially by car. MV1 seeks to ensure that schemes include measures to improve access by public transport, walking, cycling and reducing car journeys, MV2 encourages sustainable transport links, including public transport, walking and cycling.
15. HE1, requires development proposals in conservation areas to have regard to the conservation area appraisal for that area and will be permitted if they preserve or enhance the character or appearance of the area or its landscape setting and have no serious adverse effect on significant views into and out of the conservation area. In terms of other historic assets, the LDP relies on national policy and advice.

Emerging LDP

16. The Council has commenced preparation of a replacement LDP. The application site was proposed as part of the first tranche of candidate sites. It is proposed to consult on a Preferred Strategy in autumn 2019 with plan adoption anticipated in late 2021/early 2022.
17. The Council considers no weight should be afforded to the emerging Plan until its adoption, other than to the extent that it identifies a direction of travel for new policy. It also suggests that there is a time lag after adoption before the first of the housing allocations are developed which, based on experience, it estimates to be some 2 years.

Supplementary Planning Guidance

18. The most relevant of the Council's Supplementary Planning Guidance (SPG) documents are Affordable Housing (2016) and Green Infrastructure (2015). At the hearing it was confirmed that the Raglan Conservation Area Appraisal & Management Proposals was adopted in March 2016 as SPG following public consultation. I have also taken account of the Draft Interim Policy Guidance Approach to Planning Obligations - Residential Development which the Council produced in November 2017. As it is a draft document which has not been the subject of public consultation it carries limited weight, but it usefully sets out the Council approach and is not disputed.

Unallocated Sites 'Protocol'

19. A Full Council meeting on 20 September 2018 endorsed a report entitled 'Addressing our lack of 5 year land supply: Monmouthshire's Approach to Unallocated Sites', which I shall refer to as the 'Protocol'. The Raglan Village

Action Group (RVAG) subsequently pointed out inaccuracies in the report on which that decision was based. In response the matter was re-presented to Council on 21 February 2019 with corrected figures when it was resolved to confirm the approach in the Protocol. Based on the latest LDP Annual Monitoring Report the Council predicts that the housing supply target of 4,500 will be missed by some 504 units, of which 38 will be affordable houses (compared to a target of 960 units). The Council deems this shortfall to have such serious undesirable consequences as to require its intervention sooner than could be achieved by the adoption of the replacement Plan.

20. Objectors point out that the Council's consideration of the Protocol has not been informed by any public consultation exercise. The Council has confirmed that it is satisfied that its approach did not require a Strategic Environmental Assessment, drawing parallels to the effect of the, now disappplied, paragraph 6.2 of Technical Advice Note 1: Joint Housing Availability Studies.
21. The Protocol explains that it has been produced in response to 3 matters: the identified shortfall in relation to the Council's 5 year housing land supply (HLS); the social, economic and demographic challenges facing Monmouthshire's communities, in particular demographic imbalance, weak economic base and growing challenges regarding housing affordability; and the identified failure to meet the LDP delivery targets of market and affordable housing by the expiration of the Plan in December 2021.
22. It is intended to provide a framework for dealing with housing planning applications in the context of a failure to demonstrate a 5 year HLS. It has been presented as a means of, firstly, encouraging the release of suitable sites for housing over and above the opportunities in the LDP in order to plug an identified shortfall. This approach was adopted by the Council in response to the decision of the Cabinet Secretary to disapply paragraph 6.2 of TAN1 in her letter dated 18 July 2018. The Council specifically refers to the letter's reference to the weight to give housing supply shortfall as a matter for the decision maker.
23. Secondly, the Protocol seeks to provide clarity to developers and local communities on the circumstances when the lack of a housing supply does not justify permitting schemes that are outside the scope of the LDP. It does this by identifying 11 ground rules² which can be summarised as:
 - 1) Greenfield sites should be outside a floodplain³ ;
 - 2) Site not to be within designated Green Wedges;
 - 3) Site not to be within employment allocations;
 - 4) Site must provide 35% affordable housing;
 - 5) Development to be acceptable in other planning terms;
 - 6) Scale of development, and other approved development, to be considered in the context of the LDP strategy;

² Appendix B to Council's Statement of Case

³ Zones C1 and C2 as defined in TAN15

- 7) Development to be restricted to the Main Towns, Severnside, and Rural Secondary Settlements;
 - 8) Size and mix of the proposed dwellings is both suitable for the location and seeks to address demographic challenges;
 - 9) Any planning permissions to have a reduced lifespan;
 - 10) Applications to be accompanied by UU at time of Committee consideration; and
 - 11) The Protocol ceases to have effect should a 5 year land supply be regained and/or the LDP housing shortfall is met.
24. The protocol indicates that it should be afforded 'appropriate weight' in determining applications for new housing. It explains that the term 'appropriate weight' allows a degree of flexibility by location, having regard to the LDP spatial strategy and settlement character, with weight decreasing as the housing shortfall is addressed.
25. At the hearing the meaning of the term 'appropriate weight' was explored. The Council explained that the phrase was introduced by the planning committee who considered that the suggested phrase 'considerable weight' was too inflexible. It was accepted that the Protocol does not seek to provide specific guidance on how weight should be apportioned.

National policy and advice

26. Planning Policy Wales, Edition 10 seeks to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. It provides a presumption in favour of sustainable development that ensures social, economic, cultural and environmental issues are balanced by the decision-taker in making decisions on individual planning applications and emphasises the importance of placemaking.
27. Where there is a need for sites, but there is no previously developed land or underutilised sites, consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements⁴. It supports objectives of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport.⁵ Section 4 sets out the Sustainable Transport Hierarchy and notes that different approaches to this will be required in different areas, particularly rural areas. As an example it explains that where a local authority is seeking to grow a rural village it could focus on how the design and location of development would encourage walking and cycling to the village centre, thereafter considering bus services and improving facilities for Ultra Low Emission Vehicles (ULEV).
28. Paragraph 4.2.15 establishes that planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year

⁴ PPW, para 3.40

⁵ PPW, para 3.45

supply of land for housing judged against the general objectives, scale and location of development required in the development plan.

29. Section 5 deals with the economic components of placemaking, including access for communities to fulfilling work which is easily reached locally through sustainable transportation infrastructure. Section 6 addresses the long-term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments. This includes the general presumption in favour of the preservation or enhancement of a listed building and/or conservation area and their setting.
30. Supporting the provisions of PPW there are a suite of relevant Technical Advice Notes (TANs) that are relevant, in particular: TAN1 – Joint Housing Availability Studies (2015); TAN2 – Planning and Affordable Housing (2006); TAN5 – Nature Conservation and Planning (2009); TAN10 – Tree Preservation Orders (1997); TAN11 – Noise (1997); TAN12 – Design (2016); TAN15 – Development and Flood Risk (2004); TAN16 – Sport, Recreation and Open Space (2009); TAN18 – Transport (2007); and TAN24 – The Historic Environment (2017)⁶.
31. As already mentioned, a Ministerial letter of particular relevance is that from the Cabinet Secretary for Energy, Planning and Rural Affairs to Chief Planning Officers dated 18 July 2018 which dis-applied paragraph 6.2 of TAN1. This removes a paragraph which refers to attaching 'considerable' weight to the lack of a 5-year housing land supply as a material consideration in determining planning applications for housing. The letter confirms that as a result of the dis-application of paragraph 6.2, it will be a matter for decision makers to determine the weight to be attributed to the need to increase housing land supply where a local planning authority has a shortfall in its housing land.

The Proposals

32. The scheme seeks outline permission for up to 111 dwellings that is envisaged to comprise a range of 1 to 4 bedroom dwellings between 1 and 2 storeys in height and would include 35% affordable housing (up to 39 units). The main access would be onto Monmouth Road. A second vehicular access for use only by the emergency services is proposed onto Station Road which would also provide unrestricted pedestrian and cycle access.
33. The scheme proposes Green Infrastructure including extensive landscaping areas, open recreational areas (which would extend over some 48% of the site) and footpaths within the site and improvements to footway provision connections nearby. Other than for access requirements the existing hedges would be retained. One dead tree would be removed because of its unsafe condition, all others would be retained and safeguarded. Measures to protect and enhance ecological features and to dispose of surface water by SuDS are proposed. Each dwelling would be served by broadband connections that would provide significantly faster speeds than currently available in the locality. Each dwelling would have its own electric car charging facility.
34. The application has been supported by numerous documents including technical reports on ecology, heritage assets, highways and transportation, landscape, noise, and flooding.

⁶ Best practice guides have been produced by Cadw to complement TAN24

The Case for Richborough Estates

35. The applicant's case is set out in its Planning Statement and other documents that accompanied the planning application, and its subsequent Statement of Case and in Final Comments. The latter document includes rebuttal comments and technical appendices in relation to the objections received in response to the publicity related to the call-in procedure.

Transport Hierarchy

36. Raglan is set in a rural context (roughly equidistant between two principal towns), although in itself is a thriving place with a wide range of day to day facilities and connections. The proposed development also brings with it opportunities to make Raglan more sustainable as a settlement.
37. The scheme has been carefully designed, in close working with Council officers, to maximise opportunities for sustainable modes of transport to take advantage of the range of services and facilities that are offered within the village as well as the linkages via bus service to larger settlements. These measures include the layout of the scheme and also measures proposed through the UU that would not only serve prospective residents of the site but also existing village residents. The suite of financial contributions to improve connectivity and accessibility total £150,000.
38. Following the introduction of the latest version of the Transport Hierarchy in PPW Edition 10, which was published after the application was lodged, the scheme has been refined to ensure consistency with this latest iteration of national policy. In response to the inclusion of ULEV into the hierarchy, the scheme now proposes that each plot is provided with charging points⁷. PPW recognises that the hierarchy should be applied according to local circumstances.
39. The village provides a wide range of services and facilities within acceptable walking distance of the site and the scheme provides a suite of measures that would improve existing walking and cycling connections to the centre as well as for recreational purposes. There are also contributions that would encourage use of public transport by prospective and existing residents. These measures would be secured through the UU and agreed planning conditions. The site is connected to nearby towns by the National Cycle Network Route 423 (NCNR 423). The distances involved (Usk some 5.5 miles and Monmouth 7.5 or so miles) means that experienced cyclists would be willing to make such trips to and from employment opportunities in these settlements. The proposed development clearly meets the policy guidelines relating to 'Active Travel' promoted within PPW. The facilitation of home working through the proposed high-speed broadband connection will reduce the need to travel to work.

Housing Supply

40. The County⁸ is experiencing a significant shortfall in housing supply. The scheme provides a means to reduce this deficit in a way that meets the ground rules set out in the Council's Protocol. This is an approach which assists the Council in

⁷ This suggestion was made at the hearing, refining an earlier proposal described in 6.63 of the applicant's Statement of Case.

⁸ All references to 'County' in this context exclude that part of Monmouthshire which falls within the planning jurisdiction of the Brecon Beacons National Park Authority.

dealing consistently with applications for new housing and in affording weight to the shortfall in housing supply in line with the Cabinet Secretary's letter on the disapplication of paragraph 6.2. Waiting for the adoption of the replacement LDP will mean that new sites will be unlikely to be delivered before 2023/24. The Council's approach as set out in its Protocol represents a housing supply intervention that accords with the expectation of PPW in such circumstances.

41. In September 2016, the Welsh Government announced the Programme 'Taking Wales Forward 2016-2021', which includes a commitment to work in partnership to deliver an extra 20,000 affordable homes to 2021. The application is supported by the Monmouthshire Housing Association on the basis of the pressing need for affordable housing in the County and particularly in Raglan. This is evidenced by the demand for the recent 10 dwelling scheme that has been developed. In March 2019, in an update to the November 2018 housing waiting list figures, 86 applicants were identified as in housing need with a connection to Raglan. This situation causes hardship to individuals and families.
42. The LDP target of 960 affordable homes should not be treated as a cap or a measure of the need. The 39 units proposed would represent a significant contribution to meeting an identified need.
43. The scheme respects the LDP's spatial strategy. The departure from the Plan, which arises from the breach of the development boundary, is justified by the scheme's contribution to boosting housing supply thereby securing sustainable development that ensures that local communities have sufficient housing, including affordable housing, to meet their needs and by directing development to sustainable locations.

The Scheme

44. The scheme has been carefully designed to relate well to the adjacent built environment and the surrounding countryside. Placemaking and improving green infrastructure have been important influences on a high quality design which would provide an attractive environment for residents, including extensive open space and a community orchard. A Heritage Statement has considered all potential effects on heritage assets. It has found no material harm to any feature other than a small level of harm to the Conservation Area. Cadw, the Glamorgan Gwent Archaeological Trust and the Council's Heritage Manager offer no objections.
45. The proposal incorporates measures to ensure that it is acceptable in all other respects. The application is supported by extensive specialist technical evidence to address all matters of potential concern, including ecology, highway safety, and flooding. It has satisfied all the statutory technical consultees engaged by the planning process. The classification of part of the site as 3a, which is the lowest category of Best and Most Versatile agricultural land, is acknowledged. For several reasons, particularly the absence of suitable alternative land of lower quality around Raglan, provides justification for its loss. PPW accepts the loss of such land where there is an overriding need for development and lower grade land is unavailable.
46. The applicant's experience and the expressions of interest from house builders demonstrates that the scheme can be delivered to comply with the shortened period for the commencement of development in line with the Protocol's ground rules.

47. The scheme will benefit the local economy, in the short term through construction work estimated to create 166 jobs and indirect benefits, and in the longer term, through increased local expenditure from prospective residents.

The Case for Monmouthshire County Council

48. The Council's position is summarised in its Statement of Case. The site lies outside the development boundary of the adopted LDP and is of a scale which is greater than the level of growth that it identified for Raglan. The Council supports the application on the basis of its timely contribution to meeting a shortfall in its 5 year housing land supply, and in particular the contribution that it would make to meeting a significant local need for affordable housing.

5 Year Housing Land Supply

49. Against the LDP housing targets there is an estimated shortfall in delivery of 504 dwellings, which includes 38 affordable homes. It has a 4-year housing land supply. This shortfall in supply below the 5 year requirement fails those members of the community in pressing need for homes by not responding to the social, economic and demographic challenges that presently face the County.
50. There are 290 households in bands 1-4 waiting for a home in the Raglan area, of which 56 have a clear local connection to Raglan. The average house price in the County is 9 times average earnings.
51. These circumstances warrant departing from the LDP, in line with a Protocol which it has agreed as a local response to the disapplication of paragraph 6.2 of TAN1. The ground rules that are set out in that Protocol are met by the scheme.

Transport Hierarchy

52. The introduction of the latest transport hierarchy in Edition 10 of PPW is acknowledged. The rural character of Monmouthshire, and the village of Raglan, justifies an approach which reflects local circumstances in accordance with paragraph 4.1.16 of PPW.
53. The proposed development is considered to meet the requirements of PPW in terms of the transport hierarchy. It would provide good active travel connections to services/facilities and therefore reduce the need to travel by car for local journeys. It is considered that the proposal has been designed to maximise connectivity within the development itself, and to the surrounding area. These factors significantly help to reduce reliance on the private motor vehicle.
54. Raglan provides a wide variety of services and facilities, including a primary school, doctor's surgery, convenience store and recreational grounds all within 225m to 600m of the centre of the application site. The UU would secure improved footway and crossing points to connect to these facilities
55. The site abuts a National Cycle Route (NCNR 423) which connects to Monmouth to the north east, and Usk to the south west. This provides an alternative means of travel to employment opportunities outside the Raglan area.
56. There is a bus stop within some 230m, with the UU making provision to provide a stop within 100m of the centre of the site. There are good bus services to Monmouth, Abergavenny and Newport with journey times of 22, 26 and 40 minutes respectively, with onward connection to rail services.

57. The scheme makes provision for infrastructure for ULEVs charging points within each plot, which is in line with the broad aim of PPW and is welcomed as the first such initiative in the County.

Greenfield site outside Settlement Boundary

58. The site is well-related to the existing built form and adjoins the settlement limit along its northern and western boundaries. In the absence of available previously developed or underutilised land it is a greenfield site suitable for development. The absence of suitable lower quality agricultural land around Raglan justifies the loss of class 3a in terms of national policy. The scheme has been designed to meet the green Infrastructure LDP policy and placemaking expectation of PPW.
59. The scheme would represent a 20.2% expansion in the number of dwellings in the village, or 28.4% when the approval on the allocated site at Chepstow Road is included. This is considered an acceptable increase which would retain Raglan as a modestly sized village.

Other Representations

60. Raglan Community Council consider that the County Council should do more to bring forward sites allocated for housing in the adopted LDP thereby avoiding the need to develop sites outside settlement boundaries. The scale of development in relation to the village is excessive, particularly taking into account other approved developments, and conflicts with ground rule 6 and LDP policy S1. This growth would damage local infrastructure; some pupils at the primary school would be displaced if it cannot be expanded. Having worked closely with the County Council in the preparation of the LDP, it considers that setting it aside would bypass important safeguards and undermine the integrity of the planning system.
61. The Raglan Conservation Group (RCG) shares the concerns of the Community Council. It also points out that Raglan is delivering the scale of growth identified in the LDP and considers that the disapplication of paragraph 6.2 of TAN1 was introduced precisely to prevent speculative applications such as this one and to reduce uncertainty for local communities. LDP review is the proper process to allocate new sites and provide for community engagement. The latest (2014) household growth projections indicate that the annual rate for new housing in the adopted Plan of 450 should be revised down to 240 homes. There would be landscape harm by urbanising an important edge of village site. The setting of the Castle, Church and the Conservation Area would be harmed. The A40 eastern crossing junction is a dangerous arrangement with accidents recorded. Additional traffic through the High Street will lead to pressure to restrict parking thereby harming shops. Ecology reports are incomplete in relation to bats, dormice and great crested newts. The loss of best and most versatile agricultural land conflicts with PPW. Finally it is suggested that flooding constraints prevent the expansion of the primary school.
62. The Raglan Village Action Group (RVAG) were represented at the hearing by planning, transportation and heritage specialists. The concerns it raises, which are detailed in its detailed written submissions including a Call-in Supplementary Statement, in most respects align closely with the Community Council and RCG. It considers that the stated scale of the Council's 5-year housing supply problem has been over stated and will reduce as allocated sites are developed. Sites are

now being progressed and this trend is expected to continue as the housing market becomes more buoyant after the abolition of the Severn tolls. The LDP affordable target requires only 38 more units to be met. This target is a robust one which, until a new Plan is adopted, should be favoured over more recent documents such as the Local Housing Market Assessment (LHMA) July 2018, and the accounts of individual families. Not all those identified as in need of affordable housing will rely on the planning system to meet their need.

63. The Protocol was devised to meet an undersupply of housing, but its ambition has been significantly broadened to tackle many other aspirations. Its approach, which has been decided without public consultation, is not the only solution to the identified problems. The application fails to satisfy several of the Protocol's Ground Rules (GR) – GR5 is breached as the scheme is not acceptable in other planning terms (conflict with transport hierarchy, harm to nationally designated heritage assets and valued landscape, and failure to promote a sense of place); the scale of growth conflicts with GR6; the site location is outside the area of the housing shortfall in conflict with GR7; the failure to identify how the new housing would align with demographic challenges conflicts with GR8. The scheme would spoil locally valued views and a much-used circular footpath. It conflicts with numerous LDP policies and PPW.
64. Raglan is described as a dormitory community with residents commuting to places such as Monmouth, Abergavenny, Newport and Cardiff because of the limited employment opportunities locally. These settlements are also the principal shopping destinations for goods and services other than the day-to-day provision in the village. The lack of demand for the bus service saw the frequency of one reduce from hourly to 2 hourly in 2018. A survey undertaken by the Group on 2 days suggests that there was no commuter use of buses by residents. The proposed financial contribution to the bus service is a gesture that will not change behaviour and there is no reason to believe that prospective residents of the scheme would not follow the same pattern as existing. Travelling by train would depend on linking by bus or car to the nearest stations, the nearest of which is 8.5 miles away in Abergavenny. Compared to car journeys commuting by bus and train is less convenient and more time consuming and inflexible. The LDP recognises that in rural areas residents are likely to continue using their cars. There is no evidence that any residents cycle to nearby towns to work, and the distances involved make this unlikely in the future. The provision of ULEV charging points should be a standard provision for new housing. Its inclusion in the scheme is welcomed but is not likely to be a significant influence on future residents owning such vehicles, given the cost of purchase and the limitations of the present network of charging facilities.
65. There are other sites that are more suitable to contribute to housing supply.
66. Dr Rees, a retired Inspector of Scheduled Ancient Monuments with Cadw, spoke on behalf of RVAG at the hearing but had not submitted written representations. She emphasised the importance of the internationally renowned Castle. She suggested that the extent to which the development would be visible from the upper parts of the Castle's ramparts would be greater than described by the specialists for the applicant and Council. Nonetheless she agreed that the effect would not be significant. However, she considered that the cumulative effect on local heritage assets would be a significant one.

67. Responding to the accident record on the relevant section of the A40 Ms Margaret Langley explained to the hearing that she had witnessed several accidents that had not been recorded as well as other incidents where accidents were only narrowly avoided.
68. Other concerns raised include the impact on a popular recreational walking route, the existence of a legal covenant preventing the land's development, the susceptibility of lower land to flooding, an increase in pollution levels, and that the scheme would set a precedent for further development of adjoining fields and more widely.
69. Expressions of support have also been submitted, citing benefits including providing additional housing in an attractive area which provides good commuting options. The affordable housing contribution would allow young people to move back to their community thereby introducing vibrancy and a more balanced demographic mix.
70. There were a number of consultation replies to the planning application. With the exception of the Community Council none raised objection to the scheme. Responses were received from: Natural Resources Wales; Glamorgan Gwent Archaeological Trust (GGAT); Welsh Government Network Management Division; Cadw; Dŵr Cymru Welsh Water; and Council officers in relation to: Highways, Planning Policy, Environmental Health, Housing Strategy and Policy, Green Infrastructure, Biodiversity, and Heritage.

Conditions and Obligations

Conditions

71. A draft list of suggested conditions was discussed at the hearing on a without-prejudice basis should the Welsh Ministers be minded to grant planning permission for the proposed development. That discussion was conducted in the light of Circular 16/2014 and led to the subsequent submission of a refined list that forms the basis for the schedule set out in an Annex to this report. I have refined the wording of some of the suggested conditions to align with the circular.
72. The reason for suggesting each of the conditions are also set out in the Annex. They include some minor refinements to the reasons suggested by the parties and, alongside my appraisal of the scheme, they explain why I consider each condition to be reasonable and necessary.

Obligations

73. A unilateral undertaking has been presented along with a Deed of Variation. Both have been duly completed and their combined effect is to provide several obligations: to ensure the provision of 35% of the total number of dwellings to be affordable housing; £60,000 towards the improvement of the local bus service; £60,000 to enable the extension of the existing footway on Station Road; £30,000 for the proposed widening and improvement of the existing footway on Monmouth Road; a combined off-site recreation and play contribution to be provided at the rate of £2,356 per dwelling to cover the cost of improvements to one or more local community facilities; commuted sum to be agreed for the management of the open space and wild play area unless these

areas are maintained by a private management company; and a financial contribution of £414,168 to address capacity issues at Raglan Primary school.

74. To ensure an earlier impact that would encourage new residents to adopt the habit of using public transport, the Deed of Variation ensures that a financial contribution to the bus service would be paid sooner than provided for in the UU. The Deed also provides a formula for education provision, to replace the fixed sum identified in the submitted UU, to reflect the fact that the precise number and size of dwellings that may be receive reserved matters approval has yet to be finalised.
75. The Council has provided a paper on the need for each obligation by reference to development plan policies and SPGs. I consider that the obligations are necessary, are related to the proposed development scheme and are related in scale and kind, and therefore meet the appropriate tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and Circular 13/97. None of the contributions would exceed the pooling limitation imposed by Regulation 123(3) of the Regulations, as amended. Accordingly, the Unilateral Undertaking, as varied, should be afforded weight in the determination of the application.

Appraisal

76. The main considerations are as follows:

- (i) the application of the transport hierarchy in relation to new development as advocated in Planning Policy Wales;
- (ii) the appropriateness of new housing on a greenfield site outside the settlement boundary, having regard to local and national planning policies;
- (iii) the effect on the character and appearance of the village and surrounding landscape;
- (iv) the effect on historic assets;
- (v) the contribution to the supply of housing within the County, including the local provision of affordable housing; and
- (vi) the overall planning balance taking into account any harm or benefit identified in relation to the foregoing considerations.

Consideration (i): Transport hierarchy

77. Raglan is a rural village that provides a relatively good range of facilities. It scores higher than all other LDP settlements, save for the Main Towns and Usk (another Rural Secondary Settlement) ⁹. It caters for the day-to-day services and facilities of most of its residents and provides some other facilities less frequently sought, such as health care and leisure. However, for many other less frequent needs, such as a weekly grocery shop or comparison goods shopping, and for visits to facilities such as the theatre or cinema, residents are likely to visit one of the larger towns in the County or further afield to Newport, Cardiff or Bristol. The same centres are likely to provide the main employment opportunities for many residents.
78. The scheme design, supplemented by financial contributions secured by the UU, seeks to encourage pedestrian trips to local facilities and services. A footway link onto Station Road would connect directly to the recently constructed primary school and an adjacent pedestrian link to the village centre via Chepstow Road. The scheme would contribute to the cost of providing a new footway along the west side of Station Road to link the school with playing fields to the south. The Council explained that whilst this scheme had recently failed to secure funding under the Safe Routes to School initiative, it was confident that negotiations with landowners were well advanced and that a route would be delivered.
79. To the north of the site the scheme makes provision for a pedestrian crossing point on Monmouth Road and to widen the existing narrow footway on the north side of the road. This would assist walkers to access the bus stop as well as linking into the village. This suite of off-site works would not only encourage future residents of the scheme to walk to facilities but would also benefit other residents.
80. The scheme, by means of one of the recommended conditions, proposes that each dwelling would have a faster broadband connection than is presently

⁹ LDP background paper- Function and Hierarchy of Settlements Study, October 2008

available in the village. I acknowledge that for certain workers, for whom such provision would be a significant benefit, this would encourage home working thereby reducing commuting journeys. This would align with the aim of the sustainable transport hierarchy which PPW explains should be used to reduce the need to travel. However, it is likely that many workers would need to travel, at least on occasions, to their place of work or to other locations.

81. The scheme would encourage use of public transport by providing good footway links and relocating the existing bus stops. It also proposes to improve the existing service by providing a £60,000 contribution. There already exists a £30,000 contribution which has been made in relation to the approved development on the 45 unit housing allocation in the village. Whilst the Council confirmed at the hearing that it was presently unclear how this sum of money would be used it is likely to facilitate earlier and later daily services and the possible change from a two hourly service to hourly. The likely impact of this change is not clear nor is the length of time to which the contribution would last. The aim is that an initial cash injection would encourage greater use which would generate sufficient additional income to become self-sustaining.
82. A local residents' survey suggests that there is presently very little use of the bus for commuting. Whilst I acknowledge the possibility of using the bus to access employment opportunities within the nearest towns, and the bus and/or train for destinations further afield such as Cardiff and Bristol, the time taken compared to car journeys and the restricted service frequency, means that the car is likely to be the preferred option for a significant proportion of prospective residents.
83. Raglan is connected via a National Cycle Route to Monmouth (7.5 miles) and Usk (5.5 miles). Active Travel Guidance identifies 10 miles as a maximum distance that cyclists would be expected to travel to work. However, whilst this would provide an alternative to motorised transport for workers in these towns, in practice, given the distance and topography of the journeys, the proportion of prospective residents that would use this option frequently is likely to be very modest. In any event the main employment opportunities would lie in more distant, larger settlements.
84. At the hearing the applicant altered its proposed approach to the provision of connection points for ULEVs such that each property would have a connection. Whilst this is not a requirement of local or national planning policy, it seems to me to be a proactive measure that would encourage residents to use such vehicles, albeit that the effect may take some time to materialise as their ULEV ownership is initially likely to reflect the relatively low rates of ownership in the general population.
85. The proposed development would be well connected to a good range of day to day facilities that residents would demand and the scheme - through its design, planning obligations and Travel Plan - makes good provision to encourage walking, cycling and the use of public transport. However, these measures do not alter the fact that the site is not as well connected to the services and employment opportunities that are provided in larger settlements. Consequently, it is likely that many prospective residents would choose to rely on the car to a significant extent. This is particularly the case given that the scheme would serve to meet a demand that arises from the south of the County. The fact that Raglan is better located than the northern half of the County to serve this area does not overcome my concerns that it is not well related in this

respect. Thus, on balance, I consider that the scheme does not perform well in relation to the transport hierarchy and therefore conflicts with PPW.

Consideration (ii): Greenfield site outside the settlement boundary

86. The main parties contend that, having regard to the scheme's compliance with the ground rules set out in the Protocol, developing this greenfield site outside the identified limits of Raglan is justified by the shortage of housing land supply within the County.
87. LDP policy S1 explains that the main focus of new housing will be in the Main Towns of Abergavenny, Chepstow and Monmouth. It identifies Raglan as one of 4 Rural Secondary Settlements to which a "small amount of new housing is directed". Policy S2 envisages that Raglan would provide 75 residential units over the Plan period. This includes identified commitments and completions (14 units), windfall opportunities (16 units) and an allocated site for 45 houses. The allocation has been granted outline planning permission, with a 35% affordable housing requirement. At the hearing it was revealed that a complex of 24 older persons flats has been demolished in recent years and the site has been recently redeveloped to provide 10 dwellings at St Cadocs Court, a 100% affordable housing scheme.
88. The Council acknowledged at the hearing that, whilst it considers that the scale of proposed development is acceptable for the village, the extent of growth proposed alongside the LDP provision exceeds the 'small amount' Policy S1 identifies. I agree and consider that the scheme conflicts with the LDP both in terms of the scale of local growth and its location outside defined development boundaries.
89. PPW prioritises the development of previously developed land over greenfield. At the hearing the Council explained the extent of brownfield land in the County was modest and that those sites that are allocated for development in the LDP are well advanced in their redevelopment. Moreover, its call for sites for the emerging LDP gave rise to very few new brownfield sites. Thus, there is no evidence to suggest that developing this site would prejudice the opportunity to develop any previously developed site that would be suitable for housing.
90. Approximately two-thirds of the site is estimated to fall within class 3a of the Agricultural Land Classification system which is the lowest quality land that constitutes the best and most versatile (BMV) agricultural land. PPW seeks to protect BMV, advising that it should only be developed if there is an overriding need for the development and suitable lower grade land or brownfield land are not available.
91. The applicant recognises the value placed on such land but points out that most of the land that is otherwise suitable for new housing around Raglan is of a higher quality. In response to a suggestion by RVAG that a potential site to the south west of the village may be of poorer quality, the Council confirmed that it considered¹⁰ that most of that land to be higher quality than the site (Class 2). It was a site that had not yet been advanced in relation to the current LDP call for candidates sites.

¹⁰ Based on the site's submission as a candidate site during the original LDP process

92. I acknowledge that there are planning constraints that limit the options for providing new housing elsewhere within the County. However, it is the local development plan process that provides the robust, transparent and inclusive system for identifying the most suitable sites in such circumstances. The justification presented for the loss of BMV in this case has focussed on the proposition that the development must take place in the vicinity of Raglan – I consider that this is a false premise given that primary justification for the scheme is the delivery of housing to meet the County’s need. Accordingly, I consider that the resultant loss of a nationally important agricultural resource is a harm that carries significant weight.
93. The Council’s Protocol seeks to facilitate the timely delivery of the scale of housing identified in the adopted LDP. However, the scale of the proposed development in relation to the host settlement and its location away from the growth centres identified in the Plan, including in terms of new employment opportunities, means that the scheme does not align well in terms of the adopted Plan’s strategy. In the circumstances, I find that the breach of the settlement boundary and the scale of the additional housing proposed, in conflict with the development plan, specifically policies S1, LC1 and S2, are weighty considerations against the scheme.

Consideration (iii): character and appearance

94. Noting the comment of the Woodland Trust, I am satisfied that the scheme has incorporated more than adequate off-sets between the proposed development and the numerous veteran trees that are located both within and on the boundary of the site. The recommended conditions and consideration of the reserved matters details would provide the means to ensure that this is the case.
95. The scheme would facilitate the improvement of the existing footpath along the north side of Monmouth Road and the provision of a new footpath link on the west side of Station Road. Evidence at the hearing confirmed that these measures are capable of being effected without harming the existing roadside hedgerows. The creation of a new access will require the loss of a short section of the hedge onto Monmouth Road. The associated visibility splays will require the loss or re-location of further sections of hedge, but this would be modest given the present hedge set back and the road alignment. The emergency access would utilise an existing farm gate.
96. The scheme has been designed in close consultation with the Council. There are generous areas of open space landscaping, and green infrastructure is an important element. The introduction of the built form into a presently open field will inevitably affect the natural landscape which is clearly valued by local residents, including those who use the public footpath that runs along its eastern boundary.
97. However, whilst the field provides a pleasant view it holds no particular landscape value and is similar in appearance to several other large undulating fields in its vicinity. I have taken into account the applicant’s Landscape and Visual Impact Assessment which has been prepared in accordance with the latest guidance on methodology¹¹ and agree with its findings that the effect on

¹¹ Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and IEMA, 2013)

landscape character and visual amenity of extending the built form is acceptable. The project would undoubtedly alter the experience for users of the public footpath on the periphery of the site. However, as the route would form part of the green infrastructure some distance from proposed buildings it would provide a pleasant recreational path as the scheme matures. I also consider that the development's relationship with the built form to be acceptable – it would not appear discordant in relation to the relatively modern development nearby much of which would be partly screened by mature vegetation.

98. In terms of scale of development, whilst residents expressed concerns over infrastructure capacity there is no suggestion that the scheme would affect the social character or community cohesion of the village. Indeed, as supporters of the scheme suggest, the affordable housing in particular would enable young people to move back to their community adding vibrancy and a better demographic mix.
99. Subject to further consideration of detailed aspects of the scheme at a later stage, I consider that the scheme's effect on the character and appearance of the village and its surrounding landscape to be acceptable. Its design accords with the high quality sought by LDP policy DES1.

Consideration (iv): Historic assets

100. The Castle is severed from the village by the A40 dual carriageway. Given the historic relationship and proximity between the Castle and village, the latter clearly lies within the setting of the former. However, noting the specialist comments on behalf of Cadw, the Council and the applicant, I find that the scheme would not harm the significance of the Castle. The visibility of the development from the Castle would be very limited given the screening effect of several areas of vegetation, supplemented by the scheme's landscaping and the fact that the site falls away from the direction of the Castle.¹² In the context of the panoramic view that is available over the village, I consider that the extension of the built form in a direction away from the Castle would not materially alter the relationship between the Castle and the village and its surrounding countryside.
101. Within parts of the site and its vicinity glimpses of the upper parts of the Castle are presently available, aided by the presence of an area of open space between the rows of houses on the north side of Monmouth Road. Given the intervening distance¹³, the presence of tall trees, and the prominence of some of the houses the views do not provide an appreciation of the scale or prominence of the Castle. The loss of some of these restricted views would not affect the significance of the asset within its setting.
102. The Grade II* listed St Cadoc Church lies some 175m from the site. The intervening built form and significant vegetation greatly limits any inter-visibility. There would be no material impact on the significance of this asset.
103. At its closest point the designated Historic Park and Garden is estimated to be within 245m or so of the site. However, the extent to which buildings and

¹² Photoviewpoint 12 in the LVIA

¹³ The castle keep is estimated to be some 515m from the closest part of the site

significant lines of trees screen the site mean that there would be no material impact on this asset.

104. The site lies adjacent to a part of the Raglan Conservation Area which is identified as Character Area (CA) 2 in the Appraisal SPG. It lies between the Monmouth Road boundary to the application site and the A40, which forms the southern boundary to Character Area 1, the Castle & Landscape Setting. The part of CA 2 closest to the site consist of a row of fairly modern, unremarkable houses, many in landscaped grounds. To the west lies CA 3 which includes the historic core of the village centre including the Church. It clearly has a special character as the historic core of the village. CA 3 would be largely screened from the application site. The Appraisal identifies the open views across the countryside to distant hills from Monmouth Road which are described as of 'very high significance'. Neither the Appraisal nor the specialists at the hearing were able to identify any special character of the designated area that would be harmed by the development, other than the loss of farmland that forms part of the wider setting to the historic village. The harm is small but given the protective provisions of PPW and LDP policy HE1 in relation to the setting of conservation areas, I afford it modest weight.
105. The eastern extremity of the site straddles part of the boundary of one of 3 historic deer parks. The scheme has been designed to avoid building on this area which will serve as open space and will provide an opportunity to improve appreciation of the feature. A watching brief condition will provide adequate safeguard should construction works reveal any archaeological features.
106. On this matter, I consider that the scheme would cause minor harm to the setting of the Conservation Area in conflict with local and national policy. In terms of the other nearby historic assets I am satisfied that it would not harm their setting, nor the potential archaeological value of the site and that no materially harmful cumulative impact would arise.

Consideration (v): Housing supply

107. The latest draft Joint Housing Land Availability Study, over which there is no dispute, identifies a 4-year HLS. This figure was revised from 4.2 years to reflect the uncertainty of delivery of the subject application site following its call-in. This compares to 3.9 years last year, which is an improvement which the Council attributes to the effect of its Protocol.
108. The Council estimates that by the end of the life of the Plan in December 2021 there will be a shortfall in housing delivery of 504 dwellings against the target of 4,500 units. It accepts that it has been slow in bringing forward some of the LDP housing allocation sites within its ownership but confirmed now that all those sites were being progressed. It further confirmed that all allocated sites were now being progressed, with the exception of a part of one allocated site. The identified shortfall reflects that some of those sites will not be completed within 5 years. RVAG argues that the future availability of these sites mean that 'they will become available' thus meeting the requirement of paragraph 4.2.15 of PPW.
109. The Council confirms that the area of greatest shortfall in housing delivery is in Chepstow and Severnside in the south of the County, which are identified as key parts of the LDP's settlement hierarchy. The options for releasing more land in this area is limited by the extent of green wedge designation and flooding constraints. It suggests that the limited pre-application enquiries and LDP

candidate site submissions it has received is evidence that there few options available in this area to meet the demand. The growth options around Monmouth is also presently constrained, in that case by sewerage capacity.

110. At the hearing the applicant confirmed that, based on its extensive experience in promoting the development of housing sites, that the proposed scheme could be realised within 2 years of the grant of permission. It had carried out extensive marketing which has resulted in significant interest from a range of house builders and was confident that the scheme, having regard to the requirements of the UU and the suggested planning conditions, was an economically viable proposal. Moreover, it was confident that the need for further survey work in connection with protecting the ecological interest of the site could be accommodated within this timetable.
111. Having regard to one of the stated objectives of the Protocol, and specifically ground rule 8, the main parties agreed a condition that would ensure that both open market and affordable housing contain a mix of house types that would meet the greatest need as identified in the Local Housing Market Assessment.
112. In light of the disapplication of paragraph 6.2 of TAN1, but mindful that PPW requires local planning authorities to provide a 5 year HLS and the emphasis placed in PPW on ensuring an adequate supply of deliverable housing sites, I attach significant weight to the present extent of under-supply of housing in the County. However, that weight is reduced by the likelihood that the shortfall in supply will be addressed through the emergence of the replacement LDP with adoption in the next 2.5 years or so.
113. The Council points to the problems of affordability that rising house prices in the County is causing its residents, which has been exacerbated by increasing demand following the abolition of bridge tolls over the Severn. It also identifies the particular demand for affordable housing in the Raglan ward.
114. The delivery of affordable housing against the LDP target of 960 has been high with only a further 38 units required before the end of the LDP life span. I am mindful that this figure is not a measure of the need for such housing or intended as an upper limit on supply. However, it is a target that was identified as deliverable by the planning system over the LDP period. The Council points out that the application site will not provide all its 39 units within the LDP lifetime.
115. National policy identifies the importance that the Welsh Government attaches to the role of the planning system in increasing the supply of affordable housing as part of its ambition to secure an additional 20,000 homes by 2021. The potential of the scheme to contribute 39 affordable housing units to meet the pressing local need identified is a significant benefit.
116. Citing the latest (2014) Welsh Government household formation projection rates, local residents suggest that the Council's need for housing is inflated. However, this is a matter for consideration at the examination into the emerging LDP having regard to whether a trend-based projection is appropriate, particularly having regard to any policy-based aspiration for growth.

Other Considerations

117. The applicant has taken on board advice from Natural Resources Wales (NRW) and the Council's Ecologist such that they offer no objections subject to the

imposition of conditions. Noting the local presence of protected species, dormice and great crested newts, NRW has confirmed that it does not consider that the development is likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. The applicant acknowledges the need to secure a European Protected Species licence before undertaking work that may affect dormice. Thus, I am satisfied that, provided the relevant recommended conditions are imposed, the scheme would not unacceptably affect any ecological interest. Indeed, in the longer term, there is potential to improve biodiversity through the additional landscaping proposed and future maintenance of the green infrastructure.

118. The scheme is estimated to give rise to an additional 24 primary school age pupils. Local residents are concerned that this increased demand for places would displace pupils that presently attend the school from more peripheral parts of the catchment area. The school is presently only some 6 places short of its capacity and there are other housing developments in the village that have already been approved. The Council accepts the applicant's evidence that demographic trends of the existing population suggest there would be 20% fewer pupils at the school by 2027/28. Notwithstanding this, the scheme proposes a financial contribution that would be dependent on the number and mix of houses to be provided, in line with a formula set out in its interim SPG, that would allow the Education Authority to increase the school capacity.
119. Some local residents express concern over highway safety, specifically the easternmost junction onto the A40 from the village which has a central refuge for vehicles crossing from, or joining, the east bound carriageway. Technical reports have been presented by the applicant and have been found to be acceptable by the local Highway Authority and Welsh Government Network Management Division. The latter's response was informed by an independent safety audit which it commissioned. Whilst I note the experience of some local residents, I find no compelling reason not to accept the technical evidence and advice presented. There is some concern that increased traffic along High Street would cause congestion that, in turn, would lead to the introduction of on-street parking restrictions. Even if this were the case, given the convenience of a public car park off Chepstow Road, there is no persuasive evidence to suggest that the commercial vibrancy of the centre would be undermined.
120. Concerns over localised flooding relates to the operation of a culvert on the site boundary. As it has the potential to affect a few houses in the south western corner of the site a condition is recommended to remove the risk. I consider that the concern of some objectors that approving the scheme would set a precedent for house building on adjacent fields to be unfounded, not least given the such a scheme would be specifically contrary to ground rule 7 of the Council's Protocol. Concern over a possible restrictive covenant, which the applicant is confident is not an impediment, is a private interest matter outside the scope of the planning system.

Planning Balance and Overall Conclusion

121. The scheme proposes to provide a mix of housing that responds to local demand and would boost the County's supply of housing which falls short of 5 years. However, the degree of shortfall, at one year, and the prospect of securing an increased supply through the emerging replacement LDP in a reasonably short timescale, mean that I afford this consideration moderate weight. I attach

significant weight to the additional affordable housing that would arise in the light of the identified demand and the Government's emphasis on increasing provision. Nonetheless, as the County has performed well in the delivery of affordable housing against the LDP target and the scheme proposes no higher a provision that would be sought on allocated sites, this is not a consideration that justifies departing from the development plan approach to siting new housing.

122. The economic benefits of the scheme, most notably during the construction period but also in future residents' local expenditure which may help sustain local services are factors that together attract appreciable weight. In reaching this finding I am mindful of the social and well-being benefits that would arise. The timely realisation of these benefits in meeting present needs responds well to an aspect of sustainable development. I also attach modest weight to the indirect benefits to the wider community that would arise from proposed off-site works and contributions, for instance improvements to footway provision, play space and bus services.
123. I afford significant weight to the loss of greenfield land given that it is classed as best and most versatile agricultural land. For the reasons I have already set out I consider that the other site-specific harms that have been identified by objectors – including the effect on the setting of the Conservation Area and the Castle, and the landscape impact – are minor and taken together do not attract more than modest weight in the overall balance.
124. In addition to these adverse impacts I find that the scheme conflicts with the LDP strategy for the distribution of housing growth. The site is some distance from the identified areas of both highest demand for housing and the greatest opportunities for employment. In relation to the resultant journeys, and despite improvements facilitated by the scheme, I consider that take up of public transport services will be relatively low because of the convenience and time saving offered by the car in this case. In short, Raglan is not a settlement that performs sufficiently well in relation to the Transport Hierarchy nor the LDP strategy to justify the scale of growth proposed. This is a consideration to which I afford considerable weight, particularly recognising the environmental dimension to the Well Being of Future Generations (Wales) Act 2015 (WBFG Act) and the importance of promoting sustainable development.
125. The scheme's conflict with the development plan does not align with the emphasis on placemaking as set out in PPW. It identifies sustainable placemaking as an inclusive process, involving all those with an interest in the environment, which focuses on developing plans and making decisions that contribute to sustainable places. In proposing housing growth in a location distant from identified employment opportunities, the scheme lacks the holistic approach advocated in PPW which seeks the right development in the right place to achieve sustainable placemaking outcomes.
126. Overall the present need for housing that has been identified, when taking into account the measures that are in hand in terms of replacing the LDP, does not justify permitting the proposed scale of development on the edge of this rural village. In reaching this conclusion I am mindful of the primacy of the development plan in decision making, not least given the degree of certainty, transparency and engagement that this provides to all stakeholders, including local communities.

127. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the WCFG Act. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objectives of supporting safe, cohesive and resilient communities and to connect communities through sustainable and resilient infrastructure.

Recommendation

128. For the reasons given above, and having had regard to all other matters raised, I recommend that the application is refused. However, should the Minister be minded to grant permission, it is recommended that the conditions set out in the Schedule below are imposed.

Hywel Wyn Jones

INSPECTOR

Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.

Reason: To comply with Section 92 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2) (a) Any application for approval of the reserved matters shall be made to the local planning authority not later than one year from the date of this permission.

(b) The development shall begin either before the expiration of two years from the date of this permission or before the expiration of one year from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: To comply with Section 92 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004 and to ensure timely delivery of the housing units in accord with the ground rules set out in "Addressing our lack of 5 year land supply: Monmouthshire's Approach to Unallocated Sites".

- 3) The development shall be carried out in accordance with the list of approved plans and documents set out in the table below:

Plan/Document Reference Number:	Version:
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Proposed Site Access Layout - 001	
Proposed Site Access Layout Swept Path Analysis - 002	
Application Masterplan AI07	G
Application Boundary Plan - 01	
Great Crested Newt Mitigation Strategy, by Tyler Grange LLP	(Report Ref: 11094_R08b_DJM_LP, dated 25th October 2018)
Dormouse Mitigation Strategy, by Tyler Grange LLP	(Report Ref: 11094_R09c_IS_MM, dated 25th October 2018)

Reason: To ensure the development is carried out in accordance with the approved drawings, for the avoidance of doubt.

- 4) The details submitted pursuant to the Reserved Matter for landscaping shall accord with the guidelines set out in Plan 11: GI Masterplan and Illustrative GI Masterplan in addition to providing details incorporating: proposed finished levels or contours; means of enclosure; hard surfacing materials; soft landscape details including planting plans, specifications including cultivation and other operations associated with plant and grass establishment, schedules of plants, noting species, sizes, numbers and densities.

Reason: To maintain and enhance Green Infrastructure Assets in accordance with LDP policies, DES1, S13, GI1, EP1 and SD4.

- 5) A "lighting design strategy" shall be submitted at Reserved Matters for approval in writing by the local planning authority. The strategy shall: a) identify those areas/features on site that are particularly sensitive for biodiversity and that are likely to be caused disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed only in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy.

Reason: To safeguard habitat used by foraging and commuting species and to limit adverse changes to behaviour of biodiversity in accordance with LDP policy EP3 and in the interests of visual amenity in fulfilling LDP Policy LC5.

- 6) Pursuant to the submission of Reserved Matter for landscaping, a Green Infrastructure Management Plan, having regard to the Green Infrastructure

Masterplan Drawing Number 11094/P14a, dated October 2018, shall be submitted to, and be approved in writing by, the local planning authority. The content of the Management Plan shall include the following:

- a) Description and evaluation of Green Infrastructure assets to be managed eg community orchard, grassland, swales and SuDS area, green corridors, wild play areas.
- b) Opportunities for enhancement to be incorporated: management of grassland for botanical species diversity and/or protected species including reptiles; SuDS feature to hold water all year round; provision of hibernacula suitable for reptiles/amphibians; maintain habitat connectivity through site for species such as hedgehogs; dark areas to support bat foraging; tree/hedgerow management.
- c) Trends and constraints on site that might influence management of above features.
- d) Aims and objectives of management.
- e) Appropriate management options for achieving aims and objectives.
- f) Prescriptions for management actions.
- g) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a twenty-year period).
- h) Details of the body or organization responsible for implementation of the plan.
- i) Ongoing monitoring and remedial measures.

The Management Plan shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the Green Infrastructure Management Plan are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning Green Infrastructure objectives of the originally approved scheme. The Management Plan shall also include a schedule of landscape maintenance for a minimum period of five years and shall include details of the arrangements for its implementation. The approved plan will be implemented in accordance with the approved details.

Reason: To maintain and enhance Green Infrastructure Assets in accordance with LDP policies, DES1, S13, GI1, NE1, EP1 and SD4.

- 7) No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource in accordance with Paragraph 6.1.27 of Planning Policy Wales (Edition 10, 2018).

- 8) No development shall commence until detailed design, technical audits have been submitted for the proposed emergency vehicular access link to Station Road have been submitted to and approved by the Local Planning Authority; the development shall be carried out in accordance with the approved details prior to first occupation of any dwelling and retained as such in perpetuity.

Reason: In the interest of highway safety and to ensure compliance with Policy MV1 of the Local Development Plan.

- 9) Prior to any works commencing on site a Construction Traffic Management Plan (CTMP) shall be submitted to and approved by the local planning authority, which shall include traffic management measures, hours of working, measures to control dust, noise and related nuisances, and measures to protect adjoining users from construction works. The development shall be carried out in accordance with the approved CTMP.

Reason: To ensure the development is carried out in a safe and considerate manner and to ensure compliance with Policies EP1 and MV1 of the Local Development Plan

- 10) No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under section 38 of the Highways Act 1980 or a private management and Maintenance Company has been established.

Reason: In the interest of highway safety and to ensure compliance with Policy MV1 of the Local Development Plan.

- 11) Prior to the removal or maintenance of the dead ash tree (T01 - drawing ref. 11094/P03) a method statement for its safe removal shall be submitted to the Local Planning Authority for approval in writing. The method statement shall include:

- a) Methods in accordance with Best Practice to assess the tree for bat roosts
- b) Methods in accordance with Best Practice to sensitively fell the tree including climbing and section felling under the supervision of a licensed bat worker
- c) Measures and actions to be undertaken if roosts are identified at any time.

The method statement shall thereafter be implemented in full.

Reason: To safeguard species protected under the Conservation of Habitats and Species Regulations 2017.

- 12) Prior to the commencement of development, a strategy for carrying out bird monitoring surveys shall be submitted to and approved by the Local Planning

Authority and implemented in full to assess the continued use of the site by breeding birds.

Reason: To safeguard nesting bird species protected by Schedule 1 of the Wildlife and Countryside Act, 1981, as amended and Policy NE1 of the Local Development Plan.

- 13) No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities;
- b) Identification of "biodiversity protection zones";
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d) The location and timing of sensitive works to avoid harm to biodiversity features;
- e) The times during construction when specialist ecologists need to be present on site to oversee works;
- f) Responsible persons and lines of communication;
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person; and
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

Reason: To safeguard habitats and species protected under the Conservation of Habitats and Species Regulations 2017, the Wildlife and Countryside Act 1981 (as amended), Environment (Wales) Act 2016 and Policy NE1 of the Local Development Plan.

- 14) No development shall take place until a drainage scheme has been submitted to, and approved by, the Local Planning Authority. The scheme shall provide for the disposal of foul, surface and land water and shall include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no surface water or land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To ensure satisfactory facilities are available for disposal of foul and surface water in accord with Policy SD4 of the Local Development Plan.

- 15) Prior to the commencement of development, a scheme for the provision of electric vehicle charging points for all dwellings on the site shall be submitted to and agreed in writing by the Local Authority. Each charging point shall be

provided in accordance with the approved scheme and made available prior to the occupation of each dwelling as appropriate.

Reason: To encourage the use of Ultra Low Emission Vehicles in support of Planning Policy Wales 10 paragraph 4.1.16 which adds electric vehicles to the sustainable transport hierarchy.

- 16) Prior to the commencement of development, a scheme for the provision of pure end-to-end fibre broadband shall be submitted to and approved in writing by the Local Planning Authority. The enhanced broadband provision as approved shall be implemented prior to first occupation of the associated dwelling.

Reason: To improve digital connectivity and help to improve the ability of future residents to work from home and therefore reduce the need to travel in accordance with Section 5.2 of Planning Policy Wales (Edition 10, 2018).

- 17) Pursuant to the submission of Reserved Matters for layout and external appearance, details of the mix of housing (including both market and affordable housing) shall be submitted to the Local Planning Authority. The proposed housing mix shall reflect the evidence contained in the Local Housing Market Assessment (September 2018), Monmouthshire's Hometrack database and CACI data on average household incomes for the Raglan Output Area. Development shall be carried out in accordance with the approved details.

Reason: To ensure that the size and mix of the proposed dwellings are suitable for the location and address the identified demographic challenges, in accord with the ground rules set out in "Addressing our lack of 5 year land supply: Monmouthshire's Approach to Unallocated Sites".

- 18) The development shall be implemented and monitored in accordance with the details in the Travel Plan Rev A, prepared by Hub Transport Planning Ltd (dated 15.02.19) at the time of first occupation of the development and shall be retained and operated in perpetuity.

Reason: To promote the use of modes of transport, other than use of private motor vehicles, in pursuance of Policy MV1 of the Local Development Plan and Section 4.1 of Planning Policy Wales (Edition 10, 2018).

- 19) No development shall commence until details of existing ground levels and proposed finished ground and floor levels have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To prevent the increased risk of flooding, having regard to Policy SD3 of Local Development Plan.

- 20) Prior to the commencement of the development a noise mitigation scheme shall be submitted to and approved in writing by the Local Planning Authority to confirm, given the current proposed layout of properties, the mitigation

measures that will be implemented at those properties, that have been established by the Noise assessment conducted by M-EC, where the daytime internal sound levels of 35 dB(A) will be exceeded.

Reason: To ensure compliance with Policy EP1 of the Local Development Plan as well as BS 8233:2014 and WHO Guidelines for internal sound levels.

APPEARANCES

FOR THE APPLICANT:

Miss Morag Ellis QC	Francis Taylor Building
Mr Gareth Barton BSc DipTP MRTPI	Turley (Planning)
Mr Gerard McKinney BA (Hons) MSc MCILT	Hub Transport Planning
Ms Lianne Brook BSc (Hons)	Hub Transport Planning
Ms Gail Stoten BA MCIfA FSA	Pegasus (Heritage)
Mr Nick Banks MSc	Regional Director, Richborough Estates
Mr James Carpenter BA (Hons) MSc MRTPI	Planning Director, Richborough Estates
Mr Jonathan Berry CMLI AIEMA MArborA	Tyler Grange (Landscape Architecture)
Mr Steven Clyne LCP DipSMS CertEd MAE	EFM (Education Advisor)

FOR THE LOCAL PLANNING AUTHORITY:

Mr Mark Hand BSc Hons MSc PG Cert MRTPI	Planning Control Lead
Mr Andrew Jones BA MSc	Development Management Area Manager
Ms Amy Longford BSc MSc PG Dip IHBC	Heritage Manager
Mr Mark Davies HNC Civ Eng	Highway Development Manager
Mr Christian Schmidt BSc MSc CMILT	Transport Planning and Policy Officer

INTERESTED PARTIES:

Mr George Ashworth BA(Hons) MSc (MRTPI Ret'd)	Raglan Village Action Group (Planning)
Mr Peter Woodrow MICE MIGHT	Raglan Village Action Group (Transport)
Dr Sian Rees PhD CBE	Raglan Village Action Group (Heritage)
Ms Helen Ronchetti	Secretary to Raglan Village Action Group
Ms Karen Tarbox	Director of Property Services, Monmouthshire Housing Association
Ms Margaret Langley	Local resident

Documents

- 1 Consultation and notification replies
- 2 Extracts from Local Development Plan
- 3 LDP Function and Hierarchy of Settlements Study, Oct 2008
- 4 Aerial image showing candidate site to south west Raglan
- 5 Final version of suggested conditions
- 6 Section 106 unilateral undertaking and associated Deed of Variation

Appendix 2: Assessment Methodology

Assessment of significance

In the Welsh Government's Technical Advice Note 24 (henceforth referred to as TAN24), significance is defined as:

"The sum of the cultural and natural heritage values of a place".¹⁹

Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (henceforth referred to as *Conservation Principles*) advocates considering the four types of heritage value an asset may hold: **evidential**, **historical**, **aesthetic** and **communal**.²⁰ These are described as follows:

- **Evidential value:** the potential of a place to yield evidence about past human activity. This value is derived from physical remains or historic fabric. Additional evidential values can be gained from documentary sources.
- **Historical value:** the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- **Aesthetic value:** the ways in which people draw sensory and intellectual stimulation from a place through its form, external appearance or setting.

- **Communal value:** the social and economic values, and spiritual meanings, that an historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory.

This approach allows for a detailed and justifiable determination of significance and the value from which that significance derives.

Significance results from a combination of any, some or all of the values described above.

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest.

Setting and significance

Setting is defined within TAN 24 as:

"... the surroundings in which it [a historic asset] is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve.... Setting is not itself a historic asset, though land within a setting may contain other historic assets."²¹

Paragraph 1.25 of TAN 24 also states that:

¹⁹ Welsh Government, TAN24, p. 47.

²⁰ Cadw, *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (2011).

²¹ Welsh Government, TAN24, p. 10.

“Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”²²

Assessing change through alteration to setting

- 4.81. How setting might contribute to these values has been assessed within this Report with reference to *Setting of Historic Assets in Wales* produced by Cadw, particularly the four stages of assessment in Section 4 of the document as summarised below. This advocates the clear articulation of ‘what matters and why’.²³
- 4.82. Step 1 is to identify the historic assets affected and their settings. Step 2 is to “define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced”. The guidance includes a (non-exhaustive) check-list of elements that may contribute to a historic asset through setting including: functional and physical relationships, topographic features, physical surroundings, original layout, buried or archaeological elements, views to/from/across, formal or planned vistas, prominence, views associated with aesthetic / functional / ceremonial purposes, historical / artistic / literary / place name / cultural / scenic associations, noise, smell, tranquility / remoteness / wildness.
- 4.83. Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to “consider

options to mitigate or improve the potential impact of a proposed change or development on that significance”.

- 4.84. Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

Levels of significance

Under TAN 24 a ‘historic asset’ is defined as:

“An identifiable component of the historic environment. It may consist of or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.”²⁴ (Our emphasis).

These nationally important designated historic assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites and Conservation Areas.

Listed Buildings are designated in three grades, reflecting their relative importance, as defined in TAN24:

- Grade I – buildings of exceptional, usually national interest.

²² Idem.

²³ Cadw, *Setting of Historic Assets in Wales* (May 2017).

²⁴ Welsh Government, TAN24, p. 6.

- Grade II* – particularly important buildings of more than special interest.
- Grade II – buildings of special interest which warrant every effort being made to preserve them.

Assessment of harm and benefits

Planning Policy Wales requires that the potential impacts of a development on the significance of any historic asset/assets are assessed. Hence any impacts are described in terms of how they affect the significance of a historic asset, and heritage values that contribute to this significance, including any impacts resulting through changes to setting.

Proposed development may also result in benefits to historic assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

Appendix 3: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.²⁵ It does not provide statutory protection for non-designated or Locally Listed historic assets.

Section 66(1) of the Act states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”²⁶

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving

or enhancing the character or appearance of that area.”²⁷

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.²⁸ Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.

In addition to the statutory obligations set out within the aforementioned Acts, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.²⁹

²⁵ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

²⁶ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

²⁷ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

²⁸ UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

²⁹ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 4: National Policy Guidance

Planning Policy Wales 2021

National policy is set out in Planning Policy Wales 2021 (PPW11). Chapter 6 of PPW11 is concerned with the Historic Environment. This recognises that the historic environment is:

“... central to Wales’s culture and its character, whilst contributing to our sense of place and identity. It enhances our quality of life, adds to regional and local distinctiveness and is an important economic and social asset.”³⁰

PPW11 identifies historic assets as a non-renewable resource and sets out that it is important that the planning system:

“... looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on a historic asset or its setting should be managed in a sensitive and sustainable way.”

PPW11 sets out the framework for making informed decisions regarding proposed change which could have an impact on the historic environment, stating that:

“... any decisions made through the planning system must fully consider the impact of the historic environment and on the significance and heritage

values of individual historic assets and their contribution to the character of place.”

For Listed Buildings, paragraph 6.1.10 states that:

“There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage.”

Paragraph 6.1.11 goes on to confirm that:

“... the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The continuation or reinstatement of the original use should generally be the first option, but not all original uses will now be viable or appropriate. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building’s survival or provide it with a sound economic future.”

For Conservation Areas, paragraph 6.1.14 states that:

“There will be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings.”

³⁰ Planning Policy Wales Edition 11, Welsh Government, 2021.

Paragraph 6.1.16 goes on to confirm that:

“... preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area’s character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area.”

With regard to Historic Parks and Gardens, paragraph 6.1.18 of PPW11 states:

“Planning authorities should value, protect, conserve and enhance the special interest of parks and gardens and their settings included on the register of historic parks and gardens in Wales....”

Paragraph 6.1.19 confirms:

“The effect of a proposed development on a registered park or garden, or its setting, is a material consideration in the determination of planning applications.”

In relation to nationally important archaeological remains, which include Scheduled Monuments, PPW11 (at paragraph 6.1.24) states:

“Where nationally important archaeological remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of

national importance) or has a demonstrably and unacceptably damaging effect upon its setting.”

Planning Policy Wales Technical Advice Note 24: The Historic Environment

TAN24 was launched by the Welsh Government in 2017. The purpose of the TAN is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on applications for Planning Permission or Listed Building Consent. The TAN provides specific guidance on how the following aspects of the historic environment should be considered:

- World Heritage Sites
- Scheduled Monuments
- Archaeological remains
- Listed Buildings
- Conservation Areas
- Historic Parks and Gardens
- Historic Landscapes
- Historic assets of special local interest.

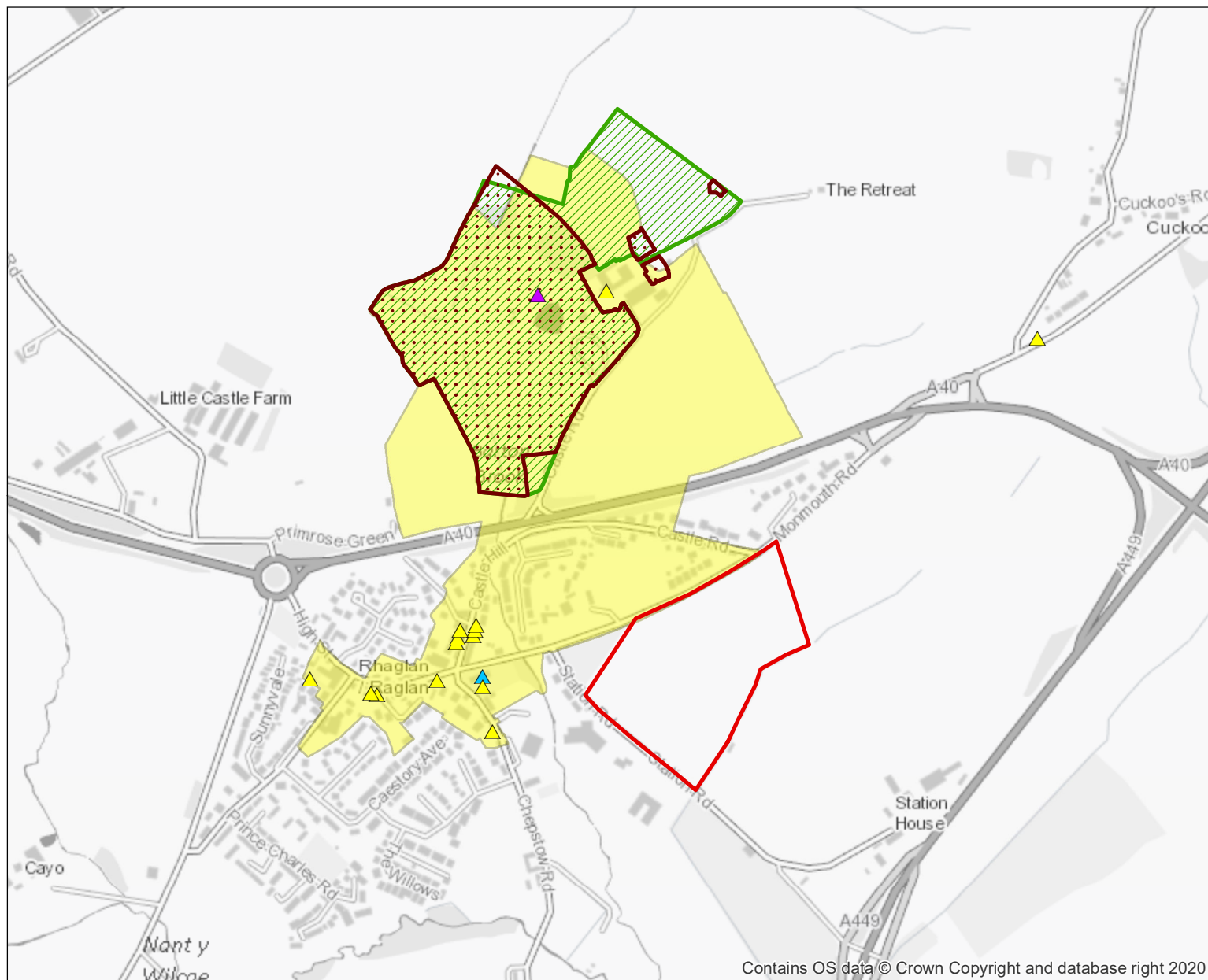
TAN24 also sets out the requirement to consider the potential impact of proposed developments upon the setting of historic assets, confirming that it is for the Local Planning Authority to consider the effect of proposed developments within the settings of Listed Buildings, Conservation Areas, unscheduled monuments of national importance and other undesignated historic assets.

Cadw have also produced a number of best practice guidance documents to provide information on the assessment of the historic environment within the context of the planning and legislative framework. These include Heritage Impact Assessment in Wales which is intended to be read alongside PPW and TAN 24.³¹

³¹ Cadw, *Heritage Impact Assessment in Wales* (May 2017).



Appendix 5: Map of Designated Historic Assets



KEY

- Site
- Raglan Castle Scheduled Monument
- Raglan Castle Registered Historic Park and Garden
- Raglan Conservation Area

Listed Buildings

- ▲ Grade I
- ▲ Grade II*
- ▲ Grade II

Appendix 5: Map of Designated Historic Assets

Land South of
Monmouth Road,
Raglan

Client: Richborough Estates

DRWG No: P17-1744 Sheet No: - REV: -

Drawn by: JT Approved by: GS

Date: 18/07/2023

Scale: 1:10,000 @ A4

PEGASUS
GROUP



Appendix 6: Cadw Designation Reports

Scheduled Monuments- Full Report



Summary Description of a Scheduled Monument

Reference Number	Name	Date of Designation	Status
MM005	Castell Rhaglan		Designated

Location

Unitary Authority	Community	Easting	Northing
Monmouthshire	Raglan	341388	208266

Broad Class	Site Type	Period
Defence	Castle	Medieval

Description

Summary Description and Reason for Designation

The following provides a general description of the Scheduled Ancient Monument.

The monument consists of the remains of a castle, dating to the 15th century. Raglan was built, not as a defensive structure, but as a fortress-palace by Sir William ap Thomas in the 1430s and 1440s. Sir William had bought the manor of Raglan in 1432 and set about demolishing the existing manor house and building Raglan Castle. He built the Great Tower, the South Gate, the hall range and possibly a wall enclosing what was to become the Fountain Court. He was building to impress, to demonstrate his new-found wealth and rank, and his Great Tower, which mimicked the keeps of earlier medieval castles and was known as the Yellow Tower of Gwent, was the ultimate status symbol. William died in 1445 and his, equally ambitious, son, Sir William Herbert continued the building programme. Sir William was enormously wealthy, and a powerful supporter of Edward IV. His castle buildings include the Gatehouse, the closet tower, the kitchen and the office wing, built between 1445 and 1469 when he was executed by Lord Warwick 'The Kingmaker' for his support of the Yorkist claim. All of the 15th century buildings are characterised by very high quality stonework, with ashlar walls of pale yellow sandstone from Redbrook in the Wye valley. Some of the earliest

brickwork in Wales is visible in the later 15th century parts; it was used extensively in vaulting, in the back of fireplaces, over windows and in awkward corners. William Herbert arranged his palace around two courts, now called the Pitched Stone court and the Fountain Court. He moved the entrance to the great gatehouse, added the chapel on the west side of the hall and made some changes to the Great Tower.

The castle remained unchanged until 1549 when it was inherited by William 3rd Earl of Worcester, who rebuilt the east side of the hall and added that quintessentially Elizabethan room, a long gallery, which ran the length of the range above the chapel. The north-west and north-east sides of the Pitched Stone Court were rebuilt and a fountain called the White Horse was added in the middle of the fountain court. His buildings can be discerned from the earlier phases by the use of a redder sandstone and rubble rather than ashlar walling. William built garden terraces to give his palace appropriately grand, almost italianate gardens, enhanced by a large lake in the valley below to the north-west. Edward, 4th Earl of Worcester, inherited Raglan in 1589 and added the White Gate, the moat walk around the Great Tower and the unusual 'water parterre' at the head of the lake.

The end for Raglan came in August 1646 when Henry Somerset, 1st Marquis of Worcester and a prominent Royalist, was forced to surrender the castle to the Parliamentarians. The castle was abandoned, never to be lived in again.

The monument is of national importance for its potential to enhance our knowledge of late medieval design and construction. The monument is well-preserved and an important relic of the medieval landscape. It retains significant archaeological potential, with a strong probability of the presence of both structural evidence and intact associated deposits.

The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.

Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
2101		I	Designated	19/11/1953	31/01/2001
Name of Property		Address			
Raglan Castle					

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Monmouthshire	Raglan	Raglan	Raglan	341433	208324
Street Side	Location				
	Magnificently sited 0.25km N of Raglan and reached by private drive from the A 40.				

Description

Broad Class	Period
Defence	

History

C15 stone castle with C16 extensionsand alterations, of 4 building phases 1435-45, 1460-9, 1549-89, and c1600.

Beseiged in 1646, its fall marking 'the effective end of the first Civil War'. It is possible that as first fortification was established c1070, and though the Great Tower stands on an earth motte, the date is uncertain. About 1174 Raglan was held by Walter Bloet, of the Norman family possessed of extensive lands in England, and the Bloets held it until the late C14 when Elizabeth Bloet (d 1420) married successively Sir James Berkeley (d 1405) and Sir William ap Thomas (d c1445). Before the C15 there was a manor house on the site, but with the possible exception of the lowest courses on the S gate nothing survives. Sir William ap Thomas fought at Agincourt in 1415, was knighted in 1426, and in 1432 bought the manor from the Berkeley family and built the hexagonal Great Tower, or 'Yellow Tower of Gwent' and the S gate. His son William Herbert amassed a fortune from trade and financed Edward IV in his bid for the throne. After Edward's accession in 1461, already lord of Usk and sheriff of Glamorgan, he became Chief Justice and Chamberlain of South Wales, and was granted Pembroke, the Gower and other lordships. His role in the elimination of Lancastrian power in Wales gained him in 1468 the Earldom of Pembroke, and he also bought the castle and lordship of Chepstow, making the Herbert family by far the most powerful family in Wales. He lavished money on the building programme, continuing his father's work such that the buildings of c1432-69 form the most substantial part of the castle, united by their polygonal towers. The Earl altered the Great Tower, completed the Fountain Court and built the major part of the Pitched Stone Court. William was executed after the Yorkist defeat at Edgecote in 1469, but his son William (d 1491) prospered with the Yorkist return. He exchanged the earldom of Pembroke for that of Huntingdon. His brother Sir Walter Herbert (d 1507) held Raglan from 1491, entertaining Henry VII's Queen there in 1502. His niece Elizabeth inherited. Her husband, Charles Somerset (d 1526), was Lord Chamberlain to Henry VII and Henry VIII, ennobled in 1504 as Lord Herbert and in 1514 became Earl of Worcester. The 2nd Earl, d 1548, acquired the lands and abbey of Tintern and the 3rd Earl (d 1589) was responsible for the final major works to the castle: the remodelling of the hall, with new buttery and the long gallery above, the office wing in the Pitched Stone Court, together with an ambitious programme of formal gardens. The 4th Earl, d 1628, a Catholic, but Master of the Horse to Elizabeth and James I, Lord Great Chamberlain to Charles I, and patron of Edmund Spenser and William Byrd. He completed the interiors and made minor changes to the basic structure. The 5th Earl raised vast sums for the Royalist cause in the Civil War, becoming 1st Marquis of Worcester and Duke of Somerset. His son Lord Herbert became Earl of Glamorgan: Herbert was the noted inventor whose 'Centurie of Inventions' (1663) includes a prefiguration of the steam engine. After a famous siege Raglan fell to General Fairfax in August 1646 and the whole castle deliberately ruined thereafter. After the Restoration the Somerset family, Dukes of Beaufort from 1682, made their main residence Badminton House in Gloucestershire, leaving Raglan to be plundered for building stone until this was stopped by the fifth Duke after 1756. His youngest son was the noted soldier, created Lord Raglan in 1852, commander of the British forces in the Crimean War. Cefn Tilla was purchased for Lord Raglan as a reward for his services.

Exterior

C15 stone castle with C16 extensions and alterations, the buildings arranged around two courts, and set behind the Great Tower. Four building phases; 1435-45; 1460-69; 1549-89; late C16/early C17.

1435-45: Great Tower influenced by contemporary French towers. Dressed stone, of 4, originally 5, storeys. Originally hexagonal, now only four sides substantially remain. Winding stone staircase to W, latrine to each floor on E. Entrance through four-centred moulded doorway. Above a window framed by drawbridge sockets, enlarged following the addition of a forebuilding (now demolished). Additional doorway later converted into a fireplace with drawbridge socket used as flue. Doorways in the vestibule to former great chamber. Gun-loops and cross-slits to the basement kitchen containing large fireplace, stone corbels. To the great chamber single-light windows, and cross-slits. To the 2 floor a fireplace with four-centered arch, 2-light windows with seating embrasures and later brick niches. To the 3 floor a mixture of single and double light windows.

South Gate; Originally the main entrance to the castle. 3 storeys, 2 centered arched opening set within depressed

frame. Two single light windows to the first flor, one of which is blocked. To the passageway some carved corbels retain elements of fan tracery. Winding stone stair.

The S and W wall of the Hall are also from this period. The S wall retains the weathered coat-of-arms of the 3rd Earl of Worcester to stone plaque above former dais, beneath former flat-headed window retaining some tracery. The W wall retains some corbels for the former roof of the hall and to its W face some stone steps in the former chapel.

1460-69: Apron wall with corner towers to the Great Tower. Great Gate of 2 half-hexagonal 3-storey towers with basements and machicolations with gargoyles. Dressed sandstone. Latrine to the SW angle. Single-light windows with pointed traceried heads. Circular gunloops to the basements. Portcullis grooves. Some remains of stone vaulting to the side walls of the entrance passage between the two towers of the Great Gate. SW side; doorways from either side of the gate-passage to ante-chambers. To the first floor the principal withdrawing room with C16 cross-wall inserted later with fireplaces. Apartments retain carved shields and badges held within slender stone shafts which enclose the windows to first floor.

The Closet Tower: designed to integrate with the half-hexagonal towers of the Great Gate, similarly 3-stages with machicolations and basement. Ground floor room with latrine and fireplace. Doors to stair and basement. To the courtyard later large rectangular gallery windows to the first floor with 2 and 3-light stone mullioned windows above. The Kitchen Tower: hexagonal with 2 large fireplaces. Stone with brick refacing to N-E face. 3 storeys and basement. "- light windows with seating embrasures to the top floor. Stone steps down to vaulted wet larder in basement with two 4-centered windows and various gun loops.

Buildings in Fountain Court. Largely destroyed to ground level to courtyard. Two projecting towers to curtain wall with cross-slits, each with latrine. Single light windows to outer wall. Largest tower contains the grand stair to the former living apartments with four-centered moulded doorway. Three fireplaces. E wall of C15 chapel, corbels in the form of human heads with some stone vaulting attached. End windows of the Long Gallery, part of a Renaissance fireplace.

1549-89; The Office wing runs from the Closet Tower to the Kitchen Tower on the site of earlier wing. Largely destroyed except for outer curtain wall with half-hexagonal projecting tower. 3 fireplaces.

The Pantry and Buttery: Buttery originally 2-storeys, enlarged to 3 and subsequently lengthened to complement Hall. Steps from Buttery down to basement, access doorway from buttery to Hall. 2 projecting polygonal towers to the curtain wall, one with winding stone stair and single-lights, the other with 2-light windows to N face, single and (later), 2-light to side. Large mullion-and-transom windows to top floor.

The Hall: door from Buttery, oriel window to Pitched Court side of hall. 3-stage buttress separates 2 large flat-headed mullion-and-transom windows with trefoil cusps. Porch with four-centred doorway, and 2 3-light flat-headed windows with trefoil cusps to each light. Fireplace.

Stone bridge from South gate to former Bowling Green.

Late C16 to early C17: The White Gate, two half-hexagonal towers joined by a guardroom. Not built as a defensive structure and largely destroyed except for part of the S wall of one storey with with single light window, sculpture niche and basement with arrow-slits.

Interior

Reason for designation

Listed Grade I as one of the last medieval castles to be built, of national architectural and historical importance.

Cadw : Full Report for Listed Buildings

[Records 1 of 1]

Registered Historic Park & Garden



Details

Reference Number	Name	Grade	Date of Designation	Status
PGW(Gt)42(MON)	Raglan Castle	I	01/02/2022	Designated

Location

Unitary Authority	Community	Easting	Northing
Monmouthshire	Raglan	341441	208320

Broad Class	Site Type	Main phases of construction
Gardens, Parks and Urban Spaces	Formal terraced gardens, former lake and water parterre, walk with shell niches.	1550-1628.

Description

Summary Description and Reason for Designation

Raglan Castle, a late medieval castle, lies above the village of Raglan. It is registered as a very rare survival of an outstandingly important sixteenth- and early seventeenth-century garden layout which was one of the most advanced gardens of its date in the country. The gardens formed part of the setting for the castle which itself was built to be more decorative than defensive. The castle is Grade I Listed (LB 2101) under guardianship, and the entire area of the castle and the garden earthworks is a Scheduled Monument (SM MM005). The gardens were made by the 3rd and 4th Earls of Worcester, between 1550 and 1628 and were laid out on a grand scale involving massive earth moving.

North-west of the castle are three long terraces built out over the steep slope, and retained by a huge revetment wall. They are separated by steep high grass slopes, originally bounded by walls 30 feet (9 metres) high, according to a

description of 1674. At the south-west end of the top terrace are the brick footings of a small square summerhouse, and at the north-east end of the main, central, terrace stone steps to the upper terrace are visible. There is some evidence for balustrading in the garden, perhaps along the tops of the terraces.

Below, on level pasture in the valley of the Wilcae Brook, is the site of the 'great Poole', with evidence for an island, and to the west of the terraces its earthen dam, now breached by the stream. Beyond the north-east end is a large boggy rectangular area of banks and ditches, all that remains of a water parterre. Its diamond and triangular-shaped islands, portrayed on a map of 1652, can still be seen.

South-west of the castle a square level area with raised terraces around two sides is the 'garden plot' described in 1674. Above it, to its south, on high revetment walls, is the grass bowling green accessed by stone steps. Below, is a large rectangular terrace bounded by steep scarps on its outer sides, reached by steps. This overlooks the valley of the Wilcae Brook below the dam. Below this is a further narrow shallow terrace. On the 1652 map the valley below is described as 'Hopyard', with an orchard on higher ground on the east slope of the valley.

From either end of the dam former water channels lead from each end of the dam to a large square earthwork at the southern end of the field, a former water garden with four square islands separated by water channels, and possibly of fifteenth century date.

The Moat Walk is a curving gravelled walk running around the outside of the moat around the castle's fifteenth-century keep. Evenly spaced out along the walk are fifteen brickwork semi-circular niches, originally decorated and holding statues of Roman emperors, now gone. Within the castle, in the Fountain Court, is the square stone base of a fountain, called the White Horse fountain, in existence by 1587.

Setting - Raglan Castle lies north of Raglan village, on the north side of the A40. It is surrounded by farmland except on the east side where the buildings of Castle Farm abut the castle grounds.

Significant views - From the north-west terraces there are fine views across the nearby countryside to the Black Mountains beyond. From the south-west there are views towards the South Wales valleys.

Source:

Cadw 1994: Register of Parks and Gardens of Special Historic Interest in Wales: Gwent, 130-2 (ref: PGW (Gt) 40).

Cadw : Registered Historic Park & Garden

[Records 1 of 1]

Appendix 7: Illustrative Masterplans

Option 1



Option 2



Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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