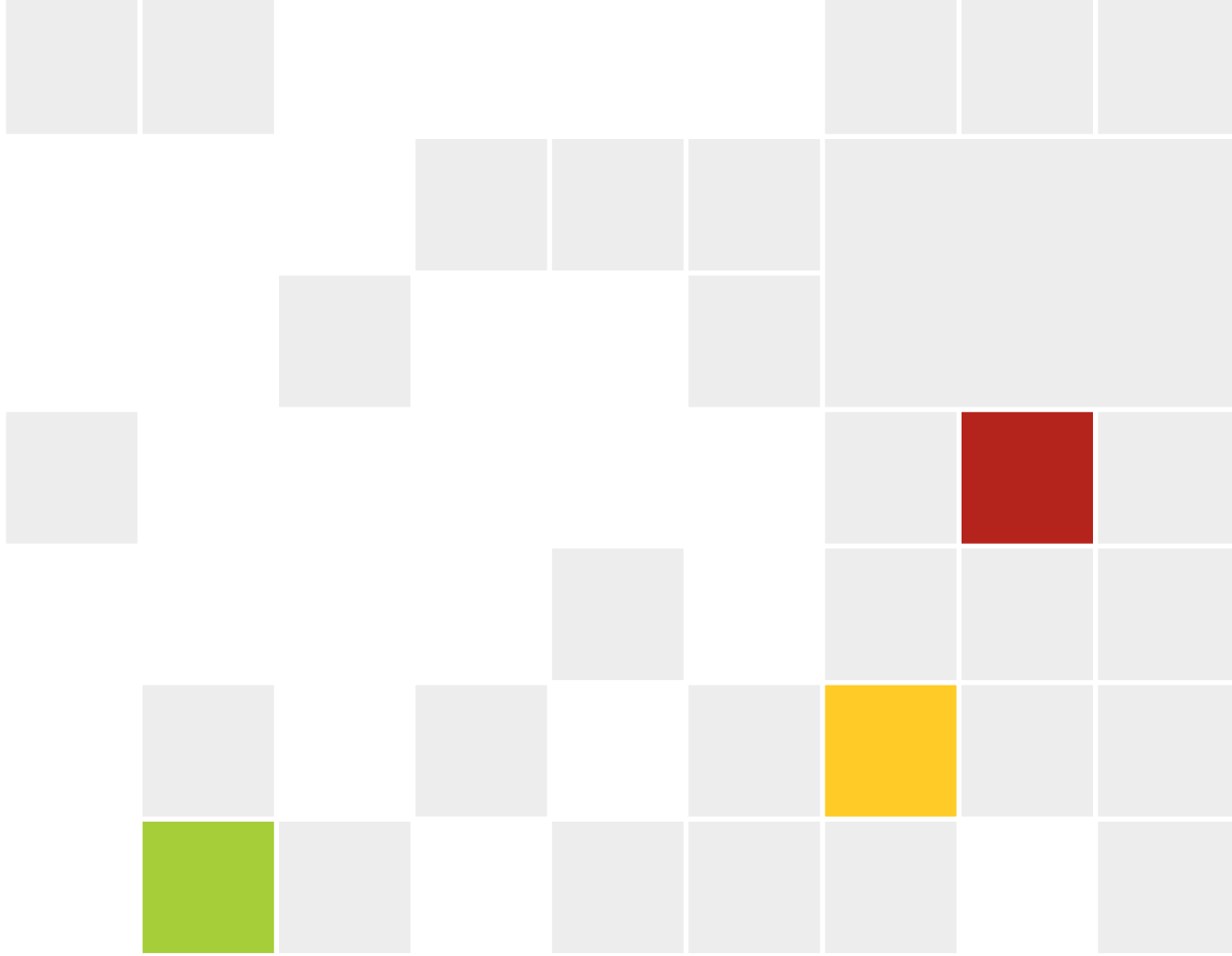




Land West of Rockfield Road



Monmouthshire Replacement LDP



Boyer

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1. INTRODUCTION

- 1.1 This document provides the overarching details of the opportunity for the residential development of up to 130 dwellings including affordable housing provision at Land West of Rockfield Road, Monmouth.
- 1.2 The submission is made on behalf of Hallam Land Management (HLM) in response to the Monmouthshire Replacement Local Development Plan (LDP) Review Preferred Strategy and Candidate Sites Assessment, as well as the Stage 2 Call for Candidate Sites.
- 1.3 The document describes the development site as well as outlining the importance of the site's roll as a suitable, deliverable and viable strategic allocation for residential development within the Monmouthshire RLDP. HLM has an interest in the land at Rockfield Road, Monmouth, which was promoted by Boyer as part of the initial call for candidate site in November 2018. The site is recorded in the February 2019 Index of Candidate Sites for Development / Redevelopment under reference CS0076.
- 1.4 The site's planning history is discussed in detail in Section 2. In summary there is a live planning application for 130 units on the whole site, while there is a live planning permission for 70 units on the eastern 2.86ha of the site.
- 1.5 In accordance with the requirements for the Stage 2 Candidate Site submission this report is supported by a number of technical reports and surveys from the consultant team, comprising of the following:

- Candidate Site Submission Form;
- Masterplan prepared by FPCR (May 2019);
- Agricultural Land Classification prepared by Land Research Associates Ltd (March 2008);
- Transport Assessment prepared by Brookbanks (July 2016);
- Landscape and Visual Appraisal prepared by FPCR (July 2016);
- Flood Risk Assessment and Addendum (June 2019) prepared by Brookbanks Consulting Ltd;
- Geo-Environmental Phase 1 Desk Study by Brookbanks Consulting Ltd (June 2016);
- Ecology Report and Candidate Site Submission Form prepared by FPCR (August 2019);
- Archaeological Assessment prepared by Orion Heritage (June 2016);
- Phosphate Mitigation Strategy prepared by Brookbanks (August 2021); and
- Viability Assessment (August 2021).

1.6 This document provides headlines from the consultant team for the environmental and technical findings relating to the site and demonstrates the suitability of the site for development when assessed against national and local planning policy, as well as relevant standards and legislation.

1.7 While the eastern part of the candidate site has a live planning permission for 70 dwellings, the western part of the site does not have any formal planning status as the 130 unit application has not yet been determined. We would urge the Council to include an allocation for the whole site and this document (and the wider submission) demonstrates the site is suitable for development and is deliverable.

2. SITE DESCRIPTION

- 2.1 The candidate site submission relates to the 4.33ha site identified as Land West of Rockfield Road, Monmouth (Candidate Site reference no: CS0076).



Figure 1 – Site Location: Land West of Rockfield Road

- 2.2 Figure 1 above illustrates the location of the site and its boundaries. The site adjoins, and is contiguous with, the north western edge of the main town of Monmouth. Additionally the site is an undeveloped greenfield site. Its boundaries comprise established hedgerows, with intermittent mature and semi-mature tree specimens.
- 2.3 Along the eastern boundary of the site, between the hedgerow and Rockfield Road, is a drainage ditch which runs underground at the point of the roundabout leading into the Rockfield Estate. This ditch includes channel vegetation. A ditch also lies beyond the western boundary but has been cleared of vegetation.

- 2.4 A fenced public footpath crosses the central section of the site in a north-south direction. The footpath connects with an existing public footpath route (footpath ref. 127) within the Rockfield Estate, between Trafalgar Close and Levisfield Close.
- 2.5 A vehicular access point from Rockfield Road and leading into the field is situated within the north-eastern corner of the site, immediately to the south of Newbold's Paddock.
- 2.6 The site's southern boundary is contiguous with the curtilage of residential properties situated on Hamilton Way, Levitsfield Close and Trafalgar Close, which form the northern extent of the Rockfield Estate. The western boundary is co-terminous with Charles Church's Parc Glyndwr housing development, which extends the northern extent of the Rockfield Road estate in this location.
- 2.7 The eastern boundary of the site is formed by Rockfield Road (B4233). The northern boundary comprises a mature hedgerow with fields beyond. A residential property (Newbold's Paddock) adjoins the north eastern corner of the site.
- 2.8 In terms of sustainability the site is located in close proximity to a number of local facilities including:
- Co-op retail store – 760m;
 - Rockfield Community Hub - 780m;
 - Spar retail store - 1.36km
 - Monnow Vale Health and Social Care Facility - 1.17km; and
 - GP Surgery (Castle Gate Medical Practice) – 1.4km.
- 2.9 A number of bus services are provided nearby including route W5 which operates closest to the site, along Kingswood Road. This bus route is a circular route through Monmouth between the bus station and the Rockfield Estate, an established residential development off Rockfield Road. The first bus exits the bus station at 8:30am, calling at Rolls Avenue and Ash Lane. W5 continues onto the Rockfield Estate stopping at 8:45am before returning to the bus station at 8:55am. The next buses leave the bus station at 9:30am and 10:00am before continuing on an hourly basis. The last bus leaves the bus station at 4:15pm stopping at the Rockfield at circa 4:32pm.
- 2.10 Monmouthshire Council has confirmed that the W5 is a 'hail and ride' service such that there are no designated bus stops, the service will stop if hailed. There is a public footpath crossing the application site that connects to Kingswood Road and as a result Route W5 operates within 120m of the site boundary, with all the potential units being within 400m of public highway and Route W5.
- 2.11 Further full site descriptions are provided in the individual supporting technical documents and surveys outlined in Section 4.

Planning History Background

2.12 According to Monmouthshire County Council's online planning register the site has an extensive planning history as demonstrated in the below Table 1. Outline planning consent for was granted in 2019 for the eastern part of the site.

Table 1 - Planning History

Planning Reference No.	Description	Decision
DC/2008/00576	Residential Development of up to 145 dwellings	Appeal dismissed
DC/2016/00870	Outline planning permission for the construction of up to 130 dwellings, open space, play space, play space provision, landscaping and associated infrastructure.	Pending consideration
DC/2017/00539	Outline planning permission for the construction of up to 70 dwellings, open space, play space provision, landscaping and associated infrastructure.	Granted 05/02/2019 – related to eastern 2.86ha of the candidate site.
DM/2019/00733	Variation of Condition 12 (to allow flexibility of the foul drainage), relating to application DC/2017/00539.	Pending consideration
DM/2019/02060	Reserved matters of appearance, landscaping, layout, scale and associated works for a scheme of 70 new homes (relating to DC/2017/00539).	Pending consideration
DM/2021/00487	NMA relating to application DC/2017/00539; amended wording to condition 12 to allow flexibility, so that there can either be a connection to Rockfield Waste Water Treatment Works, which lies to the north of the site, or to Rockfield Road/Monmouth Town Sewerage Pump Station.	Pending consideration

2.13 To summarise, it should be noted by way of context, the only reason 130 units were not granted in 2019, when the 70 unit scheme was, was due to foul drainage capacity issues which have since been resolved with Welsh Water. Moreover, the sole reason for the delay to the NMA and RM applications is due to phosphates, a technical issue affecting all proposed development in the north of the County. A phosphates technical note has been submitted in support of the Candidate Site submission and demonstrates the site promoter's commitment to overcome this issue.

3. LOCAL DEVELOPMENT PLAN REVIEW

Preferred Strategy

- 3.1 This supporting document and the accompanying technical documents for the Phase 2 Candidate Site Assessment, sit alongside the representations made on behalf of HLM in response to Monmouthshire County Council RLDP 2018-2033 Preferred Strategy (PS).
- 3.2 Overall we agree and support the Council's Preferred Growth Option of Option 5 – Population-led projection which best meets Monmouthshire's RLDP's vision.
- 3.3 As detailed in our Growth and Spatial Options submission, which should be read alongside this representation, Monmouthshire faces significant housing issues, including high house prices compared to the Welsh average, the increase in house prices as a result of the removal of the Severn Bridge tolls, a need for affordable housing in both urban and rural areas, and the need for a range of housing to meet the needs of both the ageing population and housing to attract/retain the younger working population. Increasing the annual housing requirement should in turn encourage the delivery of more housing (when combined with appropriate planning policies), which will provide a means of addressing the various housing issues described.
- 3.4 While sustainable travel is a key concern of national policy, we agree with the Council's recognition that the pandemic has shifted people's focus to quality of life, house size and access to green space, rather than commuting times. We are of the view that this has been translated into a strategy which seeks to provide a range of housing to meet all needs and retain younger and working age people. To this end we support the Council's plan to make provision for a total of 8,366 homes to deliver a housing requirement of 7,605 homes over the Plan Period 2018-2033, this figure will equate to 507 dwellings per year. This provision is based on a 10% flexibility allowance which will be given further consideration at Deposit Stage. We consider the 10% flexibility allowance should be increased to ensure sufficient homes can be delivered in light of the phosphates and delays to strategic sites. In order to meet this housing requirement the Council have proposed 3,658 homes will be allocated through new sites. However, HLM consider the imposition of a flexibility allowance which exceeds the 10% suggested. The justification for this relates to the fact that dwelling growth in Monmouthshire in recent years is as follows:
 - 5 year average – 310dpa
 - 10 year average – 285dpa
 - 15 year average – 269dpa
- 3.5 These averages fall well short of the adopted 2011-2021 LDP's annual requirement would therefore encourage the Council to consider the imposition of a larger flexibility allowance.

- 3.6 Moreover, the latest annual Monitoring Report (which covers the period from 1st April 2019 to 31st March 2020) identifies that, over the LDP plan period to date, a total of 2,581 homes had been delivered against a requirement of 4,500 homes. Even with the adopted LDP utilising a 10% buffer, the under-delivery of housing compared to the requirement is so substantial as to warrant the application of a larger buffer.
- 3.7 Also, consideration should be given to the approach taken by other South Wales Authorities, including Bridgend County Borough Council, who in their Deposit Replacement LDP propose applying a 20% buffer, with the Deposit stating that:
- 3.8 “The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered.”
- 3.9 Additionally, we agree and support the principle of Spatial Option 2, which offers a proportionate distribution of growth, similar to the existing strategy. We support that growth will be channelled towards the most sustainable settlements that benefit from significant services, facilities, employment opportunities and active travel networks.
- 3.10 Monmouth is identified as a Primary Settlement within the Preferred Strategy which has excellent road links and a range of frequent bus services connecting the settlement to the South Wales cities, Gloucestershire and Herefordshire. According to the PS, facilities and services within Monmouth score well within the sustainability assessment, in addition to it being one of the most self-sufficient settlements in terms of employment. To this end, with the potential for 130 dwellings to be delivered, with 70 dwellings secured through outline planning permission on the eastern parcel, this site is genuinely deliverable and can contribute to the identified housing need within the locality.
- 3.11 Accordingly there appears to be no reason why the site should not progress and be included as an allocated site within the Deposit Plan. The candidate site lies close to the Strategic Growth Area G – ‘Land west of Monmouth’ which includes candidate sites CS0051 (Croft y Bwla) and CS0078 (Land adjacent to Croft y Bwla), the latter of which being immediately north of the land west of Rockfield Road (CS0076), yet the Rockfield Road site itself has been excluded.
- 3.12 As detailed in Monmouthshire’s ‘Review of Candidate Sites against the Preferred Strategy’ consultation document, the candidate site has been categorised as scoring ‘green’ and so has been considered to be compatible in principle with the Preferred Strategy.

Welsh Government Future Wales: The National Plan 2040

- 3.13 HLM are committed to ensuring the development complies with Future Wales National Plan 2040. This spatial plan sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people.
- 3.14 The Well-being of Future Generations (Wales) Act 2015 demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales. The seven well-being goals – for national government, local government, local health boards and other specified public bodies – detail the ways in which these bodies must work, and work together to improve the well-being of Wales.



- 3.15 Future Wales 2040 outlines the strategic placemaking principles as:

Mix of uses - To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods;

Variety of housing - To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale - To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density - To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street Network - To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary.

Plot based development - To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots.

Green Infrastructure - To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration.

3.16 Future Wales seeks to ensure that places are socially mixed and cater for varied lifestyles, enable active and healthy lives, make new homes energy efficient and provide a framework for different uses and types of housing to be integrated within neighbourhoods

Local Development Plan Examination

3.17 The current MLDP and development strategy was adopted in 2014. Boyer represented our client through the MLDP preparation and examination process. Ultimately, the land controlled by HLM West of Rockfield Road site was not included as a development allocation in the MLDP. Notwithstanding this, the following matters raised during the examination process are significant and highlighted below as being of particular relevance in this instance:

- The wider HLM land was promoted with the support of demonstrable evidence (the same evidence as that recognised as valid by the s78 Appeal Inspector) as being suitable and deliverable for residential development of the scale currently envisaged.

- The Council acknowledged that the wider HLM land (and subject site at the time) was a wholly suitable and deliverable site for residential development of the scale proposed. It was only not selected as an allocation owing to the overall housing number required and the Council's preferred strategy of relying on large strategic sites to meet objectively assessed housing need.
- The MLDP housing land supply identified by the Council (and eventually adopted) was/is over-reliant on strategic sites, lacking the variety to ensure a clearly deliverable five year housing land supply in the early parts of the plan period.
- As a result of the above, additional land should be identified to boost the housing land supply and ensure objectively assessed need can be met in a manner consistent with the MLDP strategy, hence the positive planning history and lack for 5 year supply after the plan was adopted.

4. TECHNICAL ASSESSMENTS

- 4.1 In accordance with the requirements for the Second Call for Candidate Sites a number of technical supporting studies have been prepared and are submitted to clearly demonstrate the site's deliverability.
- 4.2 The full documents are provided separately, however for ease a summary of main conclusions of each technical discipline is provided below.
- 4.3 As aforementioned there is a live outline planning application for 130 dwellings (submitted in 2016) and a live planning permission for 70 dwellings granted in 2019. These applications are supported by a full suite of technical documents, which are already in the public domain (with the exception of the phosphate mitigation strategy and viability assessment) and go above and beyond what is necessarily expected to support the promotion of a candidate site. For completeness, these documents have been included as part of this candidate site submission and each technical issue is summarised below to demonstrate the suitability of the site for development. =

Masterplan

- 4.4 In combination with the consultant team, and their technical reports outlined within this section, FPCR have produced the accompanying Drawings which provides the Masterplan, Framework Plan, GI illustrative masterplan and Access Plan, as well as covering issues such as constraints and opportunities; character areas; movement; open space; urban design and phasing.
- 4.5 The accompanying masterplan illustrates the site accommodating up to 130 dwellings, open space, play space provision, landscaping and associated infrastructure within the site. The development is arranged in two separate but linked residential parcels either side of the existing public footpath across the site. Focused on the existing footpath, the central area of the site includes an integral and highly accessible column of public open space. The space includes a local equipped area of play (LEAP), a local area of play (LAP) and food growing area.

- 4.6 The access is shown to be constructed in the form of new priority junction onto Rockfield Road. It is consistent with the access proposal agreed as being appropriate and policy compliant during the course of the previous application at the site. The proposed access from Rockfield Road will replace the existing agricultural access to the site in the north-eastern corner. It will run east-west across the site with residential development parcels adjoining it and accessed via secondary streets and private drives. Off-site highway improvements are proposed to the Wonastow Road / Rockfield Road junction and to the Cinderhill Street / Portal Road junction. The means of access replicates similar approaches to residential access points along Rockfield Road. Internally, the access will connect to a network and hierarchy of streets. Public footpaths and cycleways will ensure inclusive accessibility across the site by a range of modes of transport.
- 4.7 The hedgerows, ditches and tree standards bounding the site are recognised as having nature conservation value and provide habitats for a range of species. All hedgerows will be retained with the exception of a small section of hedgerow on the eastern boundary to accommodate the vehicular access to the site. A 10 m wide buffer between retained hedgerows and proposed built development on the northern and eastern boundaries will provide additional informal open space and protect the prevailing landscape character of the site.
- 4.8 Compensatory hedgerow planting will be introduced to the northern perimeter of the proposed detention basin along with structural planting of native shrubs and trees along the site's northern boundary. The provision complements the soft edge approach to the scheme, whereby the corner or edges of the fields will incorporate a grassland buffer to protect field boundaries and enhance the foraging habitat for bats and birds.
- 4.9 The existing public footpath will be retained and enhanced with planting, continuing the landscaped setting of the footpaths within the adjacent residential area. Drainage infrastructure in the form of an attenuation pond is proposed within the south-eastern corner of the site, being close to the low point of the site and adjacent to the watercourse receptor channel along the eastern boundary. The basin will be designed to be functional, to control storm water discharges from the site and improve water quality, as well as having biodiversity and landscape character benefits for the site.
- 4.10 It is evident that a significant amount of time and investment has been committed to demonstrating the deliverability of the site and producing the proposed masterplan.
- 4.11 A full and detailed overview of the site, and the approach to the masterplan is provided within the supporting plans submitted.

Ecology

- 4.12 Survey based ecology appraisals of the site have been undertaken by FPCR in August 2007, September 2011, May 2013, May 2016 and August 2019. Subsequent survey work relation to dormice has also been undertaken on the referenced candidate site in 2020; as has a Phase 1 Habitat (update) walkover survey which confirms that there has been no material change in baseline conditions at the site since 2019. Therefore, the Ecological Appraisal (FPCR, August 2019) has been deemed to be wholly relevant and appropriate for use in-line with the Requirements for LDP Candidate Site Assessment detailed at Section 2 of the Local Plan Ecological Site Assessments in Monmouthshire CS Methodology (Monmouthshire County Council, December 2020).
- 4.13 In summary, three sites of international nature conservation interest have been identified within 5km of the Site. The River Wye SAC is located 1.6km to the south-west, Wye Valley Woodlands SAC is located 2.5km east and the Wye Valley and Forest of Dean Bat SAC 3.6km south-east of the Site, respectively. Given the relatively small-scale nature of the proposed development and its distance from the designations it is considered unlikely that proposals will result in any adverse impacts to these designated sites.
- 4.14 Some hedgerow loss will occur through the creation of access into the Site and through the requirement for visibility splays. This loss would be compensated for the creation of new native species-rich hedgerow creation along this boundary and around the edge of the proposed balancing pond in the south-eastern corner of the Site and through the structural planting of native shrubs and trees, along the Site's northern boundary as to buffer and reinforce the existing hedgerow.
- 4.15 Bird boxes will be incorporated into the buildings and on retained trees to provide a variety of additional nesting habitats. The incorporation of bat boxes into the design of the buildings has been proposed.
- 4.16 Landscape proposals of the site would seek to use native species of local provenance, whilst any areas of open green space would be utilised for the benefit of wildlife.
- 4.17 Overall, the proposed site will ensure necessary preservation and, where possible, enhancement of the natural environment as part of the high quality design approach pursued.
- Phosphates
- 4.18 Brookbanks were appointed by HLM to complete an initial appraisal of the Total Phosphorus (TP) budget for the proposed development site and analyse options for providing a phosphorus neutral development.
- 4.19 The report concluded for installing a package treatment plant onsite means the following is required to mitigate the additional 9.09kgP/year from the proposed development:

- Fallow 12.0ha (if located in the Mynwy catchment) or 6.55ha (if located in the Gwy catchment) of lowland grazing land (with marginally higher figures for general crop land of 12.50ha and 6.75 ha respectively)
- Or Install 0.76ha highly functioning constructed wetland

4.20 While this solution would not be required should phosphate capabilities be included in Welsh Water's AMP8 programme for the Monmouth treatment works, this demonstrates that the site could be delivered with only a relatively small quantum of offsite fallowing / wetland construction. A PTP has been accounted for in the submitted viability appraisal.

Landscape and Visual

- 4.21 A Landscape and Visual Appraisal was prepared by FPCR in July 2016 which concluded that although the boundary hedges are of some local landscape value the main part of the site contains no significant landscape features.
- 4.22 It is important to note that although we are not located within Strategic Site G, it would enclose the Candidate Site. Additionally, Site G has been assessed as having the least significant landscape effect of all of Monmouth's 3 options and so development at and in close proximity to this location should be deemed acceptable in landscape grounds.
- 4.23 Aside from the break in the Rockfield Road hedgerow to accommodate the proposed new access, the proposed allocation development would retain all of the site's perimeter hedges and trees. These would be strengthened and enhanced with new native tree and hedgerow planting.
- 4.24 The site is well contained in the wider landscape by a combination of the built form of Monmouth to the south and to the west, the well treed northern hedgerow, overlapping vegetation within the surrounding landscape, and by rising landform which includes the wooded ridge at Ancre Hill and gently rising land at Croft y Bwla.
- 4.25 Whilst there would be some adverse landscape and visual effects at the outset (Year 1) on account of the permanent loss of the field and the change from grassland to built development, it is judged that these effects would be localised to the site and effects would be limited in their extent.
- 4.26 It is considered that the site's landscape character has the ability in which to absorb development of the scale and type proposed without causing any unacceptable long term landscape and visual harm.
- 4.27 Consistent with the design principles mentioned, the integral green infrastructure provision will include formal and informal open space, co-ordinated landscape strategy, protection and enhancement of existing assets and careful consideration of the drainage strategy.

- 4.28 The landscape design will complement and enhance the site layout and will continue the strong landscaping features which are distinctive of the Rockfield Estate and the Parc Glyndwr residential development to the west. Tree planting will be used to soften the development and reinforce the transitional character of the development between settlement and countryside.
- 4.29 According to Monmouthshire's Landscape Sensitivity Study (October 202), the site is not considered to be of high, medium or low sensitivity owing to its location which is depicted in the extract below.

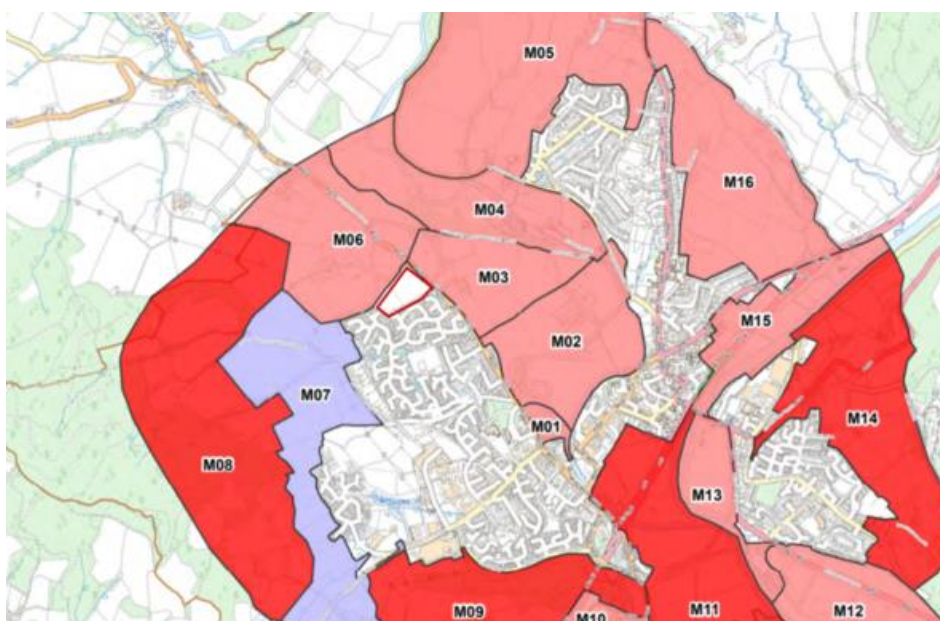


Figure 1 - MCC Landscape Sensitivity Study

- 4.30 To conclude, FPCR's professional opinion is that the Land West Rockfield Road site is a logical site within which to undertake development and that the scheme, in its present form, is a sensitive design which responds to the constraints of the site.

Archaeological and Heritage

- 4.31 Analysis of available archaeological, historic, topographical and land use information has confirmed that the site has low potential for archaeological remains of all periods. The assessment draws together available information on designated and non-designated heritage assets, topographic and land-use information so as to establish the potential for non-designated archaeological heritage assets within the study site and the setting and significance of nearby designated heritage assets. The assessment includes the results of a site survey, an examination of published and unpublished records and charts historic land-use through a map regression exercise.

- 4.32 This assessment has established that based on the results of the archaeological evaluation that was undertaken on the site in support of a previous planning application, the site has low potential for archaeological remains of all periods. Consequently, the proposed development will have no archaeological impacts and no further archaeological investigation is necessary either pre- or post- the determination of the current planning application.

Agricultural Land Classification and Soil Resources

- 4.33 The Agricultural Land Classification Map indicates a substantial portion of the site as Grade 2 with the remainder being Grade 3. An Agricultural Land Classification Report was prepared by Land Research Associates Ltd which concluded the majority of the field lies comprises Grade 2 land (85%) which is limited only slightly in agricultural use by restricted workability as a result of the long field capacity period. Additionally, 15% of the site comprises sub-grade 3a mainly in the eastern end adjacent to the stream.
- 4.34 As recommended in the ALC report, construction operation of any future development will aim to re-use all topsoils either on or off and also maintain subsoil permeability in the gardens and green spaces in order to regulate run-off.

Flood Consequences and Drainage

- 4.35 Brookbanks Consulting Ltd prepared a Flood Consequence Assessment for the site in 2016 which identified no prohibitive engineering constraints in developing the site. An addendum to this assessment was prepared in June 2019 as a response to the Welsh Water objection on planning application DC/2016/00870 (130 dwellings). Welsh Water provided additional information confirming that a connection point had been identified north of the proposed development, which ultimately drains to Rockfield Road Waste Water Treatment Works which could accommodate and support up to 70 dwellings. To allow for any additional dwellings would require the undertaking of a feasibility study and may require additional improvements at the WwTW to accommodate the development.
- 4.36 A modelling report has been undertaken by Welsh Water to determine a suitable proposal to accommodate 130 dwellings, which has identified a proposed solution for the Site. Consultation is continuing with Welsh water, and a sewer requisition has been requested and submitted to further develop the design. According to Welsh Water's AMP Business Plan (2020-2025) 'the efficient and timely provision of water and wastewater connections and support to all new development is a crucial part of their role.' To this end the AMP7 plans were co-created with developer customers for Welsh Water to deliver its obligations within the specified timescales so this does not hold up the wider development.

- 4.37 With regards to portable water, Welsh Water has confirmed that the Monmouth area is currently being modelled and includes for the 130 dwellings at Rockfield Road. The modelling works are still being completed, and discussions with Welsh Water continue to determine how the Site can be delivered, without detriment to the wider network.

Transport

- 4.38 A Transport Assessment was prepared by Brookbanks in 2016 which proposed to construct an access point off Rockfield Road via a new priority junction. In line with best practice, the design of the access point is informed by detailed survey evidence of the existing highway network, forecast trip analysis from the site and prevailing safety standards. It will ensure a safe and acceptable flow of traffic into and out of the site, without any significant adverse impact on Rockfield Road or the surrounding network.
- 4.39 The site is sustainably located and accessible by a range of modes of transport, including on foot, by bike, public transport (bus) and private car. The proposal will not create any new accessibility barriers within the surrounding area. Indeed, it will promote alternative means of transport by providing future residents with the opportunity to walk and cycle to local services and transport links. The scheme is accessible and sustainable from a transport perspective and accords with the requirements of the Active Travel (Wales) Act (2013), as shown in the Active Travel Routes Map below.

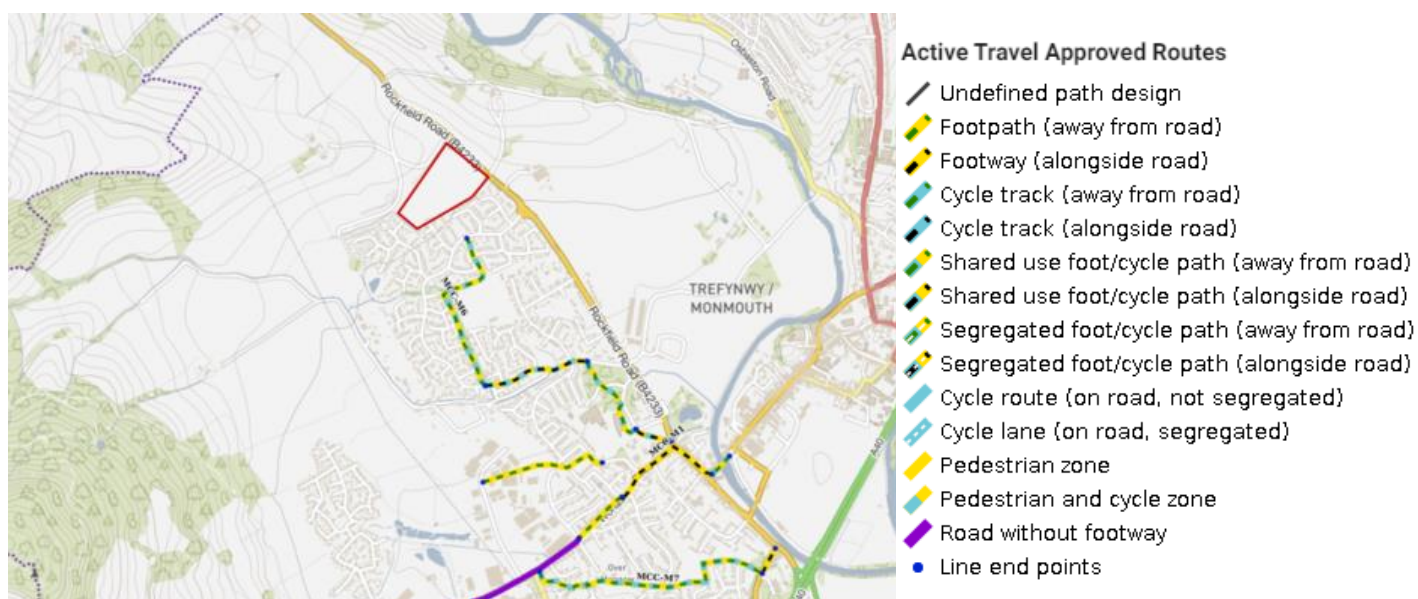


Figure 2 - Map of Active Travel Approved Routes

- 4.40 The traffic generated by the development will not have any significant or severe impact on the capacity and flow, and safety of the local highway network. This conclusion takes into account the off-site highway improvements identified at the Wonastow Road / Rockfield Road and the Cinderhill Street / Portal Road junctions. The applicant would be pleased to enter into a commitment to deliver these improvements as part of the proposal.

Climate Change

- 4.41 HLM are committed to ensuring the development compliments the Council's Climate Change agenda. In line with the Welsh Government's proposed changes to Building Regulations in March 2021, these changes seek to make new homes energy efficient and future proof them for low carbon heating systems. In order to help meet this new agenda this Candidate Site submission has incorporated the following design considerations into the submitted masterplan:
- 4.42 Efficient use of land and co-location of uses – the site is sustainably located on the edge of the settlement;
- Avoid flood risk areas – the site is not at risk of flooding and so flood risk areas within the locality have been avoided;
 - Sustainable urban drainage schemes (SuDs) – owing to the scale of development a SuDs feature has been proposed which will be designed and built in accordance with the Statutory SuDs Standards published by Welsh Government and will be submitted to a SuDs Approving Body for approval;
 - Digital Infrastructure – the development is proposed to be built to enable the integration of digital infrastructure;
 - Green Infrastructure – the masterplan illustrates an extensive green infrastructure scheme which has considered the LPA's green infrastructure policies in detail. As a result these measures will help reduce the scheme's carbon footprint and mitigate increasing temperatures whilst also reducing any risk of flooding;
 - Waste reduction – sustainable construction techniques will be explored during the build phase as well as the benefits of using local supplies.
- 4.43 Moreover, opportunities to increase the renewable and low carbon energy generation capacity of the site will be considered in detail. HLM strive to reduce carbon emissions and so savings in CO2 emissions from energy use will be explored.

- 4.44 In May 2019 MCC declared a Climate Emergency. Accordingly, the LDP Preferred Strategy (June, 2021) contains a specific objective with regards to climate change (Objective 17). Objective 17 aims to strive to limit the increase in global temperatures to 1.5oC, supporting carbon reduction through a variety of measures including the use of renewable energy, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality Green Infrastructure.
- 4.45 As set out at Paragraph 5.1 of MCC's 'Tackling Climate Change Candidate Sites Guidance Note', land being promoted for development as part of the candidate site process needs to ensure that climate change adaptation and resilience measures are incorporated within proposals. In accordance with this guidance, the viability appraisal (undertaken to demonstrate the Candidate Site's viability) has taken full account of climate change considerations.
- 4.46 It is set out within PPW 11 that Welsh Government planning policy recognises an energy hierarchy: "The Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning...Reducing energy demand and increasing energy efficiency, through the location and design of new development, will assist in meeting energy demand with renewable and low carbon sources" (Paragraph 5.7.13). In accordance with PPW, sustainable design principles form an integral part of the design and layout of the proposed development at Rockfield Road, Monmouth.
- 4.47 In accordance with the energy hierarchy, potential options which are being explored in relation to climate change mitigation include the following.

Site Location and Layout

- 4.48 The layout of the design will assist in reducing energy demand as follows:
- 4.49 Efficient use of land and co-location of uses – the proposed allocation comprises development in a highly sustainable location, which will promote fewer travel movements and contribute towards placemaking objectives. A well designed and connected network will ensure that people are given the maximum choice as to how they travel including by bus, walking and cycling. An allocation on the Candidate Site will ensure that development is directed to areas that minimise the need to travel and maximise the use of sustainable modes of transport, with walking and cycling actively promoted to and from the Candidate Site.
- 4.50 Sustainable urban drainage schemes (SuDs) – a SuDs-compliant drainage scheme will be implemented on the site which will need to be approved by the SAB.

- 4.51 Digital Infrastructure – the integration of digital infrastructure will be considered as a key feature of the development from the outset.
- 4.52 Green Infrastructure – the proposed development will maintain and enhance the site's green infrastructure (as illustrated on the Green Infrastructure Assets Plan), and protect and enhance the biodiversity of the site (in accordance with the recommendations of the Ecological Assessment).

Building Layout

- 4.53 The following aspects of the layout of individual buildings on site will be considered further at the detailed design stage:
- 4.54 Solar gain – buildings to be orientated to maximise opportunities for passive solar gain where possible.
- 4.55 Natural ventilation – buildings to be located to facilitate air movement and enhance natural ventilation where possible
- 4.56 Sustainable Materials – consideration to be given to using recycled or composite materials, as well as those that have been locally sourced and therefore reduce the carbon footprint of the development both during construction and over its lifetime.

Energy Efficiency

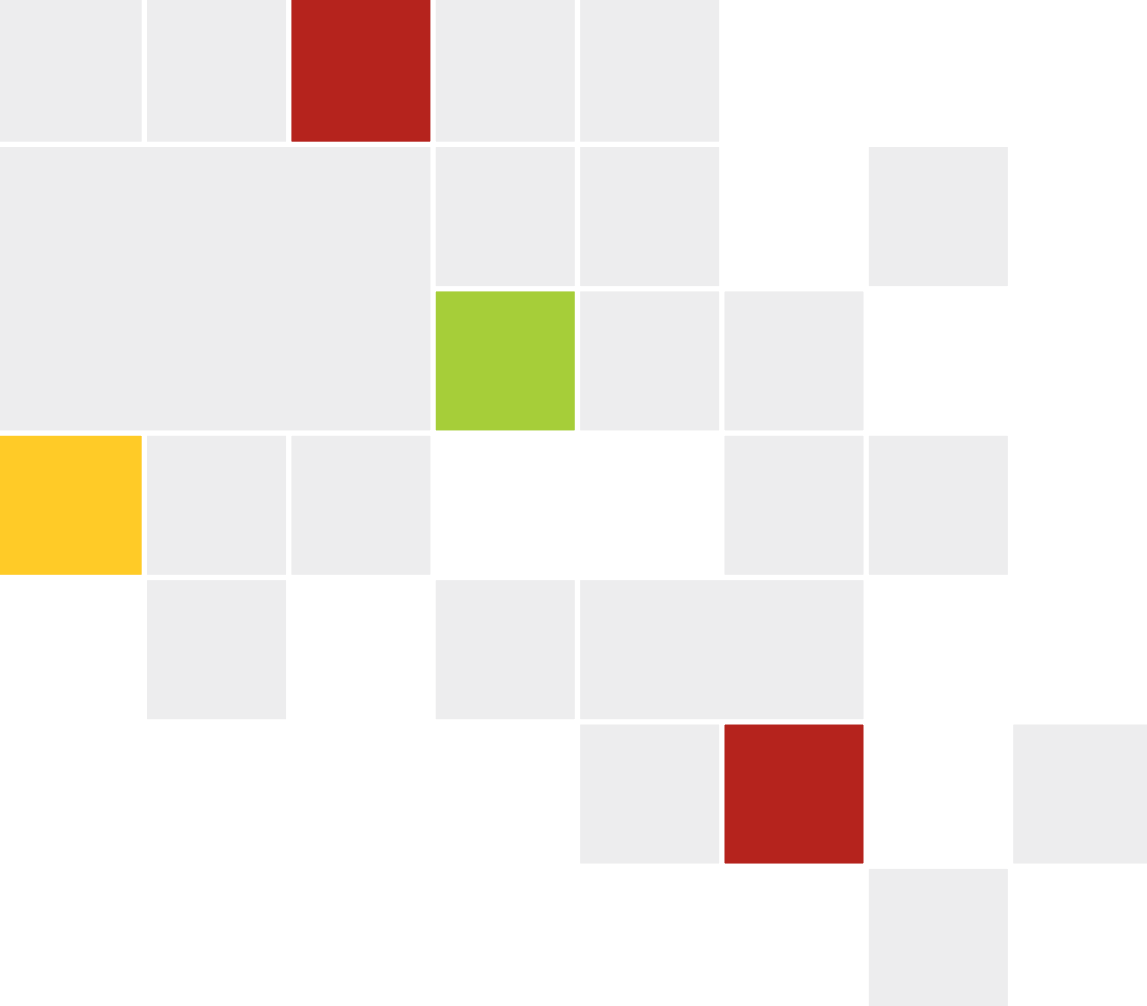
- 4.57 It is acknowledged that in line with Welsh Government's proposed Part L changes, new homes must produce at least 75% less CO₂ emissions compared to 2014 standards, with a view to achieving net zero carbon emissions as the grid decarbonises. The Candidate Site will be required to meet, as a minimum, the 2025 Part L standards.
- 4.58 In addition, a series of 'in-home' energy efficiency measures will be explored, potentially including the following:
- 4.59 The integration of smart meters and controls from the outset to allow for smart control of heating, water and appliances and allow householders to use energy efficiently and flexibly.
- 4.60 Use of highly efficient lighting, including daylight and motion detection systems to lighting to ensure they are only operated when required.
- 4.61 Measures to ensure water efficiency savings, such as dual flush WC, low flow shower and taps, low water-use dishwasher and washing machine, and water butts.
- 4.62 Adequate facilities for storage, separation and collection of waste and recycling should be included in schemes

Renewable Energy

- 4.63 It is acknowledged that the renewable and low carbon energy generation will play an important role in off-setting carbon emissions and achieving net zero homes. As such, options for on-site generation of renewable energy will be explored at the detailed design stage, including maximising solar panels on all buildings within the development.

5. CONCLUSIONS

- 5.1 This representation to the Phase 2 Candidate Site Assessment and Preferred Strategy consultation has been submitted by Boyer on behalf of Hallam Land Management Ltd, who control the 4.33ha site identified as Land West of Rockfield Road, Monmouth. HLM's interest is considered a logical and deliverable parcel that could be allocated as a suitable, deliverable and viable strategic allocation for residential development within the Monmouthshire's RLDP.
- 5.2 HLM are in support proposed preferred strategy being put forward by Monmouthshire County Council, although it has been highlighted that there is scope to pursue a higher level of growth, particularly high house prices and an unbalanced demographic.
- 5.3 This Report and associated technical reports have sought to demonstrate the Site's suitability for sustainably located residential development with good access to a range of local facilities.
- 5.4 In this context HLM and the consultant team have undertaken an extensive technical assessments of the site in order to provide clear evidence of the deliverability of the site.
- 5.5 HLM is wholly supportive of the allocation of the Land West of Rockfield Road, Monmouth as a suitable, deliverable and viable strategic allocation for residential development within Monmouthshire's LDP is committed to promoting and delivering their land interests for residential development and delivering homes to meet the County's needs.
- 5.6 To conclude, and as detailed in the above representation, it is evident that the site promoter, HLM, are clearly reliable developers who are readily available suitable and can deliver this site in a short timeframe. Given that the site has consent for 70 dwellings and a live planning application for 130 dwellings, the site is clearly deliverable and suitable to come forward.



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