

**MONMOUTHSHIRE LOCAL DEVELOPMENT  
PLAN (LDP)**

**REPORT OF CONSULTATION ON PROPOSED  
RURAL HOUSING ALLOCATIONS (INCLUDING  
CANDIDATE SITE ANALYSIS)**

**June 2011**

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## A. INTRODUCTION.

The LDP Proposed Rural Housing Allocations Consultation Draft assessed the capacity of Monmouthshire's Rural Secondary Settlements (Usk, Raglan and Penperlleni) and a proposed list of 26 „Main Villages“ to provide sites for housing development. In the Main Villages the primary aim was to identify land for small-scale housing schemes (up to a maximum of 15 dwellings) to meet local needs for affordable housing, although with some market housing to assist in bringing land forward and in financing the affordable housing. The original informal consultation generated significant interest from stakeholders and the public, with responses received from 876 organisations and individuals during the consultation period. These responses were considered and summarised in a Report of Consultation which set out the main issues raised.

As a result of this consultation exercise, some potential changes were identified that appeared to represent better options as preferred sites in five of the villages. These proposed changes were the subject of a further informal public consultation for a four week period from 7 January 2011 to 4 February 2011. The villages affected were:

Devauden  
Grosmont  
Llandogo

Llangybi  
Penallt

**183** organisations and individuals commented on the alternative village sites. These representations are summarised here together with the representations from the original consultation. The Council's reasons for selecting the allocated sites and response to the representations are given for each settlement.

### **General comments – Statutory Consultees**

#### **Proposed Rural Housing Allocations Consultation Draft**

Gwent Wildlife Trust (GWT) support the methodology behind the consultation draft and the criteria used for the selection of housing sites but would expect policies in the LDP to support further ecological surveys prior to development.

Countryside Council for Wales (CCW) welcomes work undertaken to inform rural housing allocations but have concerns regarding:

- Where housing needs surveys have been undertaken they are at Community Council area level, no information is included to identify individual villages.
- The number of houses proposed to be allocated within the AONB.

Home Builders Federation (HBF) object to the inclusion of affordable percentages on the grounds that they, together with other planning

obligations, will have a significant effect on viability and flexibility. Appropriate work on viability needed to ensure targets are deliverable.

Wye Valley AONB unit (WVAONB) are generally satisfied with the approach adopted to establish a hierarchy of villages. The preferred approach would direct development, wherever possible to brownfield sites within existing village development boundaries.

CPRW commented that whilst the report is comprehensive and informative it does not take account of the facilities within the Brecon Beacons National Park area.

### **Further Informal Consultation on alternative village sites**

Gwent Wildlife Trust (GWT) support the methodology behind the additional site consultation and the exclusion of some sites on sustainability and biodiversity grounds, and the criteria used for the selection of housing sites. Would expect policies in the LDP to support further ecological surveys of sites prior to development.

The Environment Agency commented that when reviewing facilities within a village it should be considered whether the settlement is served by the public foul sewer and if there is sufficient capacity to accommodate additional development. In addition it should be considered whether sites in flood risk areas can be justified for inclusion in the LDP, especially where there is no or insufficient evidence to demonstrate that the risk and consequences of flooding can be managed in line with TAN15.

### **General comments – Organisations**

#### **Proposed Rural Housing Allocations Consultation Draft**

Pontypool Park Estate Office commented that any “social” housing must remain properly accessible, avoid any windfall gains to occupiers and be properly maintained. There must also be proper design criteria.

The Friends, Families and Travellers and Traveller Law Reform Project commented that the needs of Gypsies and Travellers should be identified and considered in any allocations document. If there is need within rural areas then appropriate allocations should be made. The needs of Gypsies and Travellers should have been identified and considered in the report.

Sustrans Cymru commented that whilst they had no specific comments to make about specific sites, new development should be made to reduce car journeys where ever possible and particularly in urban areas follow the two principles of „convenience” and „filtered permeability”, to enable more people to choose sustainable transport choices.

### **Further Informal Consultation on alternative village sites**

- No evidence given to support the assumption that small scale housing developments will contribute to building sustainable rural communities.
- Retention of services can be delivered through an exceptions policy.

### **General comments – Individuals**

#### **Proposed Rural Housing Allocations Consultation Draft**

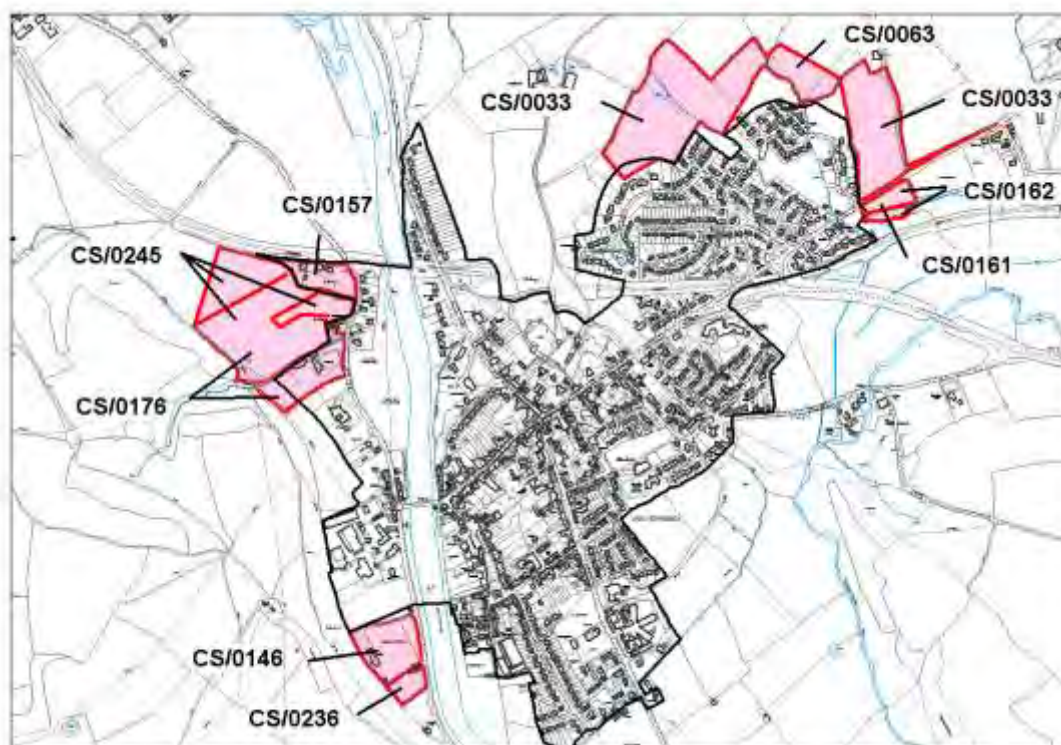
- The overall housing figure is too low, a greater level of development should be diverted to the „Main Villages“, in particular the larger villages.
- Concerns regarding the affordable housing target, too high a target has implications with regard to deliverability. Targets are not founded on a robust and credible evidence base.
- Guarantees needed to ensure that it is local need being met.
- Need to define what is meant by „affordable housing“.
- Welsh Water’s Business Plan should correlate with the Local Development Plan to prevent a back log of much needed rural development.

### **Further Informal Consultation on alternative village sites**

- A clear published definition of affordable housing is needed.
- Inconsistence assessment of need.
- Mistakes and inaccuracies in the initial assessment of sites have not been amended following the Proposed Rural Housing Allocations consultation.

## B. Rural Secondary Settlements.

### 1. USK



**14** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Usk are summarised as follows:

GWT commented that the southern part of CS/0162 is identified as a UKBAP Priority Habitat and S42 habitat. Would expect retention and protection of hedgerows and ditch and protected and priority species to be taken into account in the development process.

Glamorgan Gwent Archaeological Trust (GGAT) commented that CS/0162 has no known archaeological restraints. No reason for not allocating.

CCW commented that CS/0162 could contribute to ribbon development, contrary to PPW para 9.3.1, and Test of Soundness C2.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that in relation to CS/0162 further development would be detrimental and read as ribbon development.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to CS/0162 further ecological assessment will be

necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council commented that development of CS/0146 and CS/0236 would be detrimental to the views of the Usk Bridge, the semi rural character is enhanced by these open fields.

Usk Civic Society submitted the following comments:

- CS/0033, CS/0063 and CS/0161 taken together would represent a significant Greenfield expansion to the settlement.
- CS/0162 should not be allocated as the site has poor access and suffers from flooding and drainage issues. Part of the site is already used for allotments.

The agent acting on behalf of the landowner of CS/0174, CS/0175 and CS/0176 (Coleg Gwent) commented that the proposed allocation of 20 dwellings over the plan period is too low as the settlement is capable of accommodating a larger number.

The agent acting on behalf of the landowner of CS/0033 submitted the following comments:

- Good range of facilities and infrastructure.
- Settlement capable of accommodating more than 20 dwellings over the plan period.
- Good access achievable.
- Any ecological impacts can be mitigated/compensated for in the development.
- Development would not impinge on the setting of the town

Studies relating to traffic impact, landscape and biodiversity submitted in support of the site CS/0033:

The Phase 1 Habitat Survey identifies habitats present within the site and assesses the ecological status and value of these habitats.

The landscape and visual appraisal concludes that carefully designed development on the site would not impinge upon the setting of the town when viewed from the surrounding landscape and townscape. It also concludes that the findings of the site survey undertaken suggest that by controlling the maximum contour level of development would avoid encroachment onto the part of the hillside visible from the Usk valley and could also be kept below the skyline when viewed from the road. The appraisal also suggests retention and enhancement of existing hedgerows and trees within the site to ensure landscape an visual impact is minimised.

The Transportation Assessment proposes a new access by adapting and improving the existing Little Castle Farm access on Monmouth Road. The TA concludes that the proposed residential development would not have a significant impact on the surrounding road network



The agent acting on behalf of the landowner of CS/0162 wrote in support of its allocation.

4 individuals submitted comments as follows:

General comments:

- Usk has already experienced substantial expansion to the north-east.
- Further development too far from the centre of the settlement.

2 representations received in relation to CS/0162:

- Would represent ribbon development.
- Greenfield development.
- Increase in traffic.
- Issues of flooding and surface water drainage.
- Impact on biodiversity.
- Amenity of neighbouring properties.
- Light and noise pollution.

Representations relating to the Candidate Site Assessment „Traffic-Light“ Matrices are considered further in **Appendix 1**.

Although not part of the **Alternative Village Sites Consultation** the following comments were received on Usk in response to this consultation:

CS/033 Land north/northeast Castle Oaks, CS/0063 Little Castle Farm, CS/0161 & CS/0162 Sites off Cwrt Burrium

The Environment Agency commented that the Council's Land Drainage Department should be consulted on sites with a watercourse running through them. An undeveloped buffer zone should be maintained alongside watercourses to protect biodiversity.

## **Candidate Site Analysis**

### CS/0033 and CS/0063 (Residential)

These sites should be taken into consideration together due to their location; CS/0063 is situated between the two parcels of land related to CS/0033. There would be difficulty in obtaining sufficient vehicular access to these sites. There are also biodiversity concerns as there are European species issues to be considered at the site, the western portion of CS/0033 has also recently been designated as a SINC. In terms of landscape the Landscape Sensitivity and Capacity Study identifies the sites as being within an area of high/medium sensitivity and low capacity for residential development.

The development of these sites would represent a significant greenfield expansion that would have adverse landscape impacts, particularly as significant development has been recently built in close proximity. It is not

considered appropriate to allocate a large site in the Usk area in the LDP due to recent development in the area.

#### CS/0161 and CS/0162 (Residential)

These sites are located within the same area; both have been put forward for a residential use although CS/0162 relates to a larger site area of 0.66ha rather than 0.46ha (CS/0161). A sufficient vehicular access can be obtained to the site. It is also located in close proximity to the public transport network with a regular bus service and is in walking distance of the shops and facilities within the town centre. The site is located within a character area identified within the Landscape Sensitivity and Capacity study as being of high/medium sensitivity and low capacity, development would therefore have to be carefully implemented into the surroundings to ensure it does not have a detrimental impact. Care would need to be taken over some biodiversity issues but this is not considered to rule out development of the site.

It is considered that this site would have less landscape impact in its own right being small scale and low lying, it provides the most appropriate opportunity for a small development in Usk..

#### CS/0236 (Residential)

This site is located within the Llanbadoc ward in a prominent position on the edge of Usk adjacent the road leading to Caerleon. There would be difficulty accessing this site if it were developed on its own. The whole of the site is located within Zone C1 floodplain and therefore it would be unsuitable for a residential use.

#### CS0146 (Employment or Residential)

This site is located within the Llanbadoc ward in a prominent position on the edge of Usk adjacent the road leading to Caerleon. The site relates to the Usk Rugby Football Club and is therefore designated as Amenity Open Space; the redevelopment of this site would not be countenanced unless alternative accommodation for the rugby club was provided. The whole of the site is located within Zone C1 floodplain and would therefore be unsuitable for a residential use. A sufficient amount of land is also available for employment use in the Usk area and therefore this site is currently not required.

#### CS/0157 (Leisure/Tourism)

This is a site currently designated for an employment use in the UDP and is being taken forward as a protected employment site in the LDP. The proposed use for leisure/tourism would therefore not be considered appropriate in this location.

#### CS/0176 (Employment/Business or in event of successful flood defence Residential)

This site is located adjacent the A472 in the Llanbadoc ward on the entrance to Usk from Little Mill. The site relates to a greenfield site adjacent a current employment allocation that has not yet been taken up. The whole of the site is located within Zone C1 floodplain and would therefore be unsuitable for a residential use. A sufficient amount of land is currently available for employment use in the Usk area and therefore this site is currently not required.

The major reason this site is rejected for residential purposes is due to its location in the floodplain, however, there are also landscape impact issues.

#### CS/0245 (Employment)

This site is located adjacent the A472 in the Llanbadoc ward in a prominent position on the entrance to Usk from Little Mill. The majority of this site is greenfield other than the existing dwelling and garden within the site boundary. The site is close to a current employment allocation that has not yet been taken up. The whole of the site is located within Zone C1 floodplain. A sufficient amount of land is currently available for employment use in the Usk area and therefore this site is currently not required.

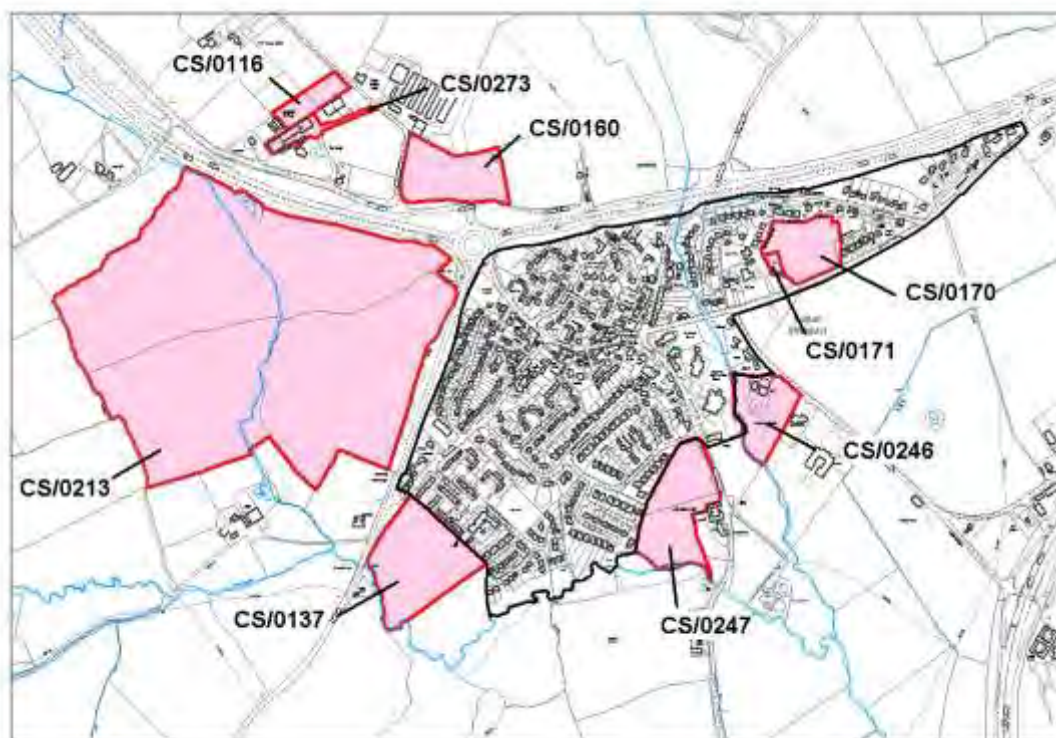
#### **Council's Response:**

Given the difficulties of extending Usk without compromising landscape and flooding interests, the settlement is only considered suitable for small scale residential development and site CS/0162 is considered to be appropriate for development as it would have less landscape impact in its own right, being small scale and low lying, it provides the most appropriate opportunity for a small development in Usk.

#### **Conclusion:**

Candidate Site CS/0162, Cwrt Burrium, Usk is allocated for 20 dwellings in the Deposit LDP

## 2. RAGLAN



**23** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Raglan are summarised as follows:

GWT has no objection to CS/0246 and CS/0247 but would expect retention of mature trees and hedgerows and adjacent watercourses and protection of priority species in the development process.

GGAT commented that CS/0246 and CS/0247 have no known archaeological restraints. No reason for not allocating.

CCW commented that any development of CS/0246 and CS/0247 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to CS/0246 and CS/0247 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the sites acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to CS/0170 and CS/171, the open nature of the site allows views across to the castle.

Raglan Community Council accepts the figure of 40 houses as the target for the next ten years but would wish to see as many as possible built as affordable housing for local people. They made the following site specific comments:

CS/0137

- Good access.
- Adjacent existing development.
- Within walking distance of village centre and school.

CS/0246

- Land partly in flood plain.
- Land would be more suitable for the provision of parking.

CS/0247

- Land partly in flood plain.
- Should be earmarked for a school, village hall and car parking.

The agent acting on behalf of the landowner of CS/0170 submitted the following comments:

- Within the existing VDB and is well related to the existing built up area.
- No known ecological or archaeological constraints.

16 individuals submitted comments as follows:

4 individuals submitted comments in support of CS/0137:

- Most favourable site against the assessment criteria.
- Less impact on amenity of neighbouring houses.

1 individual submitted comments in support of CS/0170:

- Already surrounded by housing and has the necessary infrastructure.

2 individuals submitted comments in support of CS/0171:

- Within existing village boundary, represents infill rather than extension.
- Better drainage and no flood risk.
- Good access.

2 individuals submitted comments in support of CS/0246:

- Safe access.
- Minimal effect on nearby residents.
- Minimal effect on landscape setting.

General comments:

- Capacity of the village to absorb the level of development.
- Increase in traffic congestion.
- Sewerage capacity.
- New school needed before any new development.
- Increase in incidence of crime with affordable housing.

9 representations received in relation to CS/0246:

- Greenfield site.
- Poor access.
- Issues of flooding.
- Impact on biodiversity.
- Noise and light pollution.
- Adjacent an area of Special Archaeological Sensitivity.

14 representations received in relation to CS/0247:

- Greenfield site.
- Poor access.
- Issues of flooding and surface water drainage, part of the flood plain of the Wilcae Brook.
- Impact on biodiversity, UKBAP and LBAP habitats present on the site.
- Noise and light pollution.
- Impact on landscape and entrance to the village.
- Adjacent an area of Special Archaeological Sensitivity.
- Impact on amenity of neighbouring houses.

Representations relating to the Candidate Site Assessment „Traffic-Light“ Matrices are considered further in **Appendix 1**.

Although not part of the **Alternative Village Sites Consultation** the following comments were received on Raglan in response to this consultation:

#### CS/0170 Land to the east of Hill House

The agent acting on behalf of the promoters of CS/0170 commented in support of the site that it is well contained with defensible boundaries and is already surrounded by housing. As such any views across the site would be seen against the backdrop of existing built development.

#### CS/0246 Land at Brooks Holdings & CS/0247 Land at Chepstow Road, Raglan

The Environment Agency commented in relation to CS/0246 and CS/0247 that the sites are either entirely or partially within DAM zone C2. The Council should consider whether sites in flood risk areas can be justified for inclusion in the LDP, especially where there is no or insufficient evidence to demonstrate that the risk and consequences of flooding can be managed in line with TAN15.

### **Candidate Site Analysis**

#### CS/0137 (Residential)

The Landscape Sensitivity and Capacity study identifies that this site is located within an area of high/medium sensitivity and medium/low capacity for housing, the most sensitive part of the site being adjacent the Nant Y Wilcae

brook. Part of the site is located within Zone C2 floodplain and therefore would be unsuitable for a residential use. Although the site is reasonably related to the village it would result in a considerable expansion into open countryside on a sensitive approach to Raglan from the south. CS/0247 provides a better rounding off opportunity, with better links to the village centre and would have less impact on the surrounding landscape.

#### CS/0170 (Residential)

This site is located within a significant area of amenity open space of which there are few within the village Raglan. The site is located and also has importance in the Raglan Conservation Area and also in views of and from the Castle. It is considered that CS/0247 be a more appropriate site for development in both landscape and conservation terms.

#### CS/0213 (Regional agricultural/business park/hotel/parkland/public open space/hospice/retirement village/residential)

This is a site of significant scale (26.5ha) and would almost double the village of Raglan in size. The site is proposed for a mixed use development including residential uses. The Landscape Sensitivity and Capacity study identifies that this site is located within an area of high/medium sensitivity and medium/low capacity for housing. Development of this site would be highly visible from the adjacent roads; A40 and Usk Road and also potentially in views from Raglan Castle a Scheduled Ancient Monument. This is considered to be a significant greenfield expansion, with adverse landscape impact which would be totally out of scale with the village.

#### CS/0246 (Residential)

The Landscape Sensitivity and Capacity study identifies this site as being of medium sensitivity and medium capacity for residential. However, a significant proportion of this site is located within Zone C2 floodplain and would therefore be unsuitable for a residential use. The remainder of the site would be of better use as a community use due to its close link to the adjacent school and doctors surgery.

#### CS/0247 (Residential)

This site is identified within the Landscape Sensitivity and Capacity Study as being in a character area of high/medium sensitivity and medium/low capacity for housing, the most sensitive part of which is adjacent the Nant Y Wilcae brook. A small portion of the original site is located within Zone C2 floodplain, however the boundary has been redrawn to take the site out of the floodplain and also further away from the most sensitive area in landscape terms which will enable existing trees within the site as to be utilised as screening along the boundary of development. The site is well linked to the village core and is in very close proximity to the village school, church, hall and doctors surgery. This site is considered to be best related to the form of the existing village and

will provide a satisfactory rounding off whilst also accommodating the required housing need to support the village.

#### CS/0171 (Residential)

This site already has the benefit of planning permission, it is a particularly small site and it is therefore not considered appropriate to be included within the allocations of the LDP.

#### CS/0116 (Employment/Agriculture Based)

It is not considered appropriate to provide this as an allocation within the LDP. The proposal could be considered against development management policies.

#### CS/0160 (Visitor Accommodation)

It is not considered appropriate to provide this as an allocation within the LDP. The site is located within a landscape character area that has a high/medium sensitivity as it contains the listed Raglan Castle in its Conservation Area which overlooks the area to the west. The area acts as a setting, especially to the east. It also is open countryside separated from the settlement of Raglan by the A40[T] and a strong tree belt.

#### CS/0273 (Retail)

This proposal could be considered under current UDP policies and is not a matter for the LDP. The site, in any event, is located outside the Central Shopping Area of Raglan and therefore would not be suitable for a general retail use.

#### **Council's Response:**

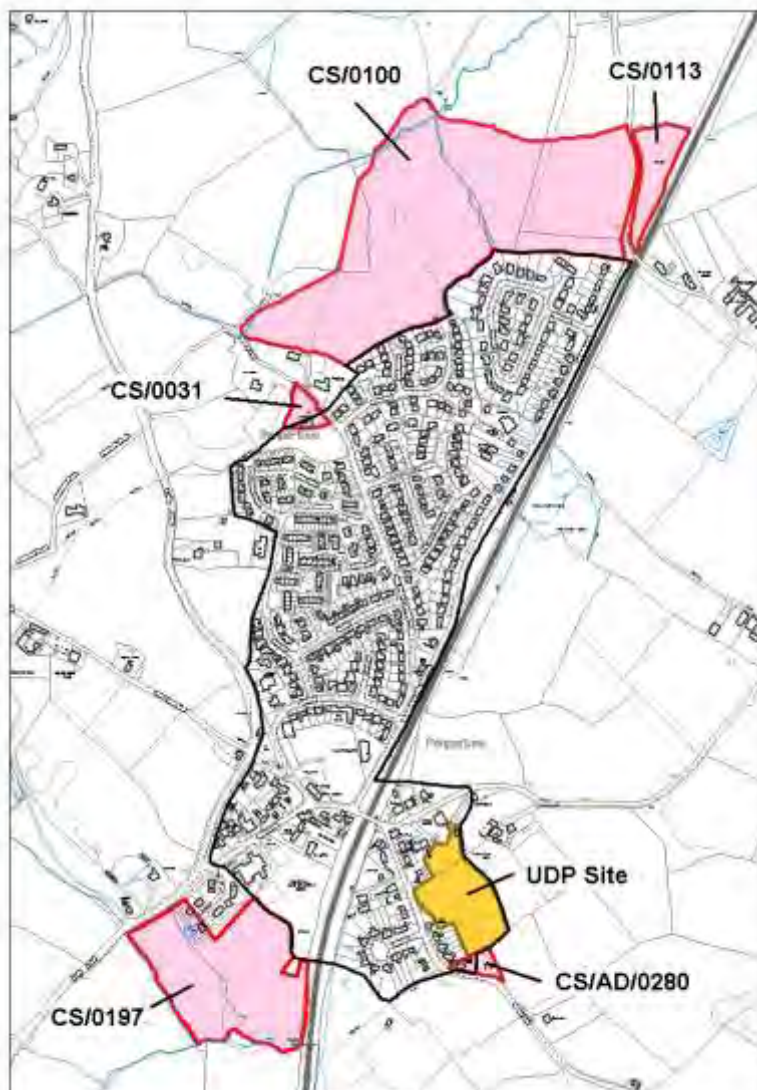
Raglan is a relatively sustainable settlement with a high level of local housing need. It is considered suitable, therefore, for a development of an appropriate scale. In this respect, Candidate Site CS/0247 is considered to offer the best option, for the reasons set out above.

#### **Conclusion:**

Candidate Site CS/0247, Chepstow Road, Raglan is allocated in the Deposit LDP for 45 dwellings on 1.5 ha.



### 3. PENPERLLEN/GOETRE



**9** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Penperlleni/Goetre are summarised as follows:

GWT has no objection to CS/0197 but would expect retention and protection of the pond, mature trees, hedgerows and wet woodland and protection of priority species to be taken into account in the development process.

GGAT commented that there is no reason for not allocating CS/0197:

CCW made the following comments:

- Hard to justify the allocation of CS/0197 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6

(para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)

- Any development of CS/0197 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that in relation to CS/0197 any development would encroach on its rural open character with a detrimental landscape and visual impact.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to CS/0197 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Goetre Fawr Community Council commented that problems of sewerage capacity should be addressed before further development takes place. The preferred site has poor access.

The agent representing the landowners of CS/0031 submitted the following comments:

- The current development boundary cuts through the curtilage of the property.
- If included in the VDB would offer a future “windfall” site.

A letter has been received from developers interested in CS/0197 expressing their support for the site and suggesting that it would be appropriate for 50 dwellings.

1 individual queried the likelihood of affordable housing being built on CS/0100 and CS/0113.

Representations relating to the Candidate Site Assessment „Traffic-Light” Matrices are considered further in **Appendix 1**.

Although not part of the **Alternative Village Sites Consultation** the following comments were received on Penperlleni in response to this consultation

#### CS/0100 Capel Ed Lane & CS/0197 Land to the south of Penperlleni

The Environment Agency commented that as watercourses run through the sites the Council’s Land Drainage Department should be consulted.

### **Candidate Site Analysis**

#### CS/0100 (Residential)

The site is located within an area identified in the Landscape Sensitivity and Capacity study as being of high/medium sensitivity and medium/low capacity.

There would be difficulty in obtaining vehicular access to the site and it is not linked as well as other sites to the core of the village. There are significant biodiversity concerns at this site; the whole site has recently been designated as a SINCC. This site is considered to represent a significant greenfield expansion into open countryside to the north of the village with a resulting adverse landscape and biodiversity impact, development would be out of scale with the existing village.

#### CS/0197 (Residential)

This site is adjacent the recently constructed affordable housing site. Access can be obtained through this recent development to support the site. The Landscape Sensitivity and Capacity study identifies the site as being located within an area of high/medium sensitivity and low capacity. The site has good pedestrian access to the adjacent school and facilities within the village core. There would be concerns in relation to highways if the whole site were to be put forward for development.

Development of the whole site originally put forward would not be appropriate in either landscape or access terms and the boundary of the site has therefore been subsequently reduced. The development would provide a rounding off opportunity to the south of the settlement to support the required housing needs of the village and would be satisfactorily screened by the adjacent recent housing development, school and railway line.

The Welsh Government has expressed concerns about the impact of development of this site on the trunk road and this matter is being investigated further.

#### CS/0031 (Residential)

The extension to the Village Development Boundary proposed for this site is not considered to be necessary or appropriate for inclusion within the LDP. It would have implications for the way the boundary relates to other dwellings in this locality and could lead to the loss of the openness of this settlement edge.

#### CS/0113 (Residential)

The site is located within an area identified in the Landscape Sensitivity and Capacity study as being of high/medium sensitivity and low capacity. There would be difficulty in obtaining vehicular access to the site and it is somewhat isolated from the rest of the village. This site would represent an inappropriate greenfield expansion into open countryside to the north of the village with a resulting adverse landscape, development in this area would be out of character with the existing village.

#### CS/AD/0280

The extension to the Village Development Boundary proposed at this site is not considered to be necessary or appropriate for inclusion within the LDP.

**Council's Response:**

Penperlleni is a relatively sustainable settlement with a high level of local housing need. It is considered suitable, therefore, for a development of an appropriate scale. In this respect, Candidate Site CS/0247 is considered to offer the best option, for the reasons set out above.

With regard to Goetre Fawr Community Council's comments, Dwr Cymru Welsh Water has not raised any issues in relation to sewerage capacity in the area.

**Conclusion:**

CS/0197 Land to the south of School Lane, 1.34 hectares of the site is allocated in the Deposit LDP for 40 dwellings on 1.34ha..

## 4. LLANFOIST

While Llanfoist has an easily recognisable „village“ identity it also has a very close physical and functional relationship with the adjoining larger main settlement of Abergavenny. It was considered appropriate in preparing the LDP Preferred Strategy, therefore, to group Llanfoist with Abergavenny.

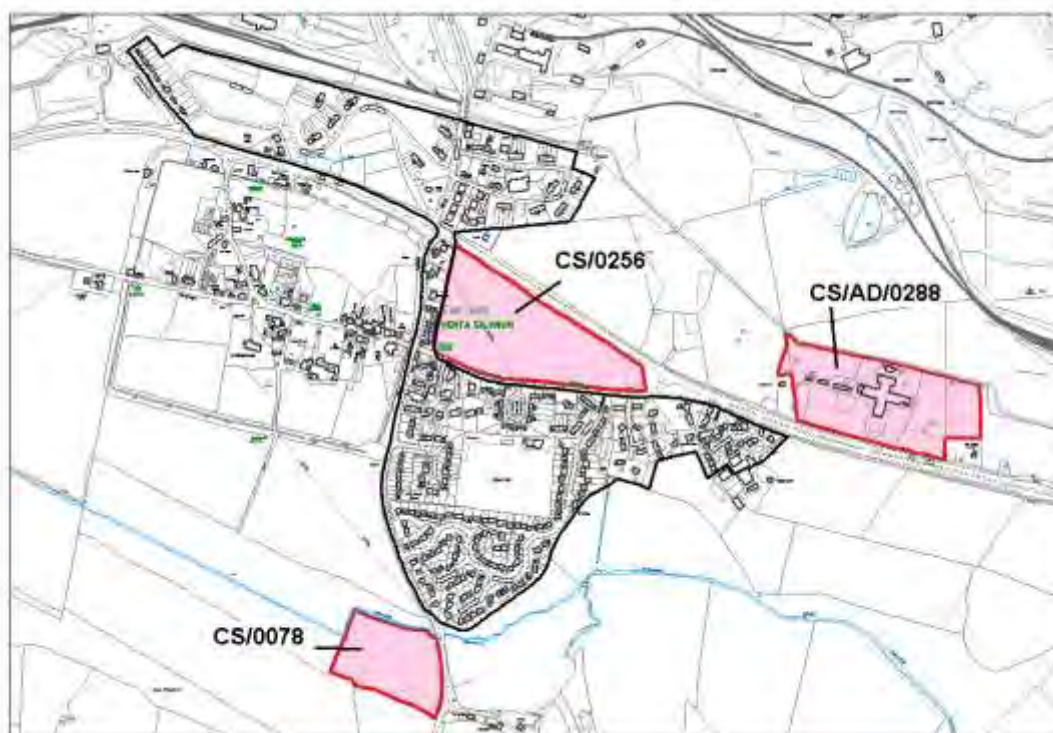
In response to the Preferred Strategy consultation, however, views were expressed by the public and by Members that Llanfoist should be recognised as a settlement in its own right and not included with its larger neighbour.

Llanfoist is identified as a „Rural Secondary Settlement“ in the Deposit LDP, therefore, although as candidate sites have been put forward for residential development in the viilage to meet the needs of Abergavenny town these sites are analysed in the Abergavenny Settlement Background Paper.

Given the high levels of development that Llanfoist has experienced in the last few years, together with concerns about highway capacity in the village, no housing allocations are made for Llanfoist in the Deposit LDP.

## C. Representations by Main Village.

### 1. CAERWENT



**5** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Caerwent are summarised as follows:

The Conservation Manager for Monmouthshire County Council objected to CS/0256 as the site is important to the sense of openness which prevails through the Conservation Area.

#### 4 individuals submitted comments as follows:

General comments:

- Insufficient infrastructure to support increased volumes of traffic.
- Importance of Caerwent as an archaeological site.
- Worsening of flooding issues around the Caerwent Brook.

1 representation in support of the Council's decision to not allocate further land for development in the village.

3 representations received in relation to CS/0256:

- Most suitable site for development as would extend the village up to the physical settlement boundary of the A48.
- Problem of safe access to the site.
- Archaeological importance of the field.



2 representations received in relation to CS/0078.

- Worsening of flooding issues around the Caerwent Brook.
- Well-used agricultural land.

### Candidate Site Analysis

#### CS/0078 (residential)

Approximately half of the site is located within Zone C2 floodplain and therefore would be unsuitable for the proposed use. There are also biodiversity, landscape and archaeological concerns with relation to this site.

#### CS/0256 (residential)

There are landscape and archaeological concerns with relation to this site.

#### CS/AD/0288 (residential)

There are archaeological concerns and strong highway concerns with relation to this site. The site may also be affected by a potential minerals safeguarding area.

### Categorisation of Caerwent

Given that there is an existing planning permission in Caerwent, at Merton Green, for 132 dwellings it was concluded that there was no need to identify any additional land in the village for housing development, although even if this was not the case it was further considered that none of the submitted candidate sites would have been suitable for development, as summarised above. The rural housing allocations policy that seeks to allocate up to 15 dwellings in Main Villages with a 60% requirement for affordable housing was, therefore, not applicable to Caerwent, and the categorisation as a Main Village was not relevant. At the same time, the size of the settlement, its range of services and facilities and its close functional relationship with 'Severnside', particularly Caldicot, was considered to make its identification as part of Severnside more appropriate. This was reinforced by the Affordable Housing Viability Study, which identified that land values in Caerwent were similar to other settlements in Severnside, warranting grouping them together for the purposes of developing affordable housing policy. Caerwent, therefore, is categorised as a 'Severnside' settlement for the purposes of the spatial strategy of the LDP. It is not proposed for any further housing development and its significance for heritage and archaeology and as a conservation area village is recognised in other policies of the plan.

#### **Conclusion:**

Given the settlement's location in the 'Severnside' region and its size and the range of services and facilities available the existing VDB is confirmed in the Deposit LDP but no housing allocations are made in the Plan.

## 2. CROSS ASH



**6** Representatives submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Cross Ash are summarised as follows:

GWT made the following comments:

- No objection to PV28 and PV32 but would expect retention of trees and hedgerows, with protected and priority species to be taken into account in the development process.
- Object to PV29 as a large proportion of the site qualifies as UKBAP Priority Habitat and S42 habitat.
- Appears to be no ecological assessment of PV36, would expect an assessment to identify the brook and mature trees as important biodiversity features to be protected in the development process.

GGAT made the following comments:



- No objection to the allocation of PV28 and PV29 but archaeological features could restrict development.
- PV32 and PV36 have no known archaeological restraints.

CCW made the following comments:

- If PV29 and PV36 are developed then the loss of biodiversity habitat should be minimised.
- PV28, PV29 and PV32 could contribute to ribbon development, contrary to PPW para 9.3.1, and Test of Soundness C2.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV28, PV29, PV32 and PV36 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the sites acknowledged and considered.

Llangattock Vibon Avel Community Council commented that allocation of PV36 for 3-bed houses would be preferable with the other sites kept in reserve.

The owners of sites PV28/29 and PV32 have confirmed that they are interested in their land being put forward for development.

1 individual submitted comments as follows:

- Is a rural hamlet not a 'Main Village',
- Increased environmental impacts,
- Capacity of settlement to accommodate proposed scale of development.

Dwr Cymru Welsh Water has confirmed that sewerage and water facilities in the village are acceptable.

## **Candidate Site Analysis**

### PV28

This site was formally used in connection with agriculture but is currently unused and is somewhat a detractor in landscape terms within the local area; the treed boundaries do however provide screening and would be valuable in minimising any impact development would have on the surrounding landscape.

### PV29

This site was formally used in connection with agriculture, two former poultry sheds are located on the site and are currently unused; the treed boundaries to the site provide screening and would be valuable in minimising any impact development would have on the surrounding landscape. The site would have to be accessed through PV28 and could only be developed in combination with this site.

### PV32

This site could be accessed either by modifying the existing access to the garage site or by providing a new access. The garage site is currently unused; the development could provide an opportunity to regenerate this part of the village.

### PV36

Out of the four sites identified within the area this site is the most open and prominent in the landscape due to its location in the fields opposite the village school. It is considered the other sites considered present the most appropriate locations for development in this area.

### **Council's Response:**

Whilst the village is marginal in terms of its 'sustainability', having a small population size, limited facilities and poor access to public transport, local need for affordable housing is high and there is an existing school in the village which serves a wide area and is worthy of support as well as having sustainability benefits for existing residents. Care would need to be taken over some biodiversity issues with sites PV28 and PV29 but this is not considered to rule out development of the site.

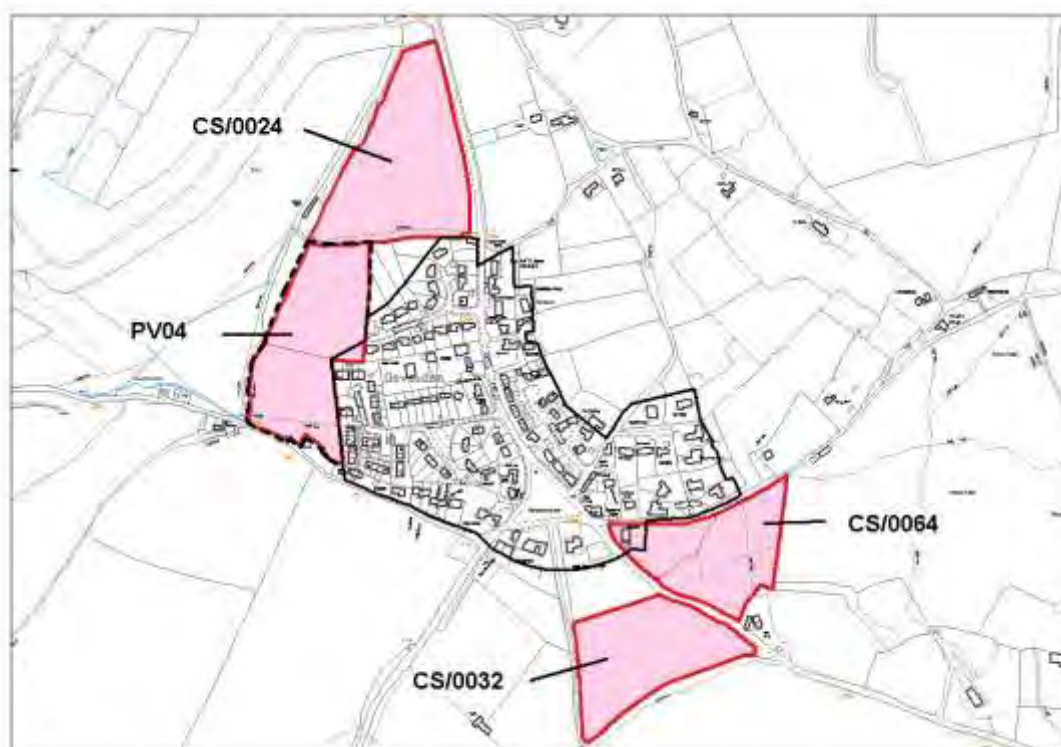
### **Conclusion:**

Cross Ash is designated as a Main Village under Policy S1 of the Deposit LDP.

PV28 and PV29 Land adjacent to village hall are allocated in the Deposit Plan for a maximum of 10 dwellings, and PV32 Land adjacent Cross Ash Garage is allocated in the Deposit LDP for a maximum of 5 dwellings.

A VDB is drawn around the existing development with extensions to incorporate the above housing allocations.

### 3. DEVAUDEN



**63** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Devauden are summarised as follows:

GWT has no objection to PV04 but would expect retention and protection of trees and hedgerows and ecological connectivity during development.

GGAT commented that PV04 has no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Any development of PV04 should make provision for the protection of existing landscape and ecological features and minimise potential impacts on biodiversity.
- Concerned about the number of houses proposed, as no specific housing need study undertaken. Size of site seems excessive for 15 houses, not the most efficient use of land, thus contrary to PPW (paras. 4.10.5, 9.1.2.)

WVAONB commented that long distance views into PV04 would be limited, a high quality and structural landscaping scheme would need to be incorporated into any design for the site.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities in the village as being acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that there may be some capacity to the north west but mitigation measures should be taken in advance of development.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV04 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

2 agents acting on behalf of the promoters of sites submitted comments:

Comments in support of CS/0064:

- The site scores higher against a number of criteria in the Council's assessment than the preferred site, in addition access can be achieved directly off the highway network.
- A planning statement was submitted by Asbri Planning on behalf of the proposer of the site at the time of the original candidate site submission and includes a description of the site/surroundings, relevant current planning policy and an appraisal of development. The statement also includes a site plan that splits the site into two areas; Area 1 is 0.52ha and Area 2 is 1.29ha.

Comments in support of CS/0024:

- The site can be adequately accessed whilst the preferred site may require third party land to achieve access.
- Additional studies undertaken indicate that the site has similar landscape characteristics to PV04 and is of low biodiversity value, not medium as in the Council's assessment.
- Whilst in proximity to listed buildings their settings would be largely unaffected by any development.

Studies have been submitted in support of site CS/0024 relating to traffic impact, landscape and biodiversity:

The Phase 1 Habitat Survey identifies habitats present within the site and assesses the ecological status and value of these habitats.

The landscape and visual appraisal concludes that effects of the development on the five stated special qualities of the AONB landscape character are limited and suggest only three of which apply to the Candidate Site as there is no established woodland within the site and no panoramic views from it to the Usk Valley. It is suggested that the agricultural nature of the site would be lost but hedgerows will be retained and enhanced with further hedgerows. It is noted that the proposed development would consolidate the existing village.

The Transportation Assessment proposes a new access onto the B4293. In order to achieve the recommended visibility splay requirements the 30mph speed limit would require relocation resulting in the requirement of a Traffic Regulation Order. The TA concludes that the proposed residential

development would not have a significant impact on the immediate road network.

1 individual has suggested an alternative site in Well Lane. Points put forward in support include:

- Former set aside area.
- Good access.
- Site is outside the AONB.
- Site can feed into sewerage plant without pumping.

A letter has been received from the owner of site PV04, suggesting that access is obtained from Churchfields, the land between the public highway and the site being in his ownership. The proposer of the site also submitted two plans in October 2010. The first plan shows locations of hedgerows on the site, location of the existing sewer, location of a public footpath crossing the southern part of the site and also shows how development can be accessed through Churchfields- including identification of a 'ransom strip' referred to in the Highways assessment as being within the ownership of the proposer. The second plan provides a draft layout of the site including identification of both affordable and market housing.

54 individuals submitted comments, with 26 submitting a standard letter:

General comments:

- Village is within the AONB and views need to be protected.
- Village has already experienced significant growth, additional development would have a detrimental affect on the nature of the village and local environment.
- Need not established based on accurate and up to date evidence.
- Lack of local facilities and services.
- Anomalies in services and facilities identified in the Function and Hierarchy of Settlements Report.
- Increase in noise and pollution.
- No mains gas.
- Problems of continuity of electricity supply and broadband speed.
- Development would take up good agricultural land.
- Problems of surface water drainage and sewerage capacity.
- Affordable housing welcome, but no need for further market housing.

10 representations received in relation to CS/0024:

- Development would extend the village beyond the current natural boundary and impact on the AONB.
- Visual impact on the character of the village.
- High biodiversity value, recommended for SINC status, with presence of protected species.
- Poor road access and no footpath access to the village.
- Public footpath runs through the site.
- Current amenity value of the land.

- 1 representation commented that this is the most suitable site for development.

4 representations received in relation to CS/0032:

- Visual impact on the character of the village.
- Environmental impact.
- Poor access.
- 1 representation commented that this is the most suitable site for development.

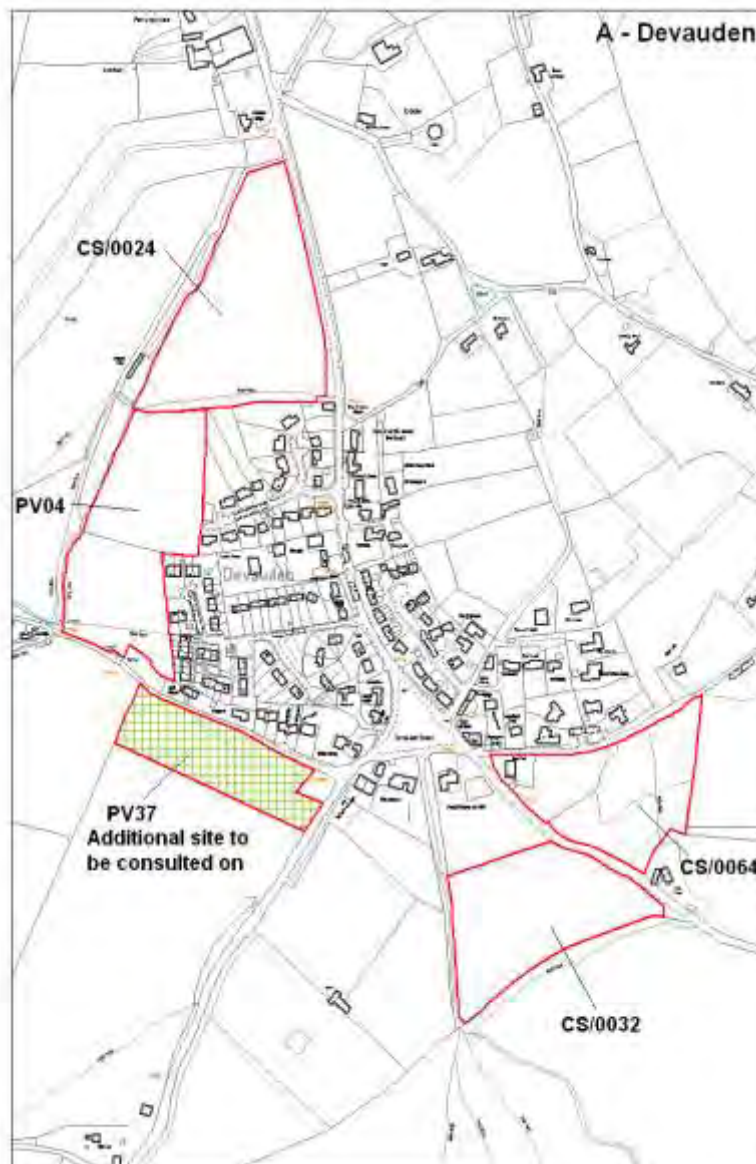
3 representations received in relation to CS/0064:

- Access problems with poor visibility.
- Possible SINC quality.
- Environmental impact.
- Biodiversity value of the site.
- To connect to main sewer increased pumping would be needed.

48 representations received in relation to PV04:

- Outside the village development boundary.
- Biodiversity and connectivity value of the site. Should be the same as CS/0024 due to their proximity.
- Environmental and visual impact.
- To connect to main sewer increased pumping would be needed.
- Poor access.
- Proximity of play area, increased danger for children.
- Devaluation of nearby properties.
- Current amenity value of the land, footpaths cross the site.
- 1 representation commented that this is the most suitable site for development.

## Alternative Village Site Consultation



**69** Representors submitted comments on the proposed alternative village site PV37 Well Lane Devauden.

The main issues raised in relation to Devauden are summarised as follows:

GWT object to the development of this site as part is assessed as a UKBAP Priority Habitat and S42 habitat. If development goes ahead then would expect retention and protection of land of higher biodiversity value and protected and priority species taken into account in the development process.

CCW made the following comments:

- The site is within an area currently designated as Special Landscape Area and adjoins the Wye Valley AONB.
- Site would represent a significant extension into the countryside and impact on the landscape setting of the village.

- Seek clarification as to whether PV37 is intended to replace or be considered in combination with PV04. Have concerns on the potential impacts that the combined scale of development would have.

WVAONB made the following comments:

- PV37 is located outside of the AONB and so is preferable to PV04.
- Site is low lying and set against the backdrop of the main developed area of the village.
- Design should take account of the AONB setting.

Devauden Community Council submitted the following comments:

- Limited facilities and services in the village.
- Sewerage plant is at its limit, no mains gas, unreliable water and electricity supplies and poor internet and mobile phone reception.
- Inaccuracies in the assessment of visual impact of the site should be corrected before any decisions are taken.
- Access would require extensive modifications which could impact on the allotments. No footpath available to connect the site to the village.
- Impact on the amenity of residents of Well Lane.
- Previous planning applications on the site have been refused as development could be harmful to the character of the landscape setting of this side of the village.

The landowner of PV37 submitted the following comments in support of the site:

- Outside the AONB.
- Minimal visual impact.
- Close to centre of village.
- Access improvements easily achievable.
- Less congestion for the village.
- Willing to subsidise the scheme and undertake a S106 Agreement to ensure the delivery of the affordable housing element of the development.

The agent acting on behalf of the promoter of CS/0024 Land west of B4295 and north of Devauden submitted the following comments:

- Site PV37 has no current vehicular access from the main highway and it is unlikely that a suitable access can be provided. It is also in a sensitive location in visual terms and is thought to have several protected species and important hedgerows within its boundary.
- Ecological and access issues in respect of PV04 need further investigation prior to potential allocation.
- CS/0024 is a more appropriate site for development as any issues can be mitigated and the site could provide for improved footpath linkages to the village.

88 individuals signed a petition in support of PV37 being the preferred proposal for the next stage of the LDP, stating that at a meeting of the Devauden Community Council held on 01 March 2011 objection was raised to PV37 but that there has been no recent survey undertaken in the village on



the views of local people with regard to any of the submitted proposals. 20 of these individuals also submitted separate comments.

26 individuals signed a petition submitted on behalf of Churchfield Residents, of these 8 individuals also submitted separate comments:

- Object to PV04 Land to the West of Devauden for housing development and the use of Churchfields as an access to the site.
- Endorse PV37 as a better option for housing.

63 individuals submitted comments as follows:

The owner of the access strip for PV04 commented that he had not been consulted.

General Comments:

- Village has a good mix of housing types and is already well provided for in terms of affordable housing.
- No proven local need.
- Lack of local services and facilities.
- New development would support existing services.
- Inadequate water and sewerage services.
- Increase in traffic.
- Shouldn't be taking good agricultural land out of production.
- The comments made by the Community Council are the views of the Council and not the views of the village as a whole.

9 individuals commented that PV37 would be the preferred site if development is required:

- Less visually intrusive.
- Less impact on the village as a whole.
- Easier access to main roads.
- Fewer highways improvements needed to achieve satisfactory access than other sites in the village.

25 representations received in relation to PV37:

- Site has been the subject of a previous planning application which was dismissed at appeal.
- Site located outside the village development boundary.
- Highly visible on the approach to the village.
- Site is adjacent the AONB and currently designated as Special Landscape Area.
- Site includes UKBAP and LBAP habitats.
- Good agricultural land, should not be taken out of production.
- Poor access and visibility splays.
- Major highways improvements and footpath provision needed, thus criterion 4 in the site assessment should be red not amber.
- Impact on neighbours amenity.

- Comments from the Landscape Sensitivity and Capacity Study have been incorrectly applied in the traffic light assessments and should be amended to ensure that they are site specific.

8 individuals commented that PV04 would be the preferred site if development is required:

- Adjacent existing development.
- Less impact on the village in terms of visual impact.
- Sloping nature of site means it would not be highly visible, criteria 16a and 16b should be amber not red.

13 representations received in relation to PV04:

- Poor access.
- Access to the site would involve compulsory purchase of gardens.
- Danger to children with proximity to play area.
- Power lines cross the site.
- Comments from the Landscape Sensitivity and Capacity Study have been incorrectly applied in the traffic light assessments,

1 representation received in relation to CS/0024 Land west of B4295 and north of Devauden:

- Poor access.

1 representation received in relation to CS/0032 Land to the rear of Devauden Hall:

- Unsuitable access directly on to the B4295.

1 representation received in relation to CS/0064 Land South and East of Beaufort House, Devauden:

- Site capable of taking small scale development.

Representations relating to the Candidate Site Assessment 'Traffic-Light' Matrices are considered further in **Appendix 1**.

## Candidate Site Analysis

### CS/0024

This site is located within the Wye Valley Area of Outstanding Beauty; the site would be highly visible, clearly extending the village into its rural approaches from the north. The site has also been identified as being of SINC quality and subsequently has a High biodiversity whole site value; there are therefore considerable biodiversity constraints at the site.

### CS/0032

This site is located within the Wye Valley Area of Outstanding Natural Beauty and would create a significant visual intrusion into the rural approaches to the village from the south-east. There are strong highway concerns in relation to the site, a satisfactory access could probably not be provided, a new junction

off the adjacent section of the B4295 would be unsuitable and the track to the west would be an inappropriate access for any form of development.

#### CS/0064

There would be a significant visual intrusion into the rural approaches to the village from the south-east if this site were to be developed; the site is located within the Wye Valley Area of Outstanding Natural Beauty. There are highway concerns in relation to the site, a satisfactory access could probably not be provided using a new junction off the adjacent section of the B4295, however there could be potential for fronting access for limited development off Chapel Road if local widening was undertaken across the frontage.

#### PV04

This site was originally considered as a potential site for residential development. Following the Proposed Rural Housing Allocations Consultation a number of concerns were raised relating to an increased danger to children of additional traffic travelling through the existing housing development due to the proximity of an existing play area to the site. Within the Highways assessment of the site it is noted that an access through Wesley Way is preferable, although it could also be accessed through Churchfields. The site is also linked in terms of pedestrian access to the heart of the village. Further information has been received by the landowner where it is noted that in ownership terms the site can be accessed through Churchfields as the narrow strip at the end of Churchfields is also in the proposer's ownership.

#### PV37

The site at Well Lane was brought forward during the Proposed Rural Housing Allocations Consultation and was the subject of another further informal consultation relating to alternative village sites. This site is the only site brought forward within the Devauden area located outside the Wye Valley Area of Outstanding Natural Beauty although it is located in an area currently allocated as a Special Landscape Area. The site was previously refused at appeal by an Inspector in 2005. Subsequently, measures have been put in place to provide additional screening to minimise any effect on the wider landscape. In a revised assessment Highways have stated that although vehicular access to the site can be provided there would be difficulty in achieving sufficient pedestrian links to the rest of the village which would make it inappropriate in highway terms. The landowner has subsequently suggested that measures can be put in place to provide this pedestrian link. Well Lane would also be required to be widened along the extent of the proposed frontage and part of the existing hedgerow may need to be lowered to provide additional visibility.

### **Clarification of Landscape Assessment**

There was an error in the originally published traffic light assessment in that different entries were provided for sites PV04 and PV37 when they should have been the same as both are in the same landscape character area. For consistency all the entries in the traffic light matrices for village sites relating to landscape include the description of the whole character area rather than

attempting to interpret the findings of the study. In this case, however, the assessment does suggest that development to the north of the minor road leading to Wolvesnewton (i.e. part of PV04) does have some capacity if carefully designed and retaining and enhancing existing hedgerows and tree cover, preferably in advance of any development in order to minimize visibility from north and south. It also comments that the slopes to the north of the lane are less prominent falling on a minor valley side with overgrown hedgerows and trees. The assessment also comments that extending the village to the south beyond the logical edge defined by the minor road would be highly visible.

#### **Council's Response:**

Devauden is a relatively sustainable settlement by Monmouthshire standards having a public house and a range of community facilities. The evidence points to a widespread need for affordable housing in the rural parts of Monmouthshire and a need for 20 affordable dwellings in the Devauden Community Council area was established in the Welsh Rural Housing Enabler Study. While it is recognised that, in landscape terms, PV04 probably represents a better prospect than PV37, access to the latter site raises far less concerns as it does not introduce traffic through existing residential areas.

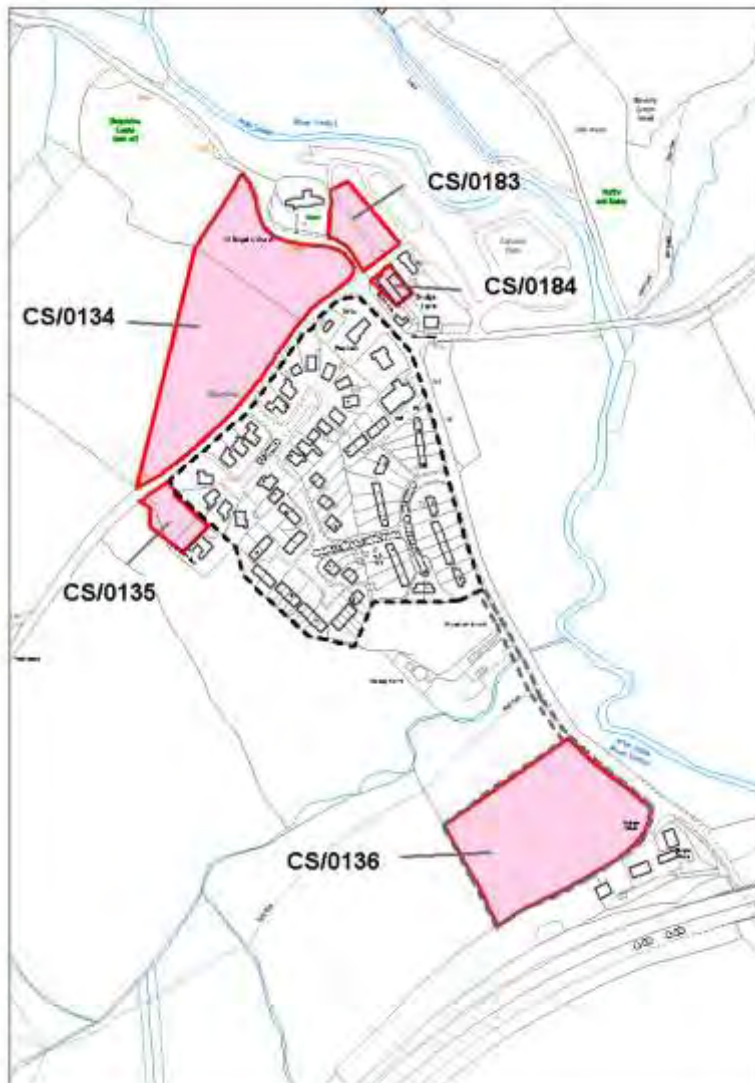
#### **Conclusion:**

Devauden is designated as a Main Village under Policy S1 of the Deposit LDP.

PV37 Land at Well Lane is allocated in the Deposit LDP for a maximum of 15 dwellings.

The existing VDB is reaffirmed, subject to an extension to include the proposed housing allocation.

## 4. DINGESTOW



**11** Representatives submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Dingestow are summarised as follows:

GWT has no objection to CS/0136 but would expect retention and protection of trees and hedgerows and protected and priority species to be taken into account in the development process.

GGAT commented that CS/0136 has no known archaeological restraints. No reason for not allocating.

CCW commented that CS/0136 could contribute to ribbon development, contrary to PPW para 9.3.1, and Test of Soundness C2.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities in the village as being acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that in relation to CS/0136 the proposal for allocation is at odds with the Landscape Sensitivity and Capacity Report.

7 individuals submitted comments as follows:

General comments:

- Lack of local facilities and services.
- No mains gas.
- Problems of continuity of electricity supply and broadband speed.
- Problems of drainage and sewerage capacity.
- Flooding issues due to proximity of the River Trothy.
- Sensitivity of church and castle area.
- Increased threat to wildlife.
- Increased traffic through the village.
- Increase in crime due to low income housing.

1 representation received in relation to CS/0136:

- Bottom end of the site has flooding issues.
- Difficulty of safe access.

## Candidate Site Analysis

### CS/0134

This site is located in the sensitive setting of St Dingat's Church a Grade II\* listed building and would also have a severe impact on the setting of Dingestow Castle a Scheduled Ancient Monument. This site is therefore not considered appropriate for development.

### CS/0135

This site represents a potential rounding-off area but is restricted in size, the site could only accommodate a couple of dwellings along the frontage of the adjacent road. It is however considered that development of CS/0136 would provide sufficient land to meet the required housing need in Dingestow and therefore there is no requirement for an additional number of dwellings at this site.

### CS/0136

Whilst the site is somewhat detached from the village, it does provide the best development opportunity within Dingestow. There is an area of Zone C2 floodplain adjacent the site separating it from the main part of the village by the stream running eastwards to the River Trothy; the adjacent field although in flood plain contains an open space area and garaging compound. The site has a natural boundary to the south of the embankment surrounding the existing buildings of Station House. It is conspicuous in the wider landscape but is low lying and whilst not ideal does represent the only development

opportunity to meet the community council aspirations to meet the high level of existing need.

#### CS/0183

Part of this site is located in Zone C2 floodplain and would therefore be unsuitable for a residential use. The whole of the site is located in the sensitive setting of St Dingat's Church a Grade II\* listed building. This site is not considered appropriate for development.

#### CS/0184

This is a small site currently occupied by former agricultural buildings. In highway terms it is suggested that the access to the site could only accommodate one dwelling. Part of the site is also located within Zone C2 floodplain and would therefore be unsuitable for a residential use. This site is not considered appropriate for development, the development of CS/0136 would provide sufficient land to meet the required housing need in Dingestow and there is therefore no requirement for an additional dwelling at this site.

#### **Council's Response:**

In the UDP Dingestow is categorised as a Policy H4 infill settlement. However, it does have a relatively good range of community facilities and access to bus services and there is a high level of need in the community council but limited opportunities for development. CS/0136 is considered to be the most satisfactory of the opportunities.

#### **Conclusion:**

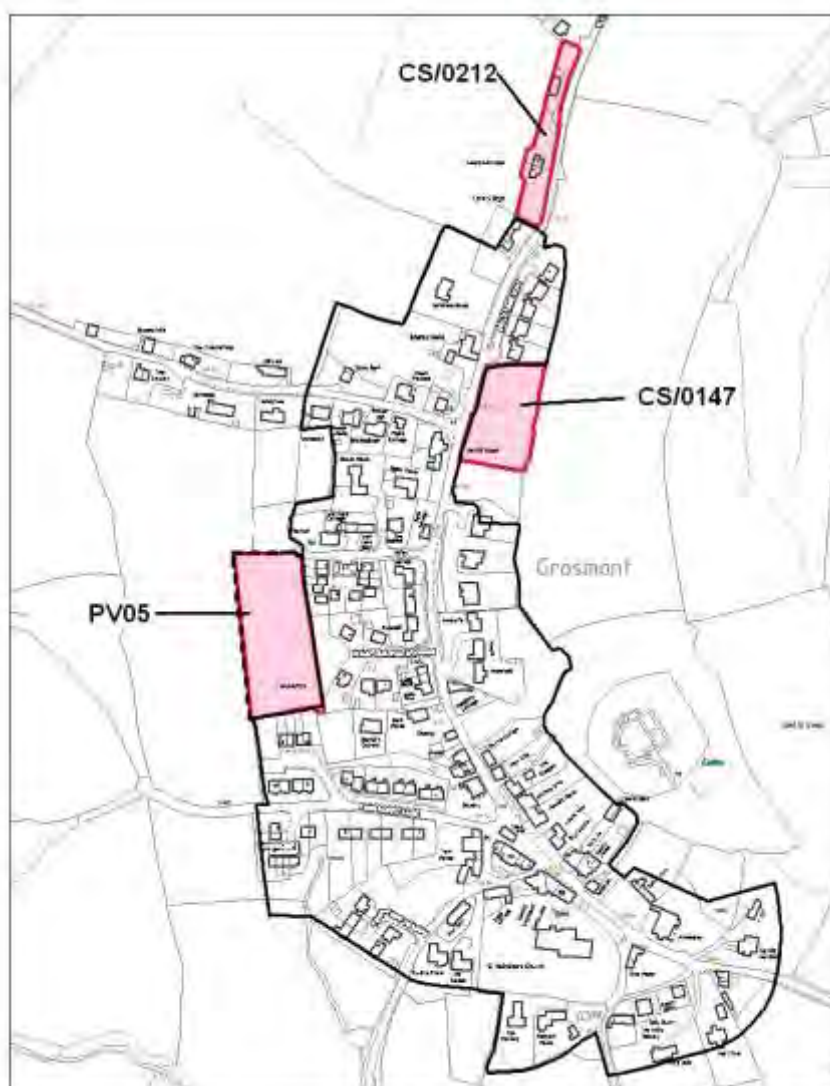
Dingestow is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/0136 Land to the south east of Dingestow is allocated in the Deposit LDP for a maximum of 15 dwellings.

A VDB is drawn around the existing development with an extension to incorporate the above housing allocation.



## 5. GROSMONT



**43** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Grosmont are summarised as follows:

GWT has no objection to PV05 but would expect retention and protection of trees and hedgerows and protected and priority species to be taken into account in the development process.

GGAT commented that PV05 has no known archaeological restraints. No reason for not allocating.

CCW commented that any development of PV05 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.



Dwr Cymru Welsh Water has confirmed sewerage and water facilities in the village as being acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that due to the high visibility of PV05 any development will need to incorporate appropriate planting with a definitive buffer to the west and south, with a recommendation for a reduced density.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV05 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council commented that in relation to CS/0147 there are concerns over the views from, and of the castle. In relation to CS/0212 the broken built form on the approach to the village is important.

Grosmont Community Council oppose the allocation of PV05 on the grounds of poor access, increased traffic and insufficient infrastructure, services and facilities.

The agent acting on behalf of the promoter of CS/0212 submitted the following comments:

- Site is within existing residential curtilage.
- The Council's scoring of the site against sustainability criteria is inconsistent.

The promoter of CS/0147 submitted comments in support of the site:

- Site is within the existing settlement footprint.
- Part of the site could be classified as brownfield.
- Satisfactory access is achievable, no reasonable justification is provided in the Council's highways assessment for its negative recommendation.
- Site is not located within an area designated for its international, national or local biodiversity importance.
- The site is well screened in views from the castle, the listed building and road.

A Supporting Planning Justification for residential use was submitted with the Candidate Site submission. This justification provides; further explanation of the questions set out in the Candidate Site Assessment Form, an assessment of planning and sustainability objectives of national planning policy and; a discussion on the most appropriate form of development the site is capable of accommodating. The proposers of the site have also put forward a document containing their representations on the proposed housing allocations in Grosmont. The document contains a plan showing the existing and proposed settlement form of the site and Grosmont, an Affidavit for residential use, supplementary highways information, photographic evidence, a plan showing public footpaths around Grosmont, details of a planning application relating to the redevelopment of the Swiss Cottage site and Architectural Study Material.

37 individuals submitted comments as follows:

General comments:

- Village should not be classified as a 'Main Village'.
- The Council's assessment of sites against Sustainability Criteria fails the Test of Soundness CE2, the robustness of the evidence base.
- The Consultation Draft Report is not sufficiently flexible as the preferred site alone would not meet the identified local need. It fails The Test of Soundness CE4.
- Should be a proven current need for affordable housing. Village has already experienced recent significant growth with outstanding planning permissions awaiting construction.
- Sensitivity of conservation area, church and castle.
- Lack of local facilities and services.
- No mains gas.
- Problems of continuity of electricity supply and broadband speed.
- Problems of drainage and sewerage capacity.
- Flooding issues due to proximity of the River Trothy.
- Infrastructure and increase in facilities should be addressed before further development.
- Increased threat to biodiversity and important landscapes.
- Increased traffic through the village.
- Increase in crime due to low income housing.

4 representations received in support in principle of further development in the village.

13 representations received in relation to CS/0147:

- Good access to the village road.
- Would represent in-filling.
- Less intrusive to neighbouring properties and their views.

3 representations received in relation to CS/0212:

- Good access to the village road.
- Would classify as ribbon development.

24 representations received in relation to PV05:

- Poor access, with increased danger to children.
- Greenfield land.
- Site is larger than required for proposed number of houses.
- Biodiversity and landscape issues.
- Exacerbation of flooding issues along Poorscript Lane.
- Devaluation of nearby properties.

## Alternative Village Site Consultation



**40** Representors submitted comments on the proposed alternative village site PV05a Land to the West of Grosmont.

The main issues raised in relation to Grosmont are summarised as follows:

GWT has no objection to the development of the site but would expect retention and protection of hedgerows, trees and waterways and protected and priority species taken into account during development.

CCW commented as follows:

- PV05 is likely to provide a more integrated extension to the settlement than PV05a where development could lead to the loss of character and visual amenity.
- If PV05a is allocated the existing linear landscape features to the south and south east of the site should be protected. A landscape buffer should

be provided on the western and northern boundaries of the site to provide a firm defensible boundary and to mitigate any visual impacts.

Grosmont Community Council submitted the following comments:

- Unsuitable site access.
- Lack of local services and facilities.
- Lack of sewerage capacity.
- Council should look at other village sites for a small development of affordable housing.

143 individuals signed a petition submitted on behalf of Action for sustainable Grosmont, of these 28 individuals also submitted separate comments:

- In favour in principle of providing affordable housing for local people but object to PV05a for housing development.
- Housing need in the village should be met by infill development only.
- Riverview site should be re-examined for housing.
- Grosmont should not be designated as a major village.

36 individuals submitted comments, with 18 submitting a standard letter:

General Comments:

- Grosmont should not be classified as a major village.
- Lack of local services and facilities.
- Lack of sewerage capacity.
- Problems of electricity and internet capacity.
- No mains gas.
- Poor road access to the village.
- Village already experienced much recent development.
- High proportion of affordable housing already in the village.
- No proven local need.

35 representations received in relation to PV05a:

- The site is Greenfield land which protrudes beyond the prevailing built edge of the village.
- Impact on the setting of the Special Landscape Area.
- Poor access.
- Poor surface water drainage.
- Proximity of conservation area.
- Site contains historic hedgerows and protected species.
- The initial assessment of Sites against Sustainability Criteria should be amended as there are inaccuracies in how criteria have been applied.

8 representations received in relation to CS0147 Land known as Riverview:

- Partially brownfield land.
- The only site which provides a natural rounding off of the existing village.
- Contained on three sides by existing residential development.
- Direct access to a main highway.

2 representations received in relation to CS0212 Lawns Cottages:

- Partially brownfield land.
- Direct access to a main highway.

### Candidate Site Analysis

#### CS/0147

Whilst this site may appear sustainable, it would have an adverse impact on both the landscape and the historic environment. The site is located in a particularly prominent location on the sensitive eastern edge of the settlement within the setting of Grosmont Castle Scheduled Ancient Monument, with significant views to and from the Castle. The site is also located within the Grosmont Conservation Area. The significant impact on the landscape and historic environment is considered to rule out any proposed development in this location.

#### CS/0212

This site plays an important role in the broken built form on the approach to the village from the north. The site is of a limited size with restricted depth; it would represent an undesirable ribbon development to the north of the village, would make little contribution to meeting housing need in the village and is not considered appropriate for development.

#### PV05

The western edge of this settlement is considered to be the least sensitive in terms of landscape in view of the overall sensitive nature of Grosmont. PV05 is located within a character area that has been identified as having potential capacity for some residential development in landscape terms; the lower slopes south of the existing Bevan Court housing estate offer some opportunity for expansion, although this development would have to be carefully implemented. The site can be accessed in terms of highways and pedestrian access can also be provided to the site. As well as housing the site could make provision for community open space in the form of allotments or a children's play area, which would be of benefit to other residents within the area. It is considered that this site offers the best opportunity for development within the Grosmont area with the least impact on landscape and could deliver valuable open space for the community.

#### PV05a

PV05a was the subject of a further informal consultation relating to alternative village sites, this L shaped site is located adjacent Wellfield and Poorscript Lane. The original site was amended to form more of a 'rounding off' of development but also to enable what seemed to be an achievable access in land ownership terms off Poorscript Lane. The western edge of this settlement is considered to be the least sensitive in view of the overall sensitive nature of Grosmont in terms of landscape. PV05a is located within a character area that has been identified as having potential capacity for some residential development in landscape terms; the lower slopes south of the existing Bevan Court housing estate offer some opportunity for expansion, although this development would have to be carefully implemented. There are

however concerns in terms of providing a vehicular access to the site, given the poor junction with the main road through Grosmont. Residents have raised further concerns in relation to the safety of additional traffic movements along Poorscript Lane. The original site at PV05 is considered to offer the most appropriate opportunity for development in the Grosmont area as it allows for a better means of access along Well Lane to the north that has less impact on existing residents and raises less safety concerns .

#### **Council's Response:**

Grosmont despite its remote location has a good range of facilities and is an important settlement in the County, due to its high quality conservation area status and historic interest for visitors. Government advice in TAN6 is that where development proposals are intended to meet local needs, Planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car. It is considered appropriate, therefore, to provide for some housing in Grosmont to help meet the local need for affordable housing. PV37 is considered to offer the best option for development for the reasons set out above.

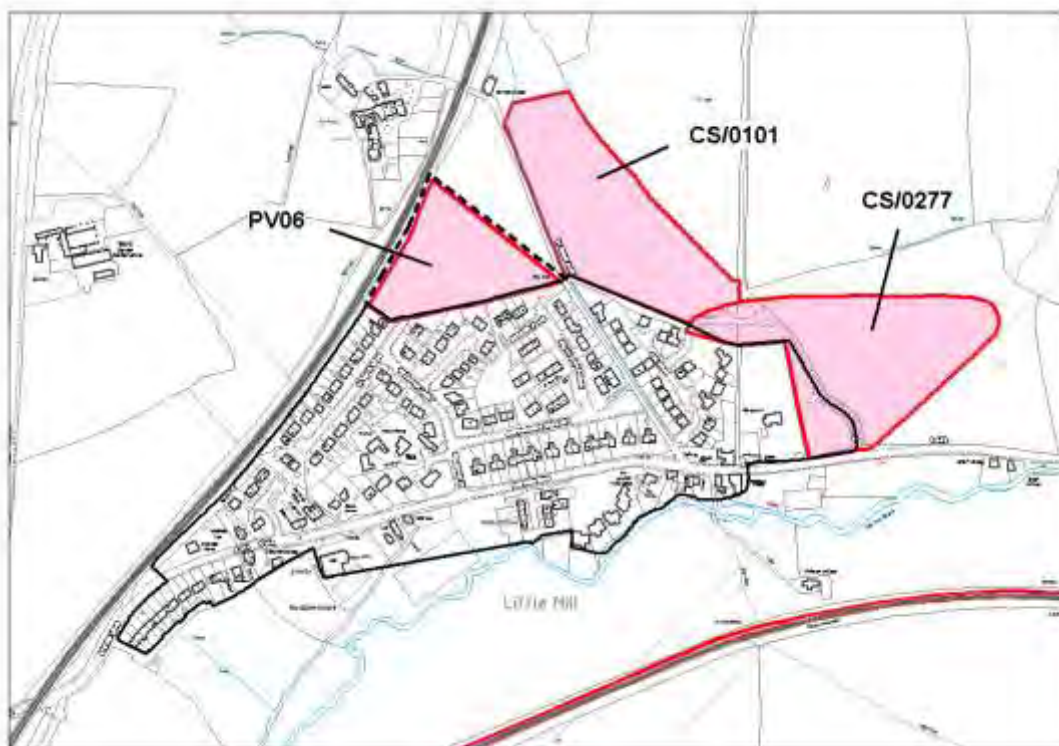
#### **Conclusion:**

Grosmont to be designated as a Main Village under Policy S1 of the Deposit LDP.

PV05 Land to the west of Grosmont is allocated in the Deposit LDP for a maximum of 15 dwellings, subject to provision of community open space (play area/allotments).

The existing VDB is reaffirmed, with an extension to include the proposed housing allocation.

## 6. LITTLE MILL



**31** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Little Mill are summarised as follows:

GWT made the following comments in relation to PV06:

- No objection to the development of the site but would expect retention and protection of hedgerows and mature tree during development.
- The railway embankment as an important ecological corridor should be protected during development.
- Protected and priority species to be taken into account in the development process.

GGAT commented that PV06 has no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Hard to justify the allocation of PV06 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)
- Unclear what part of PV06 is to be allocated.
- Any development of PV06 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

Dwr Cymru Welsh Water confirmed sewerage and water facilities in the village as being acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that in relation to PV06 planting will help screen views from the A472.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV06 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Goetre Fawr Community Council commented that there is no demand for affordable housing. The village has a lack of local amenities, and problems with flooding and sewerage capacity.

The owners of site PV06 have confirmed that they would like the site to be considered for development in the LDP. 2 agents acting on behalf of the landowner and the promoter of PV06 submitted supporting comments:

- Railway line provides the site with a strong defensible boundary.
- Logical rounding-off of the village.
- Less visible impact on the area.
- Existing access to the site.
- Whole of site is suitable for residential development.
- The viability of the 60% requirement for affordable housing is questioned.

23 individuals submitted comments as follows:

General Comments:

- Village should not be classified as a 'Main Village'.
- No proven need for affordable housing.
- Additional housing would exacerbate existing traffic problems.
- Insufficient infrastructure or amenities to support further housing
- Problems of surface water drainage and sewerage capacity.
- Problems of continuity of electricity supply.
- Devaluation of nearby properties.
- Increase in crime due to low income housing.

2 representations received in relation to CS/0101:

- Less impact on existing properties.
- Access available from the main road.
- Any development would add to flooding risk.

5 representations received in relation to CS/0277:

- Less impact on existing properties.
- Access available from the main road, away from existing residential areas.
- Any development would add to flooding risk.



17 representations received in relation to PV06:

- Greenfield land, classified as Grade 3 agricultural land and is in regular use.
- Impact on, biodiversity and habitat.
- Impact on landscape, character and appearance of the village.
- Visual prominence of the site.
- Possible increase in flooding of surrounding area.
- Poor access.
- Increased traffic and reduced road safety.
- Proximity to the railway line.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Little Mill:

1 individual submitted supporting comments in relation to PV06:

- Site is well related to the settlement pattern of the village.
- Discreet in the wider landscape.
- Easily accessed

### Candidate Site Analysis

#### CS/0101

This site is located within a character area that has medium capacity and medium sensitivity however it is located in an exposed location within this character area and is not particularly well related to the settlement.

#### CS/0277

Even though this site is located in a character area that has an overall medium capacity and sensitivity, it is considered that this site is located in a prominent position on the entrance to the village and if developed would alter the existing form of the village significantly. It is likely the site could be accessed but there are concerns relating to highway capacity.

#### PV06

This site is considered to be less conspicuous in the surrounding landscape and is better related to the existing settlement form, although the original site area has been substantially reduced as it is only required to accommodate 15 dwellings. The site can be accessed easily using the existing access from Ty Gwyn in the south west corner of the site. It is considered that this site would have the least impact on the village of Little Mill in both landscape and highway terms.

**Council's Response:**

Little Mill has a relatively good range of facilities and is in an accessible location. PV37 is considered to be an appropriate site that does not have any significant adverse landscape impact and can be satisfactorily accessed.

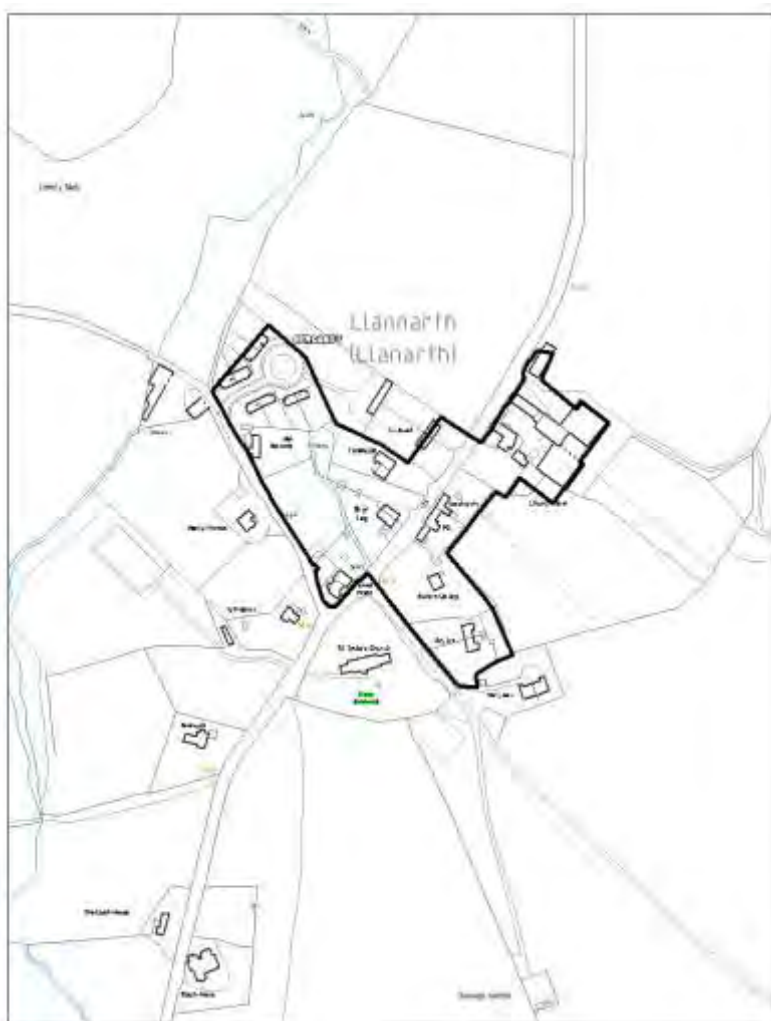
**Conclusion:**

Little Mill is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV06, Land to the north of Little Mill, adjacent the settlement, is allocated in the Deposit LDP for a maximum of 15 dwellings.

The existing VDB is reaffirmed, subject to an extension to include the proposed housing allocation.

## 7. LLANARTH



No comments were submitted on the Proposed Rural Housing Allocations report and its proposals in relation to Llanarth.

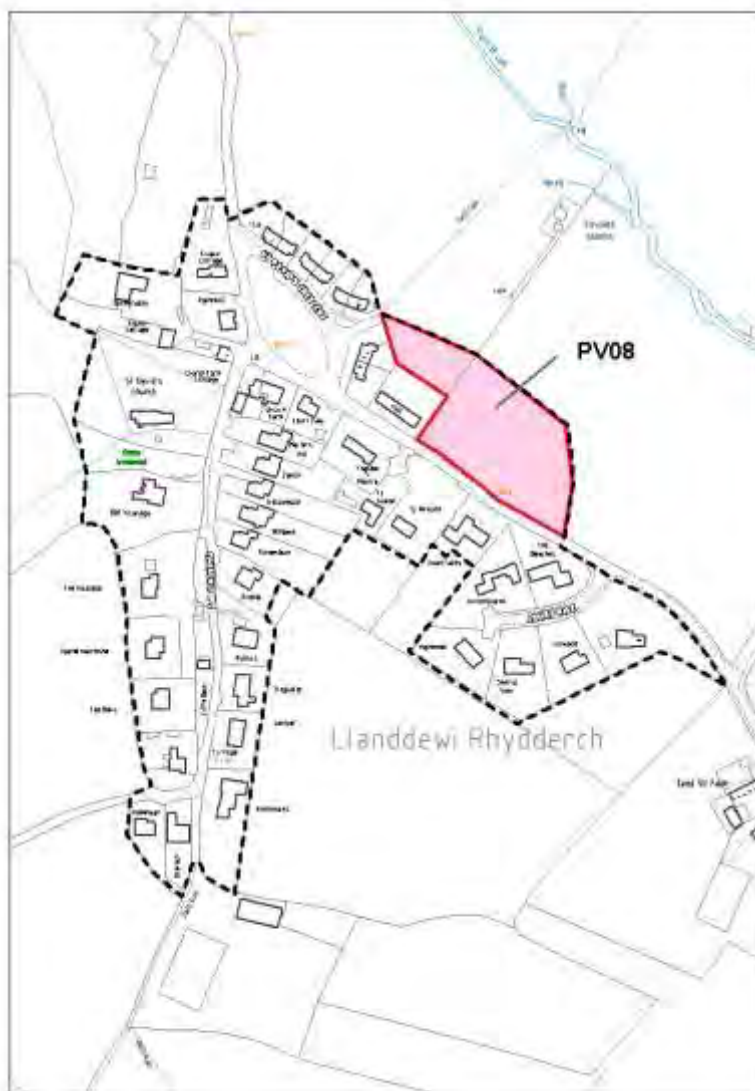
### **Council's Response:**

Llanarth is relatively remote and small in size, located within a sensitive landscape setting. It has limited community infrastructure. In the UDP the settlement is designated as a Policy H3 village and has a VDB. Within the VDB there is an identified opportunity for up to four dwellings, which is a longstanding allocation that there appears to have been no interest in taking up. It is understood that the Llanarth Estate owns the majority of the land surrounding the village and the Estate appears not to wish to release land for development. A recent development for six affordable homes has been carried out under the rural exceptions policy. There seems to be limited opportunity for making any housing allocations in the village.

### **Conclusion:**

Llanarth, under Policy S1 of the LDP, is designated as a Minor Village where small scale infill residential development will be allowed subject to LDP Policy H3.

## 8. LLANDDEWI RHYDDERCH



**14** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llanddewi Rhydderch are summarised as follows:

GWT has no objection to PV08 but would expect retention and protection of hedgerows and protected and priority species to be taken into account in the development process.

GGAT commented that PV08 has no known archaeological restraints. No reason for not allocating.

CCW commented that any development of PV08 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

Dwr Cymru Welsh Water has confirmed sewerage facilities in the village as being acceptable but has advised that development site is at a height where mains water cannot be guaranteed at all times

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that the density may be too high to allow a scheme appropriate to the character of the village.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV08 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Llanover Community Council commented that PV08 is in principle approved, however there should be no more than 4 new houses on part of the site. The sewage system is oversubscribed, access to the village is difficult and the village is not served by public transport. Other sites put forward by the Rural Housing Enabler should be considered.

1 individual submitted an alternative site on the eastern side of the village for consideration. Comments in support include:

- Land is adjacent to existing housing and the main road.
- The site would make a natural extension to existing boundaries.
- The land is currently not used for agricultural purposes.

The owner of PV08 has stated that he is willing to consider any proposal but has expressed concern about the standard of design of any proposed development given the Council's recent planning decisions in the County. It is suggested that a small development to the rear of the village hall or on the northern edge of the village might be preferable.

#### 7 individuals submitted comments as follows:

##### General Comments:

- Is a hamlet not a main village.
- No proven local need for affordable housing.
- Need guarantee that only affordable housing will be built, no need for more market housing.
- Insufficient infrastructure or amenities to support further housing
- Poor access to the village.
- Increased traffic and noise levels, question of road safety.
- Problems of sewerage capacity.

##### 4 representations received in relation to PV08:

- Agricultural land which is actively farmed.
- Site is too large for number of houses proposed.

- Problems of surface water drainage and flooding from Pant Brook.
- Devaluation of neighbouring properties.

### Candidate Site Analysis

#### PV08

It is considered that this site should be decreased in size to accommodate a small amount of growth to the rear of the village hall adjacent the existing residential development at St. David's Crescent. This site would represent a rounding off of the village without detrimental effect on the surrounding landscape.

#### **Council's Response:**

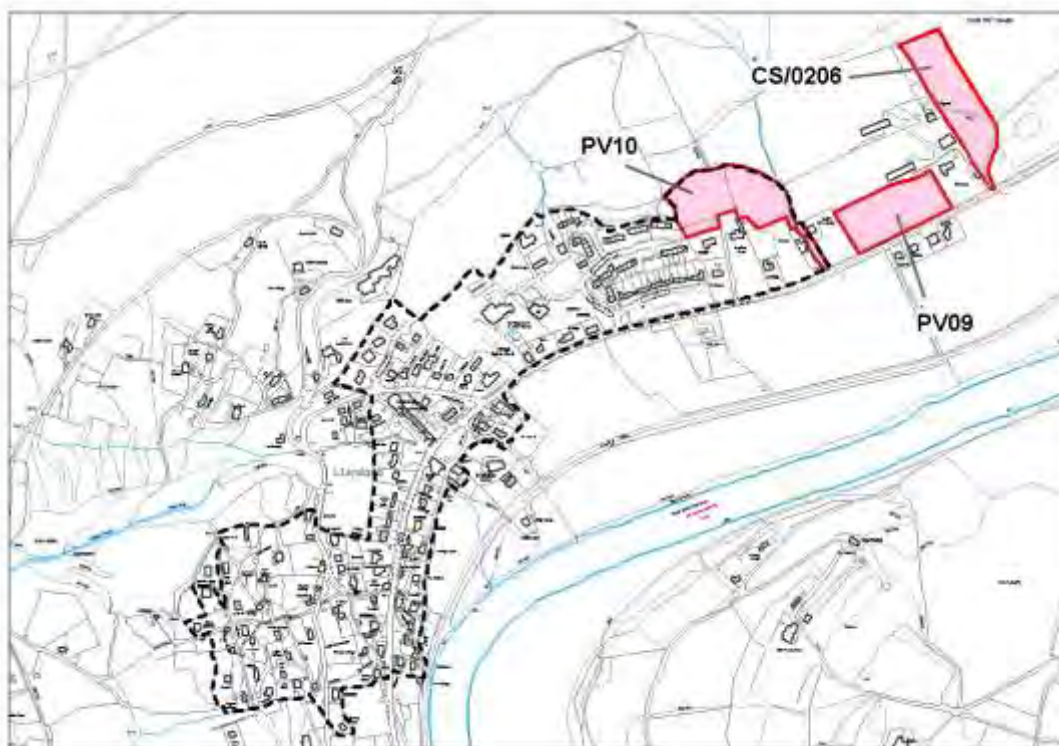
The settlement is small with poor accessibility and a relatively limited amount of community facilities. It is currently a Policy H4 infill village in the UDP. It is considered, however, that the vitality of the community would be enhanced if land could be brought forward for a small housing development. A small site is allocated therefore although it is recognised that provision of a water supply may present a difficulty. The views of the Community Council are agreed with and the site will be decreased in size to 5 dwellings.

#### **Conclusion:**

Llanddewi Rhydderch is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV08, Land to the rear of the village hall, is allocated in the Deposit LDP for a maximum of 5 dwellings.

## 9. LLANDOGO



**18** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llandogo are summarised as follows:

GWT made the following comments:

- No objection to the development of PV09 but would expect retention and protection of hedgerows and protected and priority species to be taken into account in the development process.
- Object to the development of PV10 as identified as a borderline SINC with significant protected species issues.

GGAT commented that as PV09 and PV10 are within the Wye Valley AONB, ASIDOHL procedures should be carried out prior to allocation.

CCW made the following comments:

- PV10 is of 'high' biodiversity value and potential SINC quality and in proximity to a SAC, it should be screened as part of the Habitat Regulations Assessment (HRA).
- A bat roost has been identified in an adjacent property to PV10, to meet the Test of soundness CE3 any development must comply with the Habitats Regulations.
- Hard to justify the allocation of PV10 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6

(para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)

- PV09 could contribute to ribbon development, contrary to PPW para 9.3.1, and Test of Soundness C2.
- Village is within AONB and allocation exceeds identified housing need for the Community Council area. Possible conflict with national policy and legislation relating to AONBs, thus proposal fails to meet Test of Soundness C2.

WVAONB made the following comments:

- PV10 would be preferable to PV09, as PV09 would lead to ribbon development and be more prominent in the landscape.
- Before development of PV10 an assessment of long distance views would be required with mature trees retained wherever possible.

Dwr Cymru Welsh Water has confirmed sewerage facilities as being acceptable but has advised that there are some water supply problems in the area.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that any development around this settlement would be inappropriate in landscape terms.

The Biodiversity and Ecology Officer for Monmouthshire County Council recommends that PV10 not be allocated as it is a potential SINC and in close proximity of a Bat SAC. Further ecological assessment will be necessary for PV09, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Trellech Community Council submitted the following comments:

- Building on Greenfield sites is unwelcome.
- Lack of infrastructure and services in village.
- The owners of PV10 are not willing to release the land for housing.

The landowners of PV10 submitted the following comments:

- No intention of releasing the land for development.
- The land is important for its flora and fauna.
- Llandogo in comparison to other villages in the Community Council area has already seen a great deal of development, particularly 'social housing'.
- Better sites in the village which should be considered, particularly Council owned land.

The owners of the western part of PV09 have confirmed that they wish to see the land considered for development in the LDP. The owner of the eastern side of the site has stated that he does not wish the land to be considered for development.



A letter has been received from Parklands Farm, which includes the eastern part of PV09, advising of their intention to re-commence an intensive free range chicken enterprise on the holding.

An alternative site has been suggested for development to the east of The Priory and to the north-west of Holmfield Drive.

10 individuals submitted comments as follows:

1 representation in support in principle of affordable housing in the village.

General Comments:

- Lack of a long-term plan for the village.
- Development would set a precedent for building in the AONB.
- Use of greenfield land within the AONB.
- Further development will impact on tourism.
- Impact on the Conservation Area and important views in the AONB.
- The village has already experienced significant growth and has a number of low cost homes.
- Insufficient amenities to support further housing.
- No evidence of need.

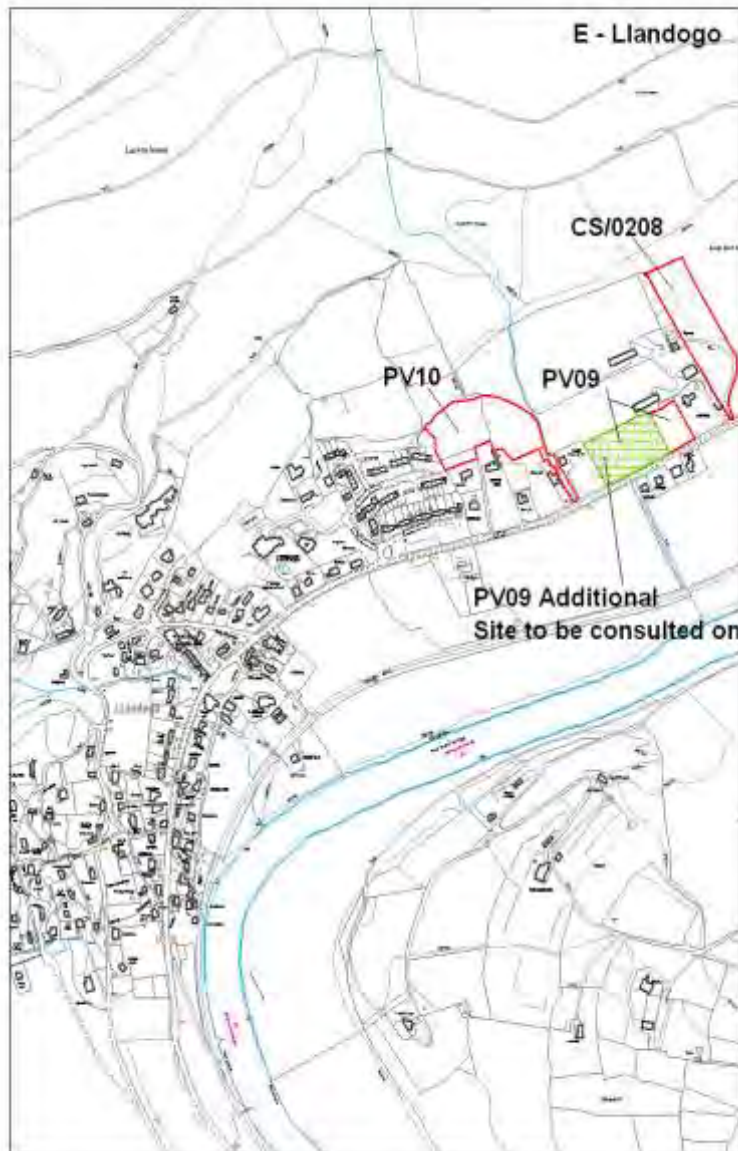
1 representation received in relation to PV09:

- Site scores overall amber or red against the sustainability indicators.
- Site biodiversity value is medium, biodiversity issues have not been addressed.
- Adjacent SSSI and bat SAC.
- Site is adjacent the busy A466, question of safety.

4 representations received in relation to PV10:

- Site scores overall amber or red against the sustainability indicators.
- Site biodiversity value is high, biodiversity issues have not been addressed.
- Adjacent SSSI and bat SAC.
- Access, the road has already experienced an increase in traffic in recent years.
- Area prone to flooding.
- Height of site means any development will overlook neighbouring properties.
- If development goes ahead then PV10 is the least visually obtrusive site and geographically part of the village.

## Alternative Village Sites Consultation



**8** Representors submitted comments on the proposed alternative village site PV09 Land to the East of Llandogo.

The main issues raised in relation to Llandogo are summarised as follows:

GWT has no objection to the development of the site and support it as an alternative to PV10 Land adjacent Holmfield Drive. Potential impact on habitats and protected species need to be considered during development as site is located close to the River Wye SAC and Wye Valley and Forest of Dean Bat Sites SAC.

CCW commented as follows:

- PV09, if developed, contributes to further ribbon like development of the village.

- Given proximity to the River Wye SAC and Forest of Dean Bat sites SAC potential impacts should be screened as part of the Habitat Regulations Assessment.

WVAONB reiterated previously expressed concerns that development of the site would lead to ribbon development and be prominent in the landscape. Before development an assessment of the impact on long distance views would be required with layout and materials used critical if the site is not to have a detrimental impact on the AONB.

Trellech Community Council commented that the plans for the village showed a lack of long-term vision. PV09 would extend ribbon development of the settlement along the Wye Valley.

#### 4 individuals submitted comments as follows:

General comments:

- Village is in an area of outstanding natural beauty and within a designated Conservation Area.
- No evidence of local need.
- Lack of local facilities and services.

4 representations received in relation to PV09:

- Visual impact on entrance to the village.
- Greenfield site.
- Potential loss of Grade 3 agricultural land.
- Divorced from the existing village development boundary.
- Represents ribbon development.
- Site is adjacent to the busy A466.
- Poor access, improvements would require removal of hedgerow and trees.
- Proximity to the Forest of Dean Bat sites SAC.
- Proximity to poultry sheds which are likely to be used in the future.

2 representations received in relation to PV10

- Less visually intrusive.

Representations were made by a planning consultant acting on behalf of objectors against development at PV09. These representations were set out in a submission document and as well as a section on objections includes information on the following; current development plan and emergence of the Monmouthshire Local Development Plan, Site Location and Description, a copy of a dismissed appeal relating to an agricultural access dated August 2007 (note this has however since been approved following a subsequent planning application- DC/2008/00196 approved June 2008) and a letter relating to intensive poultry farming at the adjacent farm.

## Candidate Site Analysis

### CS/0206

This site was not considered to be compatible with the Preferred Strategy due to its somewhat isolated location outside of the village. It has therefore not been assessed in detail.

### PV09

This site has decreased in size since the initial consultation and it is considered the western area of the site be the most appropriate site for development of a small number of dwellings in Llandogo. The development would have to be carefully implemented as the landscape surrounding Llandogo is particularly sensitive due to its location within the Wye Valley Area of Outstanding Natural Beauty. An ASIDHOL assessment would be required at a detailed planning stage to determine if there would be any impact of the development on the Historic Landscape. There may be a need to provide a pedestrian refuge to improve access to the footpath on the opposite side of the road.

### PV10

This site was originally considered as a potential site for residential development, however following the proposed rural housing allocations consultation a number of concerns were raised relating to the high biodiversity value and proximity to a bat roost in an adjacent property. Part of the site is of borderline SINC quality and it is also in close proximity to a designated Bat SAC. There are also issues with ownership of the site that cannot be overcome.

### **Council's Response:**

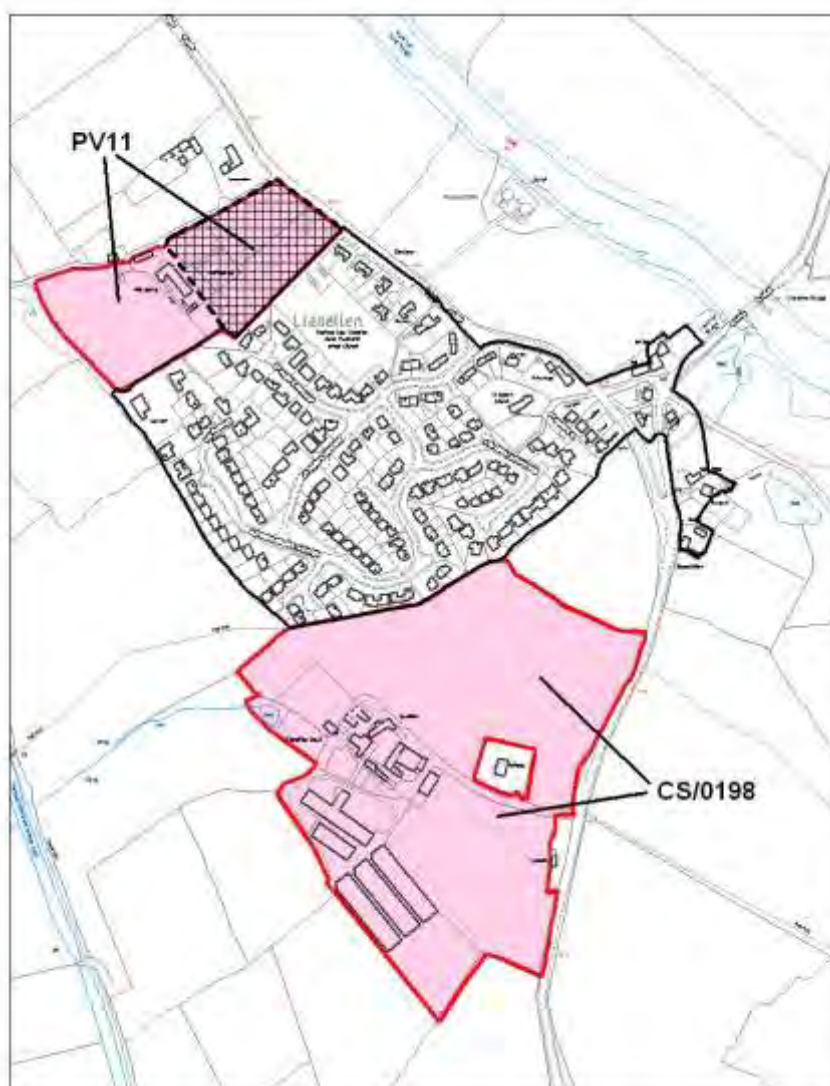
Llandogo was re-classified to be a Policy H4 infill village without a VDB in the UDP following the recommendation of the UDP Inspector, on the basis that there only existed opportunities for minor infill development within the settlement. However, it is a very sustainable settlement, having a school, a recently built village hall, a public house and general store. PV09 is not ideal as it is a form of ribbon development in a sensitive landscape setting. It does, however, provide an opportunity for meeting local needs in a very suitable settlement in social and economic terms.

### **Conclusion:**

Llandogo is designated as a Main Village under Policy S1 of the Deposit LDP.

PV09, Land to the east of Llandogo, is allocated in the Deposit LDP for a maximum of 15 dwellings.

## 10. LLANELLEN



**91** Representors submitted comments on the **Proposed Rural Housing Allocations Rural Housing Consultation Draft** and its proposals.

The main issues raised in relation to Llanellen are summarised as follows:

GWT made the following comments in relation to PV11:

- Object to the site if found to qualify as a UKBAP Priority Habitat and S42 habitat.
- If surveys find the site is of low value then would expect retention and protection of hedgerows and protected and priority species to be taken into account in the development process.

GGAT has no objection to PV11 but archaeological evaluation needed prior to planning permission.

CCW Commented that it was unclear what part of PV11 is to be allocated.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities to be acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that the area is of low capacity for development and thus it would be inconsistent to allocate PV11.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV11 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Llanfoist Fawr Community Council submitted the following comments:

- Any identified local need already provided for by developments in Llanfoist..
- Lack of infrastructure and services in villages.

Llanellen Parish Association submitted the following comments:

- Village has clearly defined boundaries, expansion into the countryside will have a detrimental visual impact.
- Insufficient infrastructure or amenities to support further housing.
- Problems of flooding and sewerage capacity.
- Limited capacity of the road network to cope with extra traffic.
- Recent development nearby, no need evidenced in village itself.

The agent acting on behalf of the promoter of CS/0198 submitted supporting comments:

- There is a pedestrian link between the site and the Village Hall and shop
- Already established that part of the site is acceptable in landscape terms.

The agent acting on behalf of the landowner of PV11 confirmed that they would like the site to be considered for development in the LDP and submitted supporting comments:

- The site is adjacent the settlement so minimises any impact on the open countryside.
- Site is low grade 4/5 agricultural land.
- Safe access by foot to village facilities and transport links.
- Safe and easy access achievable from B4269 without adverse impacts on existing traffic.
- The site is outside any designated flood zone.
- No none legal restrictions or covenants on the land.

82 individuals submitted comments, with 59 submitting a standard letter:

1 representation received stating that they had no objection to the proposals.

General Comments:

- Village already experienced significant recent development.

- Need for affordable housing already provided for by developments in Llanfoist..
- Lack of infrastructure and amenities.
- Sewerage capacity, most of existing system privately owned.
- Possible affect on River Usk SAC.
- Accessibility of the village.
- Present single access to village affords security, this would be compromised if new access points created.
- Exacerbation of already high volumes of traffic through the village.
- Problems of flooding, a regular occurrence resulting in closure of the bridge.
- Visual impact, particularly from the Monmouthshire and Brecon canal, and impact on tourism.
- Affect on the value of other properties in the village.
- Increased crime.

4 representations received in relation to CS/0198:

- Scale of development out of keeping with the village.
- Site separated from the main village.
- Prominent and sensitive rural location.
- Existing problems of flooding.

:

8 representations received in relation to PV11:

- Site large enough for more than 15 dwellings.
- Surface water drainage issues.
- Issues relating to safe access from B4269.
- Biodiversity value should be red in the Sustainability Assessment.
- Highway improvements would lead to the loss of a UK Priority Habitat and LBAP habitat.
- Site has TPOs on it.

## Candidate Site Analysis

### CS/0198

Due to the large scale of this site it was originally assessed as a potential Strategic Site at the Preferred Strategy Stage. The development of the whole of this site would be totally inappropriate for the scale of the village and therefore was not looked at any further as a Strategic Site. The Landscape Sensitivity and Capacity Study also identified the site as having low capacity for housing as it is located in the open countryside, contributes to the setting of the Brecon Beacons National Park and forms part of the rural approach to the settlement. There are also highway concerns as there is difficulty in obtaining pedestrian access to the main part of the village leading to a total reliance on the private motor vehicle.

### PV11

This site has been reduced further in size to minimise any impact on the designated TPO's at the site. Development would need to be carefully implemented into the surrounding landscape, although due to its small scale it



would not appear prominent. A satisfactory access can be provided to the site and there are good links with the core of the village.

**Council's Response:**

Llanellen is categorised as a Policy H3 settlement in the UDP and has a VDB. It is a reasonably sized settlement with a range of community facilities and very good bus links to Abergavenny. Dwr Cymru Welsh Water has not objected to the proposal. There are no Highway objections to the preferred site and no significant biodiversity issues have arisen. While there has been a substantial amount of affordable housing built recently in Llanfoist itself, rural needs are not necessarily being met and the selected provides an opportunity to do this. Currently there are 51 households on the waiting list in Llanfoist Fawr Community Council area, 23 from Llanfoist, 25 from Govilon and 3 from Llanellen itself.

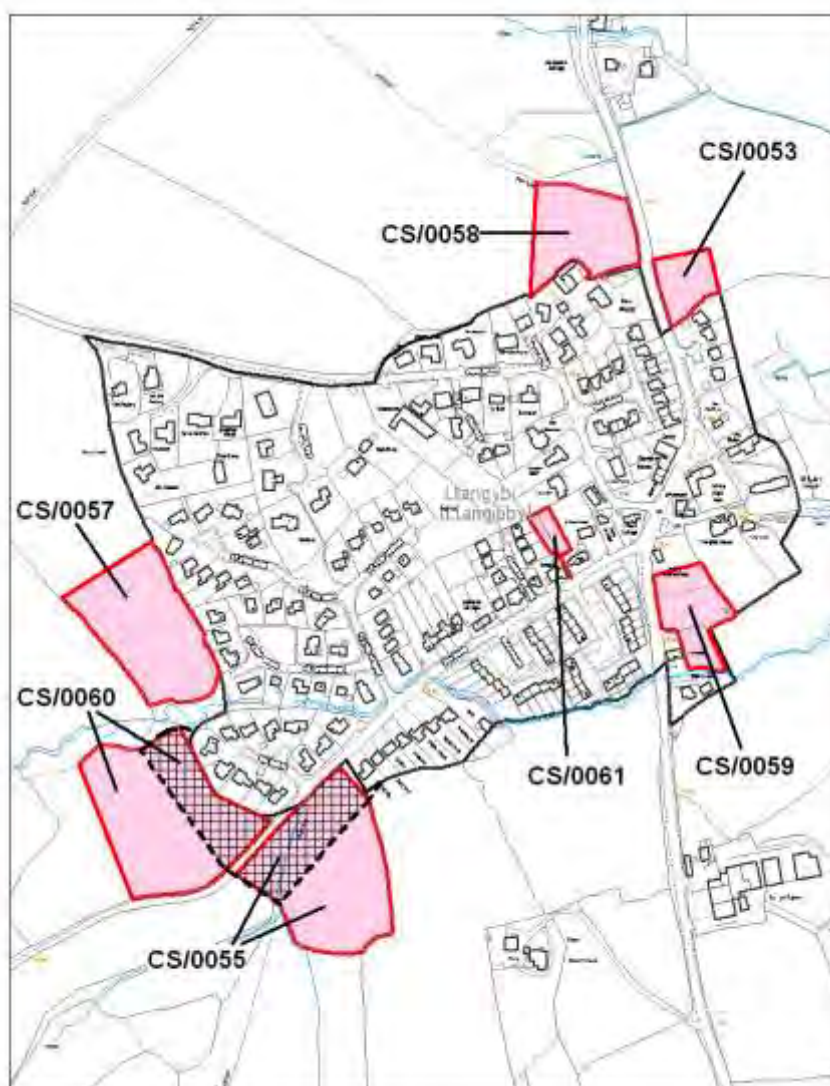
**Conclusion:**

Llanellen is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV11, Land to the north west of Llanellen, is allocated in the Deposit LDP for a maximum of 15 dwellings.



## 11. LLANGYBI



**46** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llangybi are summarised as follows:

GWT has no objection to the development of CS/0059 but concerns regarding retention and protection of features of biodiversity importance during development.

GWT has no objection to CS/0060 and CS/0061 but would expect protection and retention of mature trees and hedgerows and adjacent watercourses and protection of priority species in the development process.

GGAT commented that CS/0055 and CS/0060 have no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Hard to justify the allocation of CS/0055 and CS/0060 as no housing needs survey undertaken. Concerns about the deliverability of the sites contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)
- Unclear what part of CS/0055 and CS0060 are to be allocated.

Dwr Cymru Welsh Water has confirmed that sewerage and water facilities in the village are acceptable.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that development to the west of the village would not be well connected to the village.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to CS/0055 and CS/0060 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the sites acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to CS/0058 and CS/0053 due to the impact on 11\*house. Important that the farmhouse and barns still connect with fields and clear views from the road are maintained.

Llangybi Fawr Community Council submitted the following comments:

- Support in principle the attempts to provide affordable housing across the County, but question the stated need in the Community Council Area.
- Village has already experienced small, not always well-integrated pockets of quite costly housing.
- 18% of the village's housing stock is already affordable housing.
- Inadequate infrastructure.
- Western side of the village has problems with flooding and surface water drainage.
- Sewerage capacity.
- No mains gas.

The agent acting on behalf of the landowner of CS/0055 submitted supporting comments:

- The site is well related to the form of the village.
- The site scores well on the Sustainability Criteria.
- Built development can be accommodated on the site without undue harm to the landscape.
- The site can be accessed by a simple junction from Ton Road.

Studies relating to traffic impact and landscape have been submitted in support of proposed site CS/0055:

The landscape and visual assessment concludes that the site respects the existing settlement pattern in scale and location taking advantage of landform enclosure to the east and south, built form to the north and woodlands/strong

boundary hedgerows to the west. The overall view is that the impact would be minor to moderate adverse.

The Transportation Assessment proposes one new access to the site, it concludes that access can be accommodated off Ton Road, however, in order to achieve visibility in line with Manual for Street standards the 30mph speed limit would require relocation resulting in the requirement of a Traffic Regulation Order. The TA concludes that the proposed residential development would not have a significant impact on the immediate road network.

38 individuals submitted comments as follows:

1 representation received supporting, in principle, growth in the village on the grounds of support for existing facilities, and possible use of planning gain to improve infrastructure.

General Comments:

- Capacity of village infrastructure and amenities to accommodate further development.
- No mains gas.
- Problems of surface water drainage.
- Inadequate sewer/drainage system.
- Loss of biodiversity habitat.
- Impact on buildings of historical interest in the village.
- Increase in levels of noise and crime.
- 18% of the village's housing stock is already affordable housing.
- No up to date evidence of local need.

3 representations received in support of CS/0053:

- Within village boundary.
- Could be regarded as infill.
- Biodiversity low.
- Good access.
- Agricultural land poor.

17 representations received in relation to CS/0055:

- Outside the existing perimeter of village.
- Greenbelt land.
- Proximity to listed building.
- Loss of publicly accessible open space.
- Loss of agricultural land.
- Loss of habitat.
- Presence of UKBAP and LBAP Habitats.
- Access will compromise highway and pedestrian safety.
- Prone to surface water flooding.
- Loss of privacy to neighbouring houses.

5 representations received in relation to CS/0057:

- Outside the existing perimeter of village.
- Poor access.
- Prone to surface water flooding.
- Loss of view to neighbouring houses.

5 representations received in relation to CS/0058:

- Outside the existing perimeter of village.
- Poor access.
- Loss of habitat.
- Impact on views.
- Proximity to important historical building.

2 representations received in relation to CS/0059:

- Poor access would compromise highway and pedestrian safety.

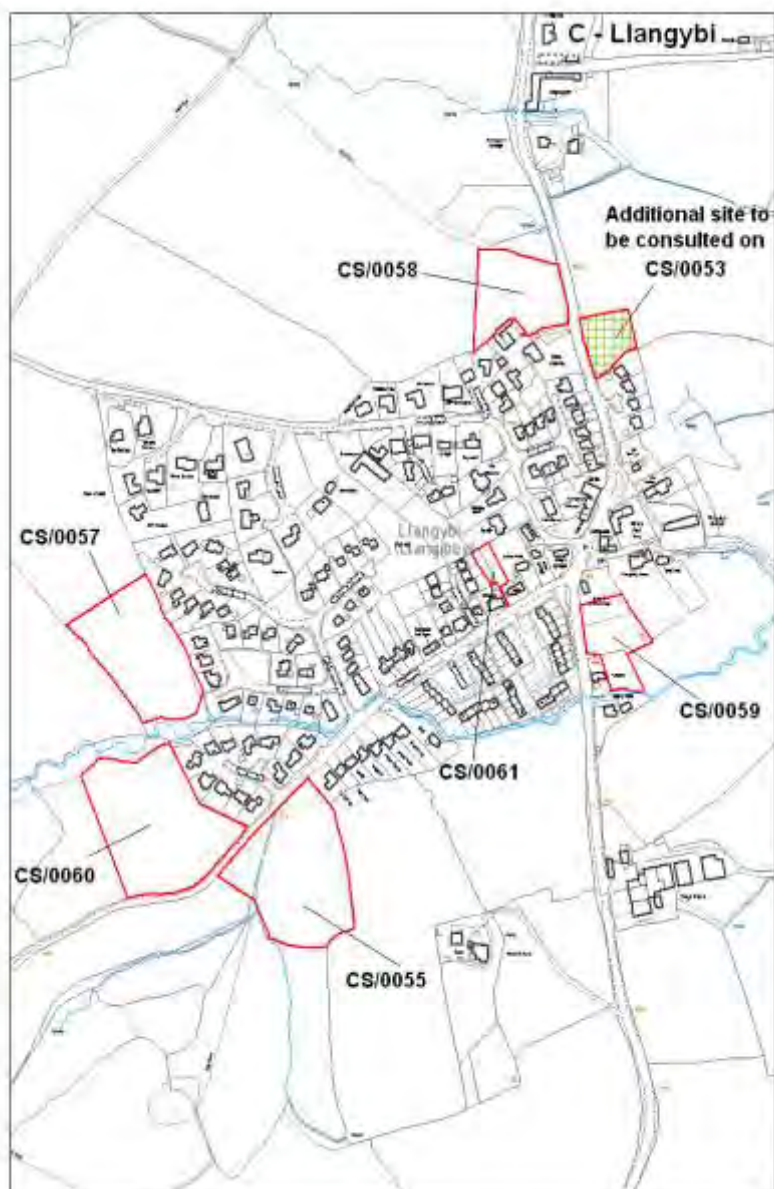
20 representations received in relation to CS/0060:

- Outside the existing perimeter of village.
- Greenbelt land.
- Designated SLA.
- Landscape sensitivity.
- Loss of habitat.
- Presence of UKBAP and LBAP Habitats.
- Japanese Knotweed present which if disturbed will spread.
- Loss of agricultural land.
- Loss of publicly accessible open space.
- Access will compromise highway and pedestrian safety.
- Prone to surface water flooding.
- Loss of privacy to neighbouring houses.
- Possible affect of development on 'Roman Road'.

3 representations received in relation to CS/0061:

- Could be regarded as infill.
- No proper access onto Ton road.

## Alternative Village Sites Consultation



**21** Representors submitted comments on the proposed alternative village site CS/0053 Land adj New House Farm.

The main issues raised in relation to Llangybi are summarised as follows:

GWT has no objection to the development of the site but would expect retention and protection of hedgerows during development.

CCW commented as follows:

- It is unclear whether CS/0053 Land adj New House Farm is to replace or be considered together with CS/0057 Rectory Field and CS/0060 Chapel Field, clarification is needed.

- The location of CS/0053 Land adj New House Farm represents an appropriate rounding-off opportunity subject to the provision of a landscape buffer to provide a firm defensible boundary to the settlement and mitigate any visual impact.

Llangybi Community Council re-affirmed their previously stated opposition to any further housing development in Llangybi. Stating that the village should not be classified as a main village and the Village Development Boundary should remain as it is:

- 22% of current housing stock is 'affordable'.
- Sewerage capacity.
- Problems of surface water drainage.
- No mains gas.
- Poor road infrastructure.

The agent acting on behalf of the promoters of CS/0055 Land at Ton Road submitted the following comments in relation to CS/0053 Land adj New House Farm:

- It is an open and exposed site on a busy road where a new vehicular access would be required.
- The site is probably in the area of medieval settlement and in close proximity to a Grade II Listed Building.
- Part of the site is located within a Sand and Gravel Mineral Safeguarding Zone.

The agent acting on behalf of the promoters of CS/055 Land at Ton Road submitted the following comments in support of the site:

- Site is well related to the urban form of Llangybi and respects the existing settlement pattern in scale and location.
- The site is virtually invisible from the south, only those houses immediately adjacent the site will be impacted.
- No pedestrian rights of way cross the site.
- A plan showing a proposed housing layout on the site was submitted along with a landscape strategy plan.

#### 17 individuals submitted comments as follows:

General comments:

- Clarification needed as to which sites are being put forward.
- Lack of local services and facilities.
- Poor road infrastructure.
- High percentage of current housing stock is affordable.
- Sewerage capacity.
- No mains gas.
- No proven local need.

7 representations received in relation to CS/0053 Land adj New House Farm:

- Visual impact on the entrance to the village.

- Proximity to a listed building.
- Increase in traffic.
- Problems of surface water flooding.

6 individuals commented that CS/0053 Land adj New House Farm would be the preferred site if development is required:

- Immediate access onto the main road.
- Would not increase surface water run-off on Ton Road.
- Represents rounding-off of the village.
- Flat site, less impact on neighbour amenity.

5 representations received in relation to CS/0055 Land at Ton Road:

- Loss of agricultural land.
- No current vehicular access.
- Loss of publicly accessible open space.
- Contain both European and UK protected species.
- Problems of surface water run-off.
- Potential contaminated land.
- Neighbours amenity.

5 representations received in relation to CS/0059 Newport Road:

- Within village boundary.
- Closer to village amenities

6 representations received in relation to CS/0060 Chapel Field:

- Loss of agricultural land.
- No current vehicular access.
- Loss of publicly accessible open space.
- Contains UKBAP and LBAP Habitats and Japanese Knotweed.
- In Special Landscape Area.
- Problems of surface water run-off.
- Potential contaminated land.
- Neighbours amenity.

Representations relating to the Candidate Site Assessment 'Traffic-Light' Matrices are considered further in **Appendix 1**.

## Candidate Site Analysis

### CS/0053

This site was not considered a preferred site at the Proposed Rural Housing Allocations stage; however was the subject of comment at the Final Informal Consultation stage to allow further investigation. The site is relatively compact in size however it is considered that it would be conspicuous in the approach to the village from the north. A satisfactory access can be provided to the site and there are good links to the core of the village however on balance its position and size render the site inappropriate for development.



#### CS/0055

Part of this site was put forward as a preferred site in the Proposed Rural Housing Allocations consultation. It is therefore not envisaged that the whole of this site is suitable for development. The site can be accessed, although if one access is considered appropriate the access could not be located opposite the existing access of The Chase. The development of the frontage of this site will enable the continuation of the building line of the adjoining houses to the east and would enable limited extension of the village in a less conspicuous area.

#### CS/0057

This site is constrained in access terms as it appears to be landlocked. It would not be particularly well connected to the village and due to its lack of access is considered inappropriate for development.

#### CS/0058

The development of this site would appear prominent in the rural approach to the village, it would not provide a rounding off of the settlement. This site is located in the sensitive setting of New House a Grade II\* listed building and it is therefore considered inappropriate for development.

#### CS/0059

This site is located within the existing Village Development Boundary (VDB) and therefore could be dealt with under existing Unitary Development Plan policies subject to detailed considerations including provision of access, which is the subject of a current planning application. The site is not included as an allocation within the LDP, however its position within the VDB will remain.

#### CS/0060

Part of this site was put forward as a potential site in the Proposed Rural Housing Allocations consultation. It is therefore not envisaged that the whole of this site is suitable for development. The site can be accessed; although the boundary line would need to be set back to provide sufficient visibility splays should the site be developed. It is not considered appropriate to have a large residential extension to the village and on balance CS/0055 allows a better opportunity for development in access terms and in landscape terms through continuation of the current building line to the east of the site.

#### CS/0061

This site is located within the existing Village Development Boundary; it therefore could be dealt with under existing Unitary Development Plan policies subject to detailed considerations, including provision of access. The site is of such a small scale it is not considered appropriate to be included as an allocation in the LDP, the site will be able to be assessed using Development Management policies.

### **Clarification of Landscape Assessment**

There was an error in the Proposed Rural Housing Allocations Consultation Draft in that candidate sites CS/0055 and CS/0066 were stated as being in a



landscape character area with medium capacity. In fact, both sites are in areas with medium/low capacity, although the lower slopes on which the sites are located are less conspicuous in the landscape than the higher ground.

#### **Council's Response:**

Llangybi is well served by community facilities and public transport and a number of development opportunities have come forward. The evidence points to a widespread need for affordable housing in Monmouthshire and a need for 18 affordable dwellings in the Llangybi Community Council area was established in the Welsh Rural Housing Enabler Study. Dwr Cymru Welsh Water has not objected to the proposed development. The proposals have been reduced in size since the original consultation. There are no Highway objections to the preferred site and no significant biodiversity issues have arisen.

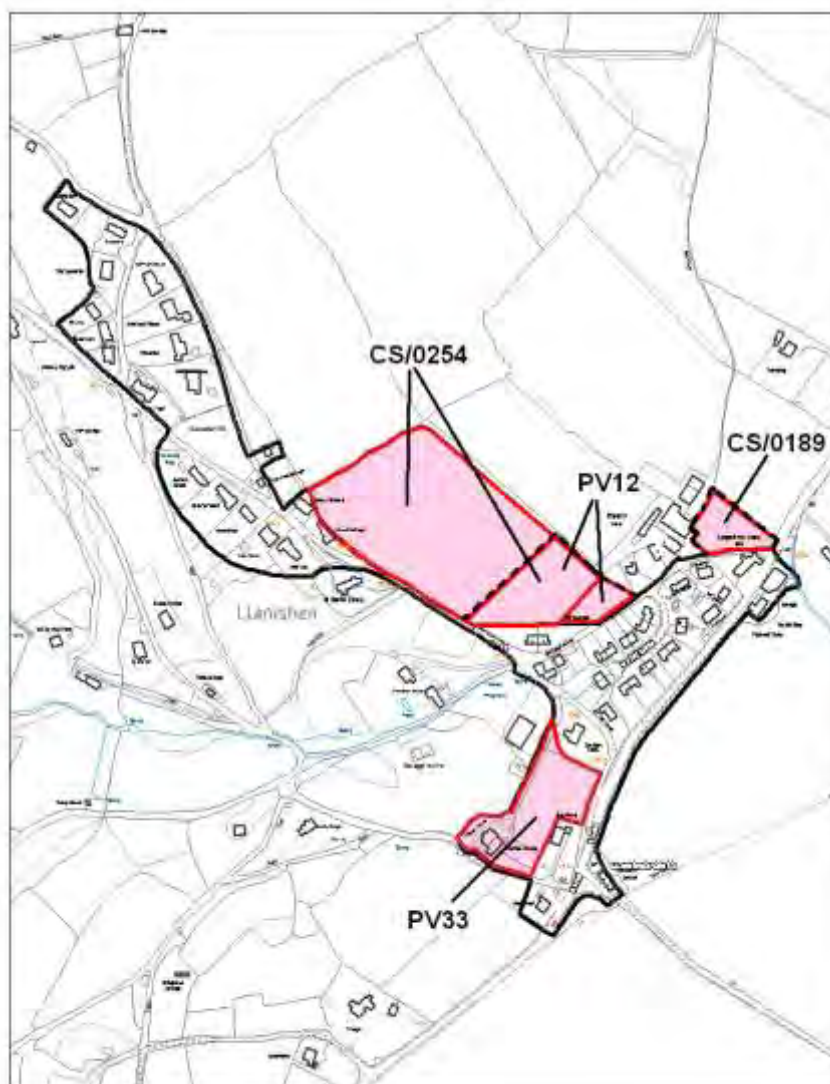
#### **Conclusion:**

Llangybi is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/055 Land at Ton Road, immediately adjacent the settlement is allocated in the Deposit LDP for a maximum of 10 dwellings.

The VDB is reaffirmed with an amendment to include the new housing allocation.

## 12. LLANISHEN



**15** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llanishen are summarised as follows:

GWT has no objection to PV12 and CS/0189 but would expect protection and retention of mature trees and hedgerows and protection of priority species in the development process.

GGAT made the following comments:

- No objection to PV12 but archaeological evaluation needed prior to planning permission.
- CS/060 has no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Village is within AONB and allocation exceeds identified housing need for the Community Council area. Possible conflict with national policy and legislation relating to AONBs, thus proposal fails to meet Test of Soundness C2.
- Any development of PV12 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

WVAONB commented that development of PV12 and CS/0189 would be acceptable provided a detailed landscape proposal is included in any scheme.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities as being acceptable.

The Biodiversity and Ecology Officer for Monmouthshire County Council recommends that PV33 be removed from the VDB as it has been identified as SINC quality. Further ecological assessment will be necessary for PV12, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Trellech Community Council submitted the following comments:

- Building on Greenfield sites is unwelcome.
- Lack of infrastructure and services in villages.
- Poor access to the preferred site.

The agent acting on behalf of the promoter of CS/0189 submitted supporting comments:

- Site is available for development.
- Safe access.
- Well related to the existing settlement.

The agent acting on behalf of the tenant farming PV12 submitted the following comments:

- Land is important to the economic viability and animal welfare of a working farm.
- Land acts as a buffer between Llanishen and a working farm.

1 individual submitted comments in support of an alternative site adjacent the B4293:

- Direct access off the B4293.
- Less visual impact.
- In keeping with existing linear development of the village.

7 individuals submitted comments as follows:

1 representation received in support of proposed rural housing allocations in Llanishen.

1 representation received asking for land to be included in the VDB.

General Comments:

- Limited facilities.
- Poor access.

2 representations received in relation to PV12:

- Poor access.
- Agricultural land.

1 representation received in relation to PV33:

- High biodiversity value and SINCE status.

1 representation received in relation to CS/0189:

- Agricultural land.

1 representation received in relation to CS/0254:

- Agricultural land.

## Candidate Site Analysis

### CS/0189

The site to the rear of the Carpenters Arms is small in size and would provide an opportunity of rounding off the settlement in this direction. The site can be accessed easily and would not appear intrusive in the surrounding landscape due to its well screened boundary and position between the public house and adjacent farm buildings.

### CS/0254

The development of the whole of this site would be out of scale and character with the village due its significant size in comparison. There would also be difficulties with respect of highway access. A development of this scale would have an unsatisfactory impact on the wider landscape of the Wye Valley Area of Outstanding Natural Beauty.

### PV12

This small portion of the south eastern corner of CS/0254 is considered to be suitable for a maximum of 5 dwellings adjacent 1 Church Road and Penarth Farm, having a considerably less impact than the larger site of which it is part.

### PV33

This site is located within the existing Village Development Boundary and therefore could be dealt with under existing Unitary Development Plan policies subject to detailed considerations. The site has subsequently been identified as a SINCE, a local site of biodiversity interest Given its existing allocation as a housing site in the UDP and suitability in landscape terms (as assessed by the UDP Inspector) it is considered that the site should remain in the Village Development Boundary but not specifically allocated for housing as there does not appear to be a good prospect of the site being developed within a reasonable timescale.

**Council's Response:**

The UDP Inspector noted that, while Llanishen was a small village, it possessed some basic facilities, including a public house and a shop within the petrol filling station. There was also a bus service along the B4293. Accordingly, he considered it to be a settlement where limited housing development might be acceptable and that it was reasonable to categorise it as a H3 settlement. The two small sites identified are considered to be capable of making a useful contribution to meeting local needs for affordable housing without any adverse impacts on landscape, highway safety and biodiversity interests.

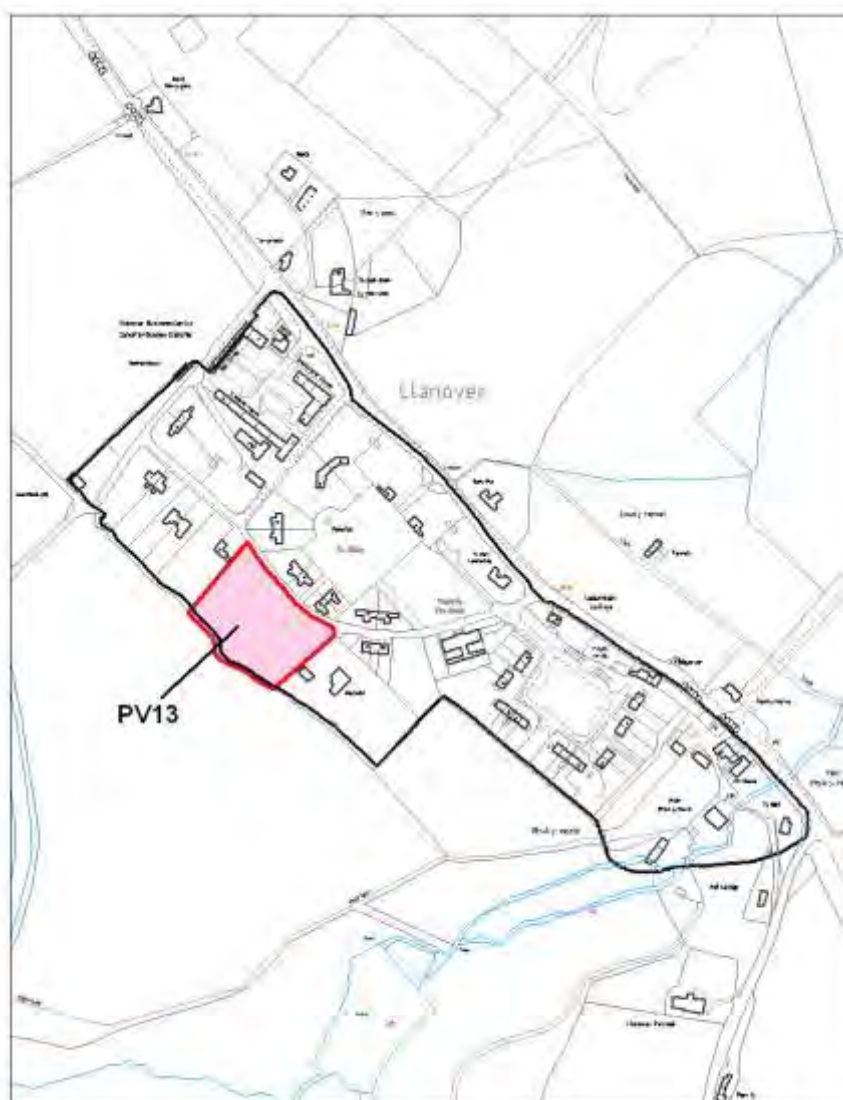
**Conclusion:**

Llanishen is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV12, Land adjacent Church Road, is allocated in the Deposit LDP for a maximum of 5 dwellings.

CS/0189, Land to the rear of the Carpenters Arms, is allocated in the Deposit LDP for a maximum of 5 dwellings.

### 13. LLANOVER



**2** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

Llanover Community Council approve the inclusion of PV13, however the Council reserves its position with regard to density as no figure for the number of houses is given in the Consultation Draft Report. Other sites put forward by the Rural Housing Enabler should be considered.

Llanover Estate confirmed that there were no foreseeable plans to bring forward site PV13 for housing development and that it has no other areas of land within the village or adjacent to it that they wish to promote for residential at the present time.

**Council's Response:**

Llanover is a small village but has a reasonable range of community facilities, including an employment estate, and has good public transport links. It is currently a H3 village in the UDP and has a VDB. Given its sensitive conservation area status, however, and the apparent lack of interest of the main landowner, Llanover Estates, in bringing land forward for housing development, it is not considered appropriate to designate it as a Main Village in the LDP.

**Conclusion:**

Llanover, under Policy S1 of the Deposit LDP, is designated as a Minor Village where small scale residential development will be allowed subject to LDP Policy H3.



## 14. LLANVAIR DISCOED



**75** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llanvair Discoed are summarised as follows:

GWT has no objection to PV16 but would expect protection and retention of hedgerows and adjacent watercourses and protection of priority species in the development process.

GGAT commented that PV16 has no known archaeological restraints. No reason for not allocating.

Dwr Cymru Welsh Water has advised that there are no public sewers in the village.

The Principal Landscape & Countryside Officer for Monmouthshire County Council made the following comments:

- PV16 is of low capacity for development and thus it would be inconsistent to allocate it.
- Redrawing of the village development boundary should consider not incorporating PV14 which is the most sensitive allocation and forms the back drop to the village and its setting.



The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV16 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to PV15, there would be an unacceptable impact on the listed barn.

Caerwent Community Council submitted the following comments:

- Capacity of settlement to accommodate proposed scale of development.
- Poor access.
- Lack of infrastructure and services.
- No mains gas or sewerage.
- Problems of flooding.

69 individuals submitted comments as follows:

General comments:

- Scale of development.
- Poor access to village.
- Insufficient infrastructure or amenities to support further housing.
- Problems of continuity of electricity supply and broadband speed.
- No mains gas, sewerage or drainage.
- Poor water pressure.
- Environmental impact, village is within EA groundwater special protection zone.
- Loss of agricultural land.
- Impact on biodiversity.
- Need for affordable housing in Community Council area already provided for by development in Caerwent.
- Village has already experienced recent in-fill development.
- Problems of flooding and surface water drainage.

22 representations received in relation to PV14:

- Outside current village boundary.
- In SLA.
- Poor access.
- Highly visible.
- Adjacent a listed building.
- Possible site of archaeological interest.
- Impact on biodiversity.
- Problems of flooding and surface water drainage.
- Loss of privacy to neighbouring houses.

21 representations received in relation to PV15:

- Outside current village boundary,
- Adjacent a listed building.
- Possible site of archaeological interest.

- Poor access.
- Highly visible.
- Impact on biodiversity.
- Problems of flooding and surface water drainage.
- Loss of privacy to neighbouring houses.

29 representations received in relation to PV16:

- Outside current village boundary.
- Highly visible
- Poor access.
- Grade 2 agricultural land.
- Impact on biodiversity.
- Problems of flooding and surface water drainage.
- Loss of privacy to neighbouring houses.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Llanvair Discoed:

General comments:

- Should not be classed as a main village.
- No mains drainage or mains gas supply.
- Lack of local services.
- Poor access to the village.
- Problems of surface water drainage.

#### **PV14 Land rear of School Court**

2 individuals submitted comments in relation to PV14:

- Problems of surface water drainage.
- No mains drainage.
- Poor access.
- Currently within designated Special Landscape Area.
- Possible presence of protected species.
- Possible site of medieval settlement.
- Adjacent Grade II listed barn and close to the castle
- Discrepancies in the traffic light assessment.

#### **PV15 Land south of Llanvair Discoed**

2 individuals submitted comments in relation to PV15:

- Very visible from the south and east.
- Problems of surface water drainage.
- Poor access.
- No mains drainage.
- Possible presence of protected species.
- Close to a designated Special Landscape Area.
- Possible site of medieval settlement.

## **PV16 Land to the south east of Llanvair Discoed**

The Environment Agency commented that the site is within the Great Spring Source Protection Zone 1, as such sewerage infrastructure is a significant issue because of the sensitive nature of groundwater and the pollution risks posed by inadequate sewerage infrastructure.

2 individuals submitted comments in relation to PV16:

- Visible from the south and east
- Poor access.
- Problems of surface water drainage.
- No mains drainage.
- Possible presence of protected species.
- Close to a designated Special Landscape Area.
- Close to listed buildings.

### **Council's Response:**

Llanvair Discoed is currently a H4 infill village in the UDP. It is a relatively small village with limited public transport access but it does have a range of community facilities. Nevertheless, there are no foul sewerage disposal facilities in the village and alternative methods of drainage are not suitable for any substantial development because it is within the Great Spring Source Protection Zone 1. No candidate site analysis is provided, therefore, because the village is considered, in principle, unsuitable for designation as a Main Village.

### **Conclusion:**

Llanvair Discoed, under Policy S1 of the Deposit LDP, is to be designated as a Minor Village where small scale residential development will be allowed subject to LDP Policy H3.

## 15. LLANVAIR KILGEDDIN



**37** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llanfair Kilgeddin are summarised as follows:

GWT has no objection to PV17 but would expect protection and retention of hedgerows and protection of priority species in the development process.

GGAT commented that PV17 has no known archaeological restraints. No reason for not allocating.

CCW commented that it is hard to justify the allocation of PV17 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)

Dwr Cymru Welsh Water confirmed sewerage and water facilities in the village as being acceptable.

Llanover Community Council does not object to the development of PV17, but access is poor. A development of 4-6 houses would be acceptable on part of the site. CS/0194 is a possible site but a development of up to 15 houses would be too big for the village. Other sites put forward by the Rural Housing Enabler should be considered.

The landowner of PV17 submitted the following supporting comment:

- Road access can be achieved directly off the B4598 avoiding extra traffic through the village.

The landowner of PV17 submitted comments in support of an alternative site to the east of the B4598:

- Good traffic access.
- Minimal visual impact.
- Sewerage works on landowners land.

The agent acting on behalf of the landowner of CS/0194 submitted the following comment:

- Scale of proposed development too great. Two additional dwellings on both CS/0194 and PV17 would more easily be absorbed into the village.

31 individuals submitted comments as follows:

General comments:

- Capacity of settlement to accommodate proposed scale of development.
- Insufficient infrastructure or amenities.
- No mains gas.
- Sewerage capacity.
- Insufficient evidence of local need.

2 representations received commending the proposed development of affordable housing, but at a much smaller scale.

28 representations received in relation to PV17:

- Poor access.
- Noise pollution during construction.
- Greenfield site, currently designated as Special Landscape Area.
- Question the grading of the land as Grade 3/4.
- Existing problems of surface water drainage and flooding, particularly the lower section of the site.
- Impact on biodiversity.
- TPOs on the site.
- If problems overcome could accommodate a maximum of six dwellings.

6 representations received in relation to CS/0194:

- Poor access.
- Problems of surface water drainage and flooding.
- If problems overcome could accommodate three or four dwellings.

## Candidate Site Analysis

### CS/0194

This site is currently partly occupied by two dwellings with the rest being part of an agricultural field. In highway terms it is suggested that frontage accesses to the site could only accommodate one or two dwellings, the proximity of bends to the site would preclude a new junction. This site is not considered appropriate for development, the development of the reduced site at PV17 would provide sufficient land to meet the required housing need in Llanvair Kilgeddin and there is therefore no requirement for approximately two additional dwellings at this site, which is all that could be accommodated in highway terms.

### PV17

This site has been reduced further in size to minimise any impact on the surrounding landscape, the proposed allocation has been reduced to a maximum of 5 dwellings. Development would need to be carefully designed to ensure a satisfactory access can be provided to the site using the turning head at Gethin Place as an access point. Car parking facilities for existing residents of Gethin Place should be provided within the site boundary to ease any existing pressures on the road network.

### **Council's Response:**

The village is marginal in terms of its „sustainability“, having a small population size, limited facilities and poor access to public transport. At the same time, however, local need is high and there is an existing school in the village that is worthy of support and obviously has sustainability benefits for existing residents. The views of the Community Council are agreed with, however, and the size of the development has been reduced to 5 dwellings.

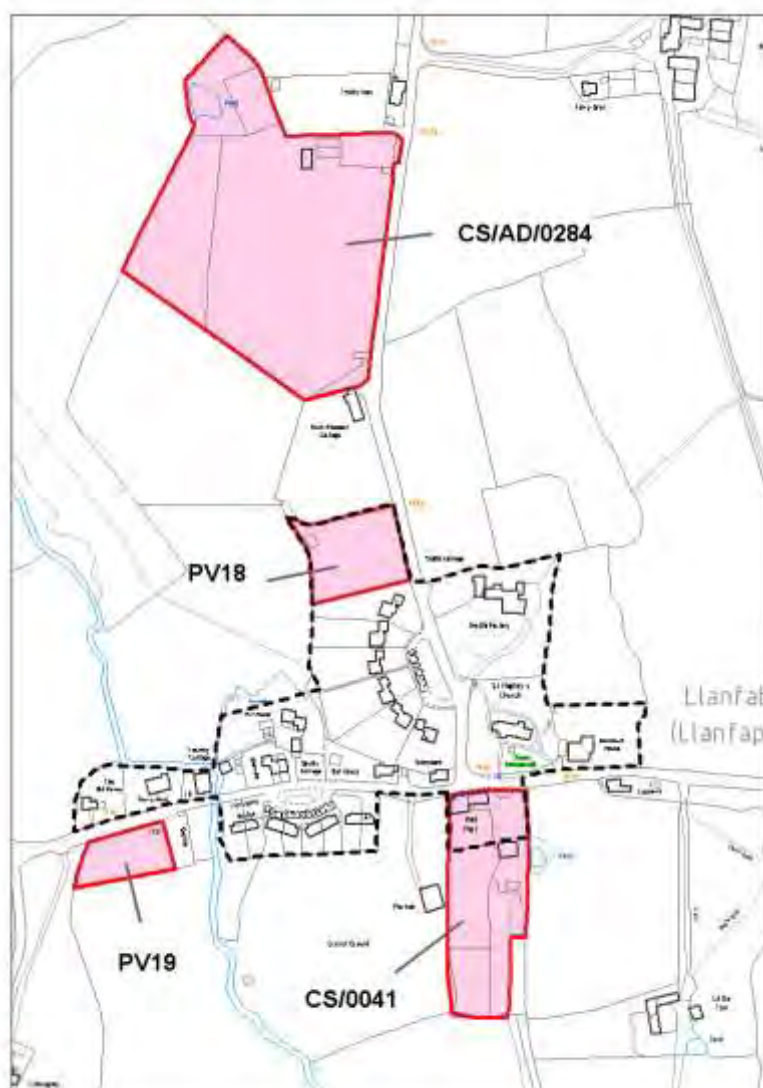
### **Conclusion:**

Llanvair Kilgeddin is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV17, Land to the north of Llanvair Kilgeddin, immediately adjacent the settlement, is allocated in the Deposit LDP for a maximum of 5 dwellings.

A VDB is drawn around the existing development with an extension to incorporate the above housing allocation

## 16. LLANVAPLEY



**18** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Llanvapley are summarised as follows:

GWT has no objection to PV18 but would expect protection and retention of hedgerows and trees and protection of priority species in the development process.

GGAT commented that PV18 has no known archaeological restraints. No reason for not allocating.

CCW commented that any development of PV18 should make provision for the protection of existing landscape and ecological features and minimise potential impacts on biodiversity.

Dwr Cymru Welsh Water confirmed sewerage facilities in the village as being acceptable. PV18, however, was identified as being at a height where mains water cannot be guaranteed at all times.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV18 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to CS/0041 due to the potential impact on the setting of the listed church and not in line with the linear development of the settlement.

Llanarth Fawr Community Council submitted the following comments:

- No overall objection to a small development on a suitable site.
- PV18 would be an acceptable site provided that there were access improvements.
- Object to CS/0041 as poor access and not in keeping with the village layout.
- Object to CS/AD/0284 as is an elevated position and so highly visible. Also poor access.

The owners of PV18 have stated that they do not wish their land to be considered for development.

The owners of PV19 have stated that they do not wish their land to be considered for development.

One representation queries whether the site boundaries to AD/0284 are correct.

#### 11 individuals submitted comments as follows:

##### General comments:

- Capacity of settlement to accommodate proposed scale of development.
- Few local facilities and services.
- No mains sewerage or gas.
- Inadequate water supply.
- Problems of continuity of electricity supply and broadband speed.
- Too high a % of affordable housing.

##### 6 representations received in relation to PV18:

- Constitutes ribbon development.
- Highly visible.
- Poor access.
- Ecological and environmental impact.
- Affect amenity of neighbouring properties.



1 representation received in relation to PV19:

- Prone to flooding.

4 representations received in relation to CS/0041:

- Outside village boundary.
- Route of public right of way.
- Sloping site, development could cause problems of run-off and erosion.
- Status of land as car park for the public house should be maintained.
- Proximity of land to listed buildings.

4 representations received in relation to CS/AD/0284:

- Outside village boundary.
- Detrimental to the character of the village.
- Highly visible in the landscape.
- Poor access.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Lilanvetherine:

1 individual submitted comments in relation to CS/0041:

- The Red Hart is referred to as a public house, it is by definition and use a dwelling house.
- Redevelopment of the site would allow for improved access onto the B4233 and provide between 10 and 12 houses.

### Candidate Site Analysis

#### CS/0041

Development of this site would not relate well to the village form of Llanvapley, most especially as frontage development is prevalent in any existing residential development to the south of the B4233 within the village. It is likely that access could be achieved at the site however the impact on the surrounding landscape and village form would not be appropriate. Also, there would be possible issues regarding conflict with access and parking for the public house, which, although not in use, has an existing use as a public house rather than a dwelling on the ground floor.

#### CS/AD/0284

This site is detached from the settlement on rising ground to the north of the village. It is not considered appropriate for development.

#### PV18

This site was considered to offer the best prospect for development within Llanvapley, access can be provided to the site although the hedgerow fronting the site has biodiversity interest providing a potential barrier for development. The landowners of this site have however stated they do not wish to put it forward for development.

PV19

Part of this site is located in Zone C2 floodplain and would therefore not be appropriate for a residential use. The landowners of the site have also stated that they do not wish the site be considered for development.

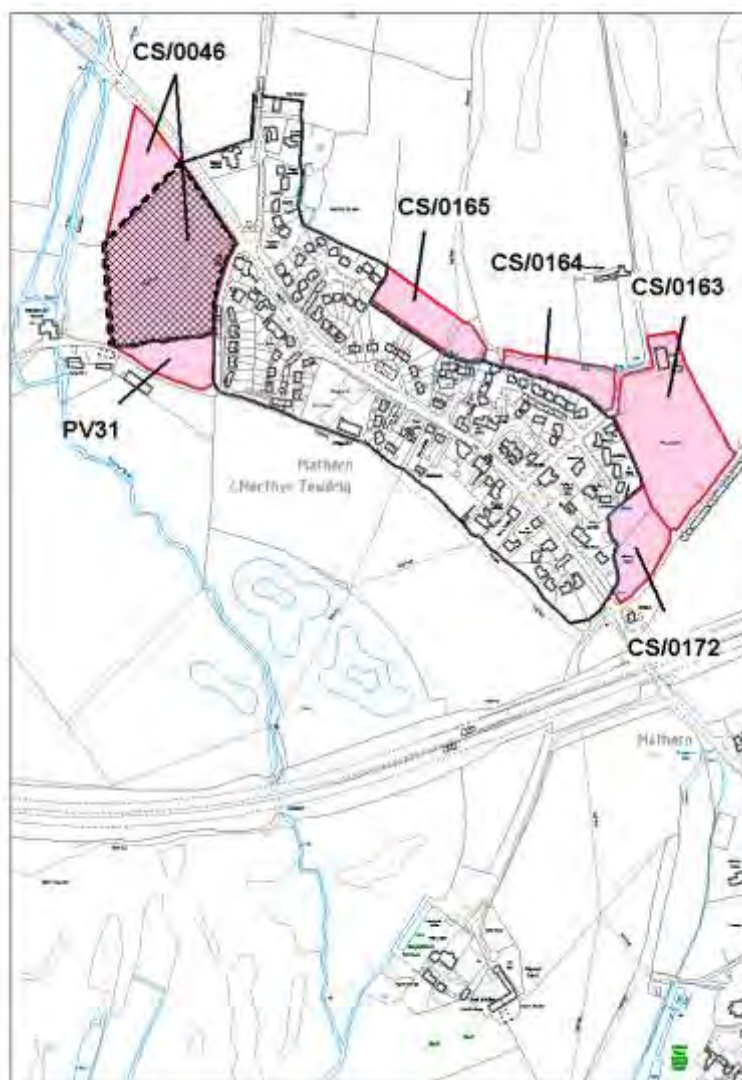
**Council's Response:**

Llanvapley is a small settlement with limited community facilities and a lack of public transport opportunities. Its sustainability is extremely marginal, therefore, and as no suitable development site has come forward it is considered that it should not be designated as Main Village.

**Conclusion:**

Llanvapley, under Policy S1 of the Deposit LDP, is designated as a Minor Village where small scale residential development will be allowed subject to LDP Policy H3.

## 17. MATHERN



**40** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Mathern are summarised as follows:

GWT has no objection to CS/0046 but would expect protection and retention of hedgerows and adjacent woodland and stream and protection of priority species in the development process.

GGAT commented that CS/0046 has no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Hard to justify the allocation of CS/0046 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6

(para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)

- Unclear what part of CS/0046 is to be allocated.

Dwr Cymru Welsh Water confirmed sewerage and water facilities in the village as being acceptable.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV31 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Mathern Community Council submitted the following comments:

- Site is large, not sufficient infrastructure capacity to support a significant development.
- Visual impact on the village.
- Site is on the edge of the Conservation Area.

The agent acting on behalf of the landowner of CS/0172 submitted supporting comments:

- The site is well related to the existing built up area.
- The site is located in close proximity to a range of services.
- No biodiversity constraints.

The agent acting on behalf of the landowner of CS/0163, CS/0164 and CS/0165 submitted supporting comments:

- The sites are well related to the existing built area.
- The impact on the Historic Park would be minimal as would be viewed against the back drop of existing residential development.

### 33 individuals submitted comments as follows:

10 individuals submitted comments in support of the inclusion of CS/0046:

- Represents a rounding off of the village.
- Would meet the need for affordable housing for local people.
- Village well placed in terms of services and facilities, further development will support these.
- Landscape and historical aspects of the area would not be compromised by a sensitive development of the site.
- The site is well drained.

1 individual submitted comments in support of CS/0164 and CS/0165 on the grounds that the sites are capable of sensitive development.

1 individual submitted comments in support of CS/0163:

- The site is within the natural footprint of the village.
- Development of the site would improve access to Chepstow.

General Comments:

- The villages of Pwllmeyric and Mathern are very much a combined community their need for affordable housing should be considered together not separately.
- Affordable housing must be for local people.
- Capacity of village infrastructure and services to absorb additional housing.
- Capacity of the sewerage and drainage system.
- Problem of continuity of electricity supply.
- Increase in road traffic on A48 and approach to the High Beech roundabout.

1 representation received in relation to PV31:

- Ecological and biodiversity issues.

19 representations received in relation to CS/0046:

- Adverse impact on the approach into the historic village.
- Greenfield development.
- Would extend the linear settlement pattern resulting in ribbon development.
- Would reduce the green belt between Mathern and the A48.
- Size of site, too large for number of houses proposed.
- Proximity to listed building.
- Problems of surface water drainage.
- Loss of public amenity.
- Loss of agricultural land.
- Affect on biodiversity.

1 representation received in relation to CS/0163:

- Highly visible.
- Recreation area.

1 representation received in relation to CS/0164:

- Impact on biodiversity.
- Problems of surface water drainage.

2 representations received in relation to CS/0165:

- Poor access.
- Impact on biodiversity.
- Problems of surface water drainage.

## Candidate Site Analysis

### CS/0046

This site is located adjacent the approach to Mathern from the north west. Development would extend the village into the least sensitive area in terms of landscape and historic designations and is also located away from the Mathern Conservation Area. It is located in a landscape character area identified as having a medium capacity for housing. The site should, however, be designed to a high quality to provide a positive edge to the settlement in

this location. It has been substantially reduced in size to accommodate 15 dwellings only. The site is considered as low value in terms of biodiversity and can be accessed easily both by car and pedestrians, it has good links to the core of the village and is within walking distance to nearby facilities adjacent the A48 at Pwllmeyric.

#### CS/0163

This site is located within a sensitive location in the south eastern corner of the village and would create a significant visual intrusion into the rural approach to Mathern along Mathern Road. The site is located within the Mathern Conservation Area, a small portion is located within the Wyelands Historic Park and Garden and the remainder is located in the essential setting. The site is currently used as playing fields and includes Mathern Athletic Club House a community facility, it is also designated as Amenity Open Space. The significant impact on the landscape and historic environment is considered to outweigh any proposed development in this location.

#### CS/0164

There are highway issues in relation to this site; it is unlikely a sufficient access could be achieved to support the site. The site is located within the Mathern Conservation Area and is close to the Wyelands Historic Park and Garden; it has also recently been designated as a SINC. The significant impact on the landscape and historic environment is considered to outweigh any proposed development in this location.

#### CS/0165

There are highway issues in relation to this site as the site appears to be landlocked due to the location of driveways and gardens at the adjacent Wyelands View; it is unlikely a sufficient access could be achieved to support the site. The site is located within the Mathern Conservation Area, is close to the Wyelands Historic Park and Garden and located within the Essential Setting. The significant impact on the landscape and historic environment combined with access issues is considered to outweigh any proposed development in this location.

#### CS/0172

There are highway concerns in relation to this site; it is not likely that an access could be provided to the site. The site is located within the Mathern Conservation Area and is close to the Wyelands Historic Park and Garden; it is also designated as Amenity Open Space. The significant impact on the landscape and historic environment combined with access issues is considered to outweigh any proposed development in this location.

#### PV31

This small site is located immediately adjacent CS/0046 and could have potentially provided a rationalisation of the proposed site. The owners of this land have however stated since it was put forward that they do not wish the site to be considered for development.

**Council's Response:**

Mathern is relatively large village with a good range of facilities and good access to Chepstow and to public transport (albeit that most bus services involve a short walk to the A48). The village has an extremely sensitive conservation and landscape setting but an opportunity for development exists that would extend the village away from these designations. Mathern is currently a H3 village in the UDP and has a VDB. The evidence points to a widespread need for affordable housing in the rural parts of Monmouthshire and a need for 20 affordable dwellings in the Mathern Community Council area was established in the Welsh Rural Housing Enabler Study. (An earlier local housing needs survey in 2005 identified 13 households in need).

**Conclusion:**

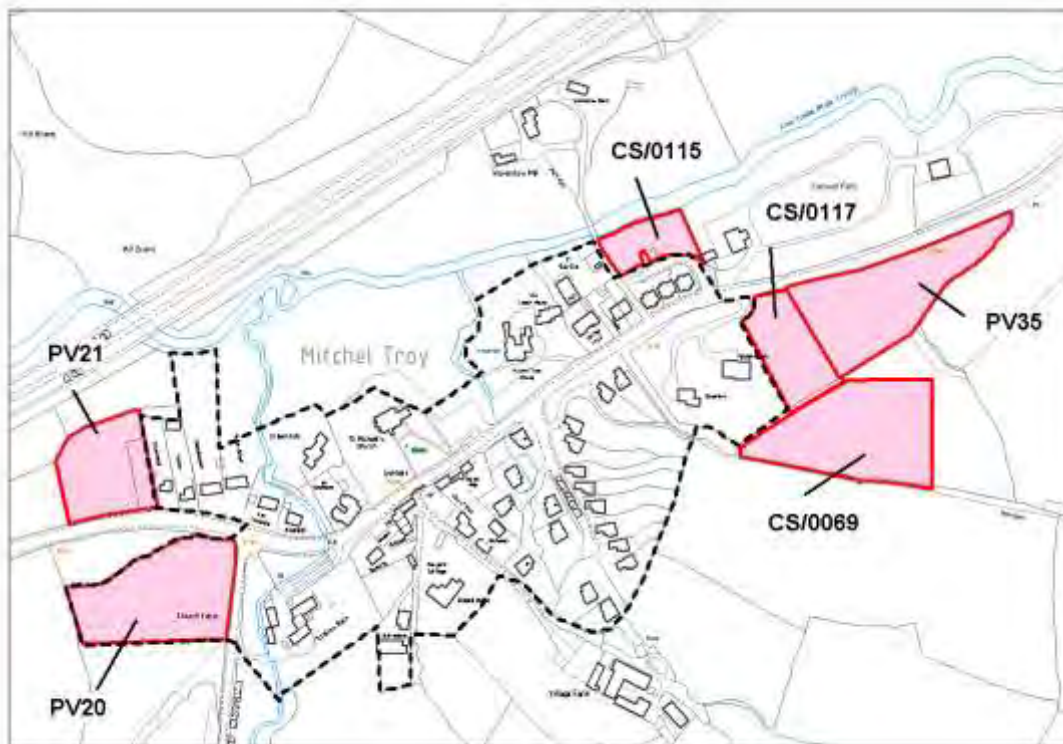
Mathern is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/0046, Land to the west of Mathern, is allocated in the Deposit LDP for a maximum of 15 dwellings.

The VDB is reaffirmed, subject to an amendment to incorporate the new housing allocation.



## 18. MITCHEL TROY



**19** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Mitchel Troy are summarised as follows:

GWT has no objection to PV20 but would expect protection and retention of woodland and any trees and protection of priority species in the development process.

GGAT commented that PV20 has no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Any development of PV20 should make provision for the protection of existing landscape and ecological features and minimise potential impacts on biodiversity.
- Size of allocation will extend linear/ribbon nature of the village. Proposed allocation appears to conflict with national planning policy objectives to minimize need to travel (PPW, para. 4.6.4) More appropriate to allocate housing in Monmouth.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities in the village as being acceptable.



The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV20 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The landowner of CS/0069 submitted comments in support of the site:

- Site abuts the existing village development boundary.
- Level site with safe access.
- A buffer could be placed between the site and Longstone Wood to protect biodiversity.
- Existing hedgerows shield site from view and protect neighbour amenity.
- Uneconomic to use the site for agricultural use.
- Local need for low cost affordable housing in the Community Council area.

A supporting statement was also put forward in relation to the following; location and description, historical planning background, highways - including a plan showing proposed highways access, adjacent land – relationship to other candidate sites and village development boundary, ecology, prominence of the site, excavation and amenity, rural housing and photographic evidence.

The Landowner of PV35 submitted comments in support of the site:

- Site is in close proximity to the existing village development boundary.
- Safe access to site.
- A buffer could be placed between the site and Longstone Wood to protect biodiversity.
- Appropriate landscaping and design would reduce visual impact.
- Local need for low cost affordable housing in the Community Council area.

A supporting statement was also put forward in relation to the following; location and description, historical planning background, highways - including a plan showing proposed highways access, adjacent land – relationship to other candidate sites and village development boundary, ecology, prominence of the site, excavation and amenity, rural housing and photographic evidence.

The owners of site PV20 have stated that they have no wish to sell the land.

The owners of land at the Sawmill, Highway Farm have put forward their site to be considered for development.

#### 14 individuals submitted comments as follows:

##### General comments:

- Insufficient infrastructure or amenities.
- Too large a development for size of village.

##### 7 representations received in relation to PV20:

- New woodland created under Woodlands for Wales initiative.
- Impact on habitat.
- Elevated, steeply sloping site.
- Poor access.

- Issues of flooding and surface water drainage.
- Isolated from the village.

5 representations received in relation to PV21:

- Would extend the village beyond its natural boundary.
- Greenfield site.
- Provides entrance to village.
- Highly visible from the surrounding area.
- Loss of agricultural land.
- Issues of flooding and surface water drainage.
- Impact on biodiversity.
- Poor access.
- Increase in traffic.
- Air, light and noise pollution from A40.
- Impact on amenity of neighbouring house.

3 representations received in relation to PV35:

- Within the AONB.
- Greenfield site.
- Loss of agricultural land.
- Adjacent ancient woodland designated for biodiversity importance.
- Highly visible sloping site.
- Public footpath crosses the site.
- Poor access.
- Issues of flooding and surface water drainage.

1 representation received in relation to CS/0069:

- Isolated without development of neighbouring sites.
- Public footpath crosses the site.
- Right of Easement for mains water for Longstone Farm goes through the middle of the site.

1 representation received in relation to CS/0117:

- Not suitable for proposed number of houses as poor access.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Mitchel Troy:

#### CS/0069 Land adjacent Greenacres & Brambles

2 individuals submitted comments in relation to CS/0069:

- Poor access.

#### CS/0117 Curtilage of Greenacres

2 individuals submitted comments in relation to CS/0117:

- Traffic light assessment classes the site as agricultural land, but has been part of the garden of Greenacres for 30 years.

- Development would be for one dwelling only..

#### PV20 Land adjacent Common Road

1 individual submitted comments in relation to PV20:

- The site is new woodland created under the Woodlands for Wales initiative.
- The Forestry Commission should be consulted.

#### PV35 Site at Mitchel Troy

2 individuals submitted comments in relation to PV35:

- Traffic light assessment states that site is approximately 40m from Longstone Wood SINC. The site actually abuts the wood at its northern boundary.
- The wood is a habitat site for protected species

### **Candidate Site Analysis**

#### CS/0069

There are strong highway concerns in relation to this site, it is unlikely an access can be achieved; it would not be capable of improvement to provide acceptable visibility splays. The site is also located in an elevated position in a sensitive area in terms of landscape. This site is not considered appropriate for development.

#### CS/0115

This site can be accessed and appears to be reasonably sustainable; however the majority of the site is located in Zone C2 floodplain and would therefore not be suitable for residential development.

#### CS/0117

Access for one dwelling could be achieved using the existing private driveway for Brambles and Greenacres. The development of this site would appear prominent in the rural approach to the village due to its elevated position on the edge of the settlement and in any case would make little contribution to the required housing need in the area.

#### PV20

This site was originally considered the best option for a small development in Mitchel Troy due to its well screened location with minimum impact on the surrounding landscape. It has since been determined that the site is used as an area for the Better Woodlands for Wales Grant scheme. The landowners of the site have stated that they do not wish the site be considered for development.

#### PV21

This site is located in a prominent area on the approach to the village from the south west with no clear defensible boundary; it can be accessed in highway terms although this would be in the form of individual accesses. A

small portion of the site is also located in Zone C2 floodplain and therefore would be unsuitable for development.

PV35

Although an access to this site is technically feasible it would involve significant earthworks resulting in considerable costs that are likely to affect the viability of this site. It is also located in an extremely prominent position on the entrance to the village on rising land and is of borderline SINC quality. This site is not considered appropriate for development.

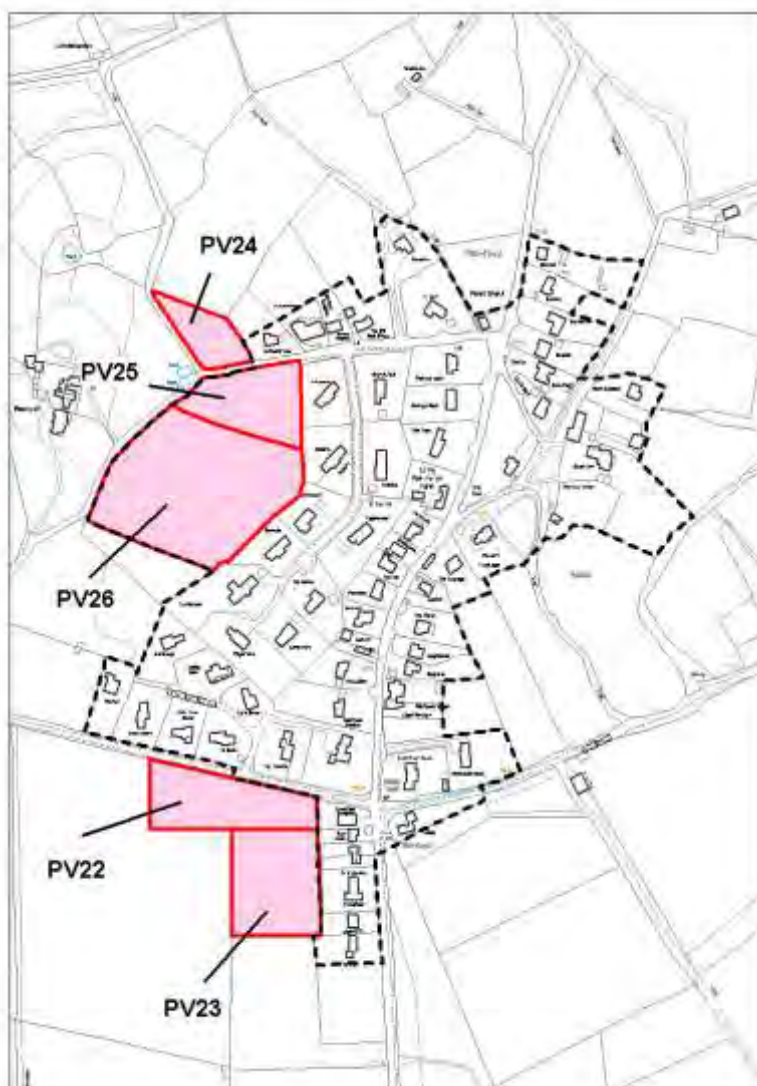
**Council's Response:**

Mitchell Troy is currently a Policy H4 infill village in the UDP. It has reasonable access to public transport but is of a relatively small size and has limited facilities. There is a high level of affordable housing need in the Mitchel Troy Community Council area. It has not been possible to identify any suitable site in the village, however, and it is considered that it should not be designated as a Main Village.

**Conclusion:**

Mitchel Troy, under Policy S1 of the Deposit LDP, is designated as a Minor Village where small scale residential development will be allowed subject to LDP Policy H3.

## 19. PENALLT



**51** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Penallt are summarised as follows:

GWT made the following comments:

- No objection to PV25 but would expect protection and retention of hedgerows and trees and protection of priority species in the development process.
- Object to the development of PV26 as large proportion qualifies as a UKBAP Priority Habitat and S42 habitat.

GGAT commented that PV25 and PV26 have no known archaeological restraints. No reason for not allocating.

CCW made the following comments:

- Any development of PV26 and PV26 should make provision for the protection of existing landscape and ecological features and minimise potential impacts on biodiversity.
- Village is within the AONB and the allocation exceeds the identified housing need for the Community Council area. Possible conflict with national policy and legislation relating to AONBs, thus proposal fails to meet Test of Soundness C2.

Dwr Cymru Welsh Water has confirmed water facilities in the village as being acceptable but has advised that there are no public sewers in the area.

WVAONB commented that any development should be directed to PV25. PV26 would be visible from some distance and would have a detrimental impact on the AONB.

The Biodiversity and Ecology Officer for Monmouthshire County Council recommends that PV26 not be allocated as it has been identified as being of SINC quality. Further ecological assessment will be necessary for PV25, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Trellech Community Council submitted the following comments:

- Building on Greenfield sites is unwelcome.
- Lack of infrastructure and services in village.
- Poor water pressure.
- Drainage and flooding issues.
- Inadequate telecoms and broadband services.

The owner of sites PV24 and PV25 has confirmed that she would like her land to be considered for development. It is also confirmed that there is a no building covenant on the land, although it is believed that this may have already been breached.

#### 45 individuals submitted comments as follows:

30 individuals signed a petition submitted by the landowner of part of PV22 in favour of potential housing development at Penallt on PV22 and PV23 on the following grounds:

- No impact on neighbours amenity.
- Minimal impact on the feel of the village.
- Good access.
- No drainage issues.
- No covenants on the land.

General comments:

- No clear evidence of the level of need in the Community Council area.
- Scale of development out of keeping with the village.
- Inconsistencies in the criteria ratings in the site assessments.
- Poor road access to the village.

- Lack of services and infrastructure.
- No mains sewerage or gas.
- Issues of flooding and surface water drainage.
- Poor water pressure.
- Problems of continuity of electricity supply and broadband speed.
- Increase in road traffic.
- Area identified as having radon gas by the Health and Protection Agency.

4 representations received in relation to PV22:

- Not as prominent or ecologically sensitive as other sites.
- Greenfield land.
- Poor access.
- Constitutes ribbon development.
- Impact on views.
- Issues of flooding and surface water drainage.
- Impact on amenity of neighbouring houses.

3 representations received in relation to PV23:

- Not as prominent or ecologically sensitive as other sites.
- Greenfield land.
- Issues of flooding and surface water drainage.
- Impact on amenity of neighbouring houses.
- Land is in a number of different ownerships.

3 representations received in relation to PV24:

- Poor access.
- Issues of flooding and surface water drainage.
- Land subject to a restrictive covenant.

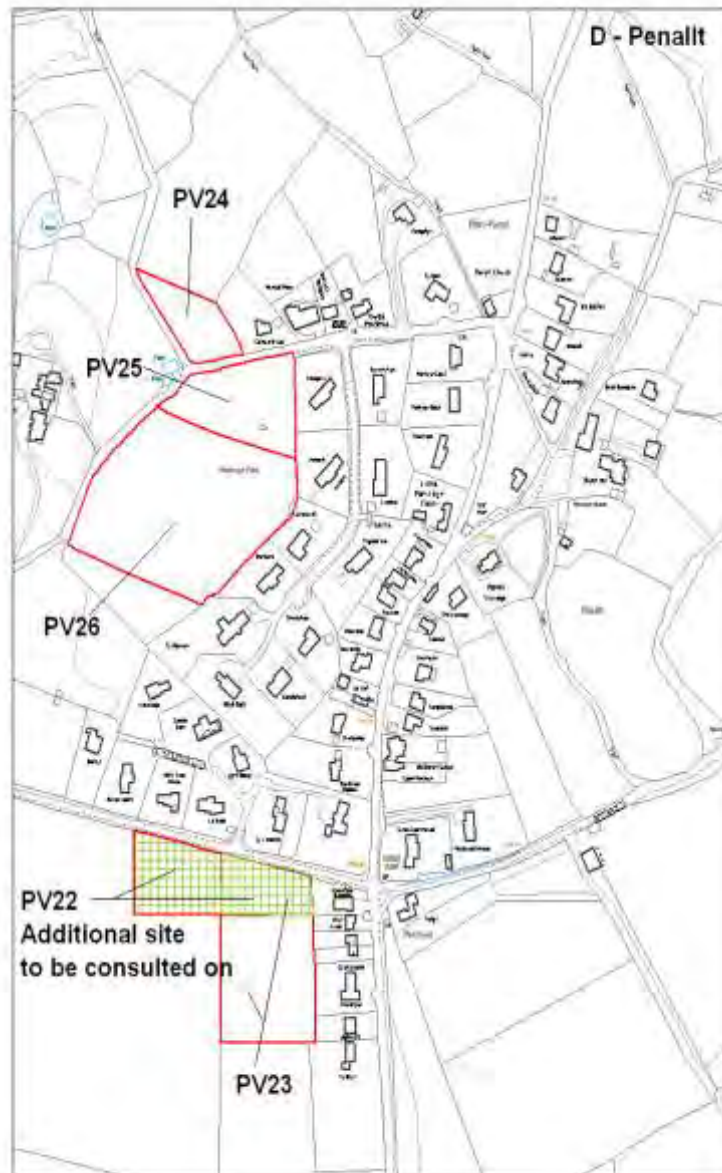
11 representations received in relation to PV25:

- Prominent in the AONB landscape.
- Land subject to a restrictive covenant.
- Site contains the septic tank serving Moorcroft Cottage and Moorcroft House.
- Poor access.
- Issues of flooding and surface water drainage.
- Impact on biodiversity.
- Agricultural land.
- Impact on amenity of neighbouring houses.

12 representations received in relation to PV26:

- Prominent in the AONB landscape.
- Access would need to be achieved through PV25.
- Issues of flooding and surface water drainage.
- Agricultural land.
- Impact on biodiversity.
- Impact on amenity of neighbouring houses.

## Alternative Village Sites Consultation



**45** Representors submitted comments on the proposed **alternative village site** PV22 Land opposite Green Pastures.

The main issues raised in relation to Penallt are summarised as follows:

GWT has no objection to the development of the site but would expect retention and protection of hedgerows, and protected and priority species and neighbouring Local Wildlife Sites to be taken account of in the development process.

CCW submitted the following comments:

- It is unclear whether PV22 is intended to replace or be considered in combination with sites PV24 and PV25. Clarification is needed.



- Any development at PV22 should make provision for a landscape buffer to provide a defensible boundary to the settlement and mitigate any visual impact.

WVAONB commented that PV22 is a potential alternative to PV25 Land to the rear of Whispers although PV25 is slightly more favoured. Care needed with landscaping both around and within the site.

Trellech United Community Council made the following comments:

- Previous applications to change the designation of the land to garden use have been refused.
- Visual impact on the entrance to the village.
- Problems of surface water drainage.
- Capacity of water supply, electricity and broadband.

79 individuals signed a petition, of these 33 individuals also submitted separate comments:

- Do not support any extension of the village onto greenfield land.
- Impact on the landscape and the Wye Valley AONB..
- Poor infrastructure and high water table would make development unattractive and expensive for the provision of affordable housing..
- Development without investment in infrastructure will impact existing and future residents.

The landowner of PV22 submitted the following comments in support of the site:

- Development would be in keeping with rest of the village.
- No impact on neighbour amenity.
- Good access.
- No drainage issues.
- No restrictive covenants on the land.

The landowner of PV23 Land to the south west of Penallt stated that they had no wish to sell the land.

#### 41 individuals submitted comments as follows:

10 individuals submitted comments in support in principle of the development of affordable housing in the village for local people.

General Comments:

- Lack of local services and facilities.
- Poor infrastructure.
- No mains drainage.
- No evidenced local need for further housing.
- Village is within the AONB.

22 representations received in relation to PV22:

- Greenfield agricultural land, previous applications to change the designation have been refused.
- Outside village boundary.
- Impact on approach to village.
- Constitutes ribbon development.
- Currently provides natural boundary to the village.
- Poor access.
- Issues of priority and protected species.
- Proximity to Pentwyn Farm Reserve.
- Problems of surface water drainage.
- Impact on neighbour amenity.

6 individuals commented that PV22 would be the preferred site if development is required:

- Direct access to main routes.
- Not visible in far views.
- Close to village amenities.

21 representations received in relation to PV23:

- Impact on approach to village.
- Elevated Greenfield site.
- Outside village boundary.
- Privately owned land.
- Subject of previously refused planning permissions for change of use.
- Poor access.
- Issues of priority and protected species.
- Proximity to Pentwyn Farm Reserve.
- Problems of surface water drainage.
- Possible area of medieval settlement.
- Impact on neighbour amenity.

3 individuals commented that PV23 would be the preferred site if development is required:

- Direct access to main routes.
- Not visible in far views.
- Close to village amenities.

6 representations received in relation to PV24 Land to the north west of Penallt:

- Subject to restrictive covenant.
- Poor access.
- Proximity to Pentwyn farm Reserve.
- Outside village boundary.
- Impact on neighbour amenity.

10 representations received in relation to PV25:

- Subject to restrictive covenant.
- Impact on listed building.
- Poor access.
- Environmental impact.
- Proximity to Pentwyn farm reserve.
- Grade 3 agricultural land.
- Impact on neighbour amenity.

9 representations received in relation to PV26 Land to the west of Pentwyn Park:

- Impact on listed building.
- Environmental impact.
- Proximity to Pentwyn farm Reserve.
- Large proportion of site qualifies as UKBAP Priority Habitat and S42 Habitat and is of SINC quality.
- Visible over a wide area.
- Grade 3 agricultural land.
- Impact on neighbour amenity.

2 individuals commented that PV26 would be the preferred site if development is required:

- Direct access to main routes.
- Not visible in far views.
- Within existing curtilage of the village.
- Close to existing services.

## Candidate Site Analysis

### PV22

The eastern portion of the original site area put forward for PV22 is not in the same ownership as the landowner for the western area, the landowner of the eastern portion of the site has stated they do not wish for it to be developed. The site boundary has therefore been amended to exclude this part of the site although it is proposed to be included within the village development boundary. There were initial concerns with respect of highways in relation to access to the site as the depth may be required to be increased to provide a sufficient access road, however, the site could be widened if deemed necessary as the field is owned by one landowner who is willing for the land to go forward for development. The site is located within a landscape character area that has medium sensitivity and medium capacity. The development of the frontage of this site will enable the continuation of the building line of the houses to the north of the adjacent road and has good links to the core of the village and also the nearby Tennis Club. The western portion of PV22 is considered most appropriate for development in the Penallt area although may require additional amendments to the boundary to provide sufficient access and site area.

#### PV23

This site is located immediately adjacent PV22 and would have provided a rationalisation of the proposed site. The owner of this site has however confirmed that they do not wish for this site to be put forward for development.

#### PV24

The site is of a limited size and could only accommodate approximately two dwellings; it is located in an area of high/medium sensitivity and medium capacity and could present a potential rounding-off area. The site however has a restrictive no building covenant and the site therefore appears to be unsuitable for development.

#### PV25

This site was originally considered the best option for a small development in Penallt due to the ease of access to the site and its location close to the existing built form. The site is located in an area of high/medium sensitivity and medium capacity. However it has since been confirmed that the site has a restrictive no building covenant and the site therefore appears to be unsuitable for development.

#### PV26

The development of this site in isolation would appear somewhat out of place in the surroundings as it would not have a direct frontage link with the rest of the village. It is located in an area of high/medium sensitivity and medium capacity and has also been designated recently as a SINC. This site is not considered appropriate for development.

#### **Council's Response:**

Penallt is an H4 infill village in the UDP. As the village, however, is of a reasonable size with a reasonable range of community facilities and has development opportunities, it is considered that it could be classed as a Main Village in the LDP. The preferred site, part of PV22, is on the least sensitive side of the village in landscape terms, albeit that it is in the Wye Valley AONB. Private sewage treatment works would be required.

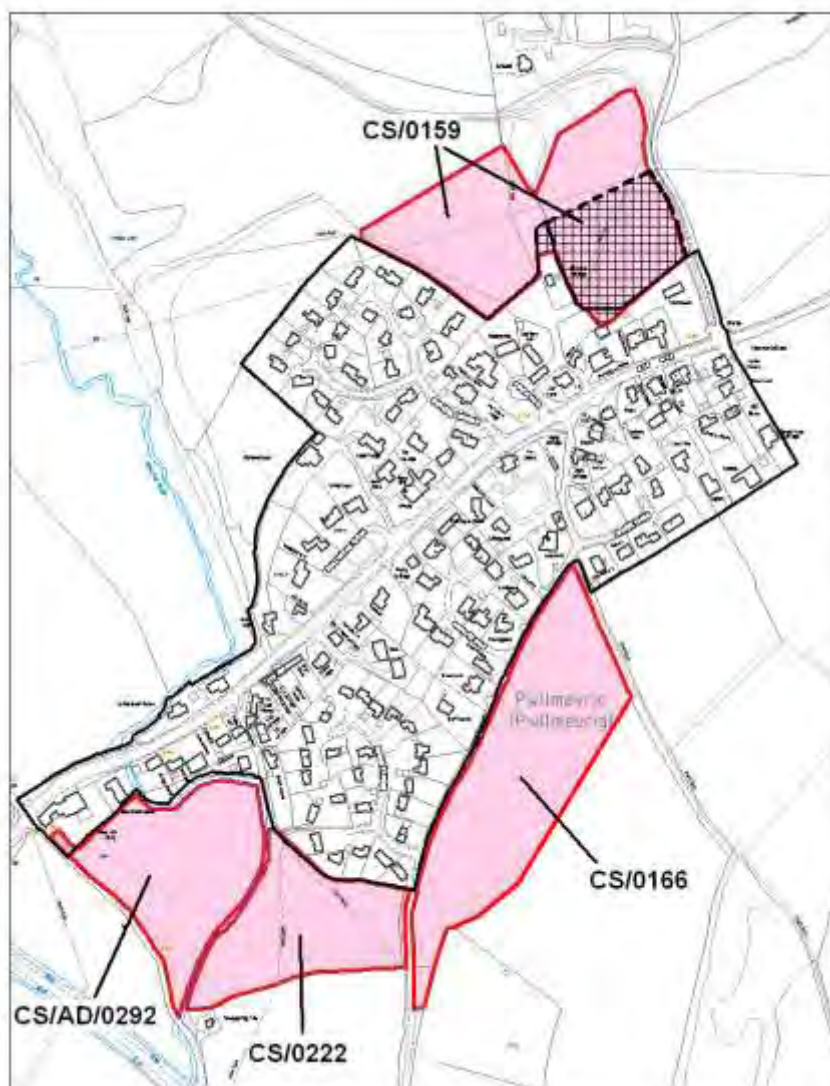
#### **Conclusion:**

Penallt is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of PV22, Land to the south west of Penallt, is allocated in the Deposit LDP for a maximum of 10 dwellings.

A VDB is drawn around the main built form of the village (with an enlargement to include the new housing allocation).

## 20. PWLLMEYRIC



**51** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Report** and its proposals.

The main issues raised in relation to Pwllmeyric are summarised as follows:

GWT object to CS/0159 as a large proportion of site qualifies as a UKBAP Priority Habitat and S42 habitat.

GGAT commented that no reason for not allocating CS/0159 as line of Roman road is not within area proposed for allocation.

CCW made the following comments:

- CS/0159 identified as having „medium“ biodiversity value, if taken forward landscape features and biodiversity habitat should be protected.
- Hard to justify the allocation of CS/0159 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6

(para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)

- Any development of CS/0159 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to CS/0159 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to CS/0159, the approach road is an integral part of the Grade 11\* Mounton House development, it's also within the Registered Garden.

Mathern Community Council commented that access to both sites is poor, as it would be off of the busy A48, and more housing would exacerbate existing sewerage problems.

The agent acting on behalf of the promoters of CS/AD/0292 submitted the following comments:

- Majority of the site is outside the C2 flood plain.
- The stream running along the south-eastern boundary of the site provides a natural limit to development and so would not erode the green wedge between Pwllmeyric and Mathern.
- No impact on the Historic Park and Garden.
- Site would not have adverse impact on the setting of Mounton House.
- Development of the site would provide an opportunity to improve access on Pwllmeyric Hill.
- Site scores better against sustainability criteria than CS/0159.

The owner of site CS/0159 has advised that he has been in contact with the County Highway Engineers and has submitted access proposals for the site.

#### 44 individuals submitted comments as follows:

1 representation received in support of CS/0159:

- The site is not highly visible in the landscape.

General comments:

- No clear evidence of local need.
- Extension of the VDB is not consistent with existing UDP policy.
- Scale of development out of keeping with the village.
- Lack of local facilities and services.
- Issue of drainage and sewerage capacity and affect of increases on Mounton Brook.
- Continuity of power supply.
- Increase in traffic.
- Capacity of High Beech roundabout.

28 representations received in relation to CS/0159:

- Poor road access.
- Greenfield land.
- Within a conservation area.
- Impact on biodiversity.
- Proximity to Mounton House, a grade II\* listed estate.
- Impact on amenity of neighbouring houses.

2 representations received in relation to CS/0166:

- Highly visible from the road.
- Poor access.
- Encroach into the Conservation Area.

2 representations received in relation to CS/0222:

- Issues of flooding.
- Represents a green buffer between Pwllmeyric and Mathern.

1 representation received in relation to CSAD//0292:

- Issues of flooding.
- Represents a green buffer between Pwllmeyric and Mathern

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Pwllmeyric:

#### CS/0159 Hill Farm Cottage, Pwllmeyric

The agent acting on behalf of the promoters of CS/0159 submitted the following comments in support of the site:

- A topographical survey confirms that access can be attained between Crofters Ash and the rear of Pwllmeyric House.
- An ecologist has undertaken a site visit and confirmed that mitigation strategies can reduce the impact of development.
- The site is not within the green wedge or the Wye Valley AONB. Nor is the site in a flood plain or part of the essential setting for Mounton House.
- Comments relating to the capacity of Highbeech should not be attributed to just one development or community.

1 individual submitted comments in relation to CS/0159:

- Concerns in respect of biodiversity and ecological and conservation matters. Additional work needed in respect of this site.

#### CS/AD/0292 Land to the south-east of New Inn, Pwllmeyric

The agent acting on behalf of the promoters of CS/AD/0292 submitted the following comments:

- Safe access to the site would allow for improvements to the A48 in the locality. Access is assessed as red but access from Bridge House would be in same ownership.

- Unlikely that suitable access can be provided to CS/0159 with previous submissions proven unsatisfactory.
- CS/AD/0292 is a more logical site for development and should be allocated in place of CS/0159.

### Access to CS/0159

Following lengthy correspondence with the highways team, revised plans were drawn up and submitted by the land owner in April 2011. Plan MEM/HF/01 shows a topographical survey of Hill Farm, Pentwyn Close and the entrance into the site. Plan 12345/678 shows potential access into the site including a new access to Hill Farm, stopping up of existing access to Hill Farm, width of carriageway, verge and footway as well as a proposed footway to tie in with the existing. An email dated 13<sup>th</sup> April 2011 from the highways team states that the highways team have no highway objections to a small residential development at this location.

### Candidate Site Analysis

#### CS/0159

The south eastern corner of this site is considered to be the least conspicuous area of the site in the surrounding landscape and is best related to the existing settlement form of Pwllmeyric. It was originally considered by highways that there would be difficulties obtaining access to the site, however, discussions and further investigations have since taken place and a potential access to the site has been approved by highways in principle. The site is located within a character area that has high/medium sensitivity in landscape terms but medium capacity. This site is positioned neatly in the north eastern corner of the settlement away from the setting of Moun-ton House. The site itself is also not within the Registered Garden. A public right of way runs through part of the site and would need to be diverted or incorporated into any proposed development. It is considered that this site would have the least impact on the village of Pwllmeyric in terms of both landscape and historic designations and could provide a rounding-off opportunity for the settlement to meet the housing requirements in the area. There are concerns about biodiversity issues but these are not considered sufficient to prevent development of the site.

#### CS/0166

This site is located within the Mathern Conservation Area, is close to the Wyelands Historic Park and Garden and is located within the Essential Setting. Any housing development within this location would compromise the openness and character of the area. It is located within the Green Wedge between Pwllmeyric and Mathern. The significant impact on the landscape and historic environment is considered to rule out any proposed development in this location.

#### CS/0222

There are highway concerns in relation to this site; improvements would need to be made to the northern section of Chapel Lane if this site were to be



developed. Approximately a third of the site is located in Zone C2 floodplain and therefore would not be suitable for a residential use. Furthermore the site is located within the Green Wedge between Pwllmeyric and Mathern, development of this site would have a severe impact on the openness and gap between the two settlements. This site is not considered appropriate for development.

#### CS/AD/0292

There are strong highway concerns in relation to this site, it is unlikely an access can be achieved; a new access off Mathern Road would be required to access the site which would require acquisition of land outside the site boundary. A large portion of the site is located in Zone C2 floodplain and would therefore not be suitable for residential development, only a small area behind the New Inn public house is located outside the floodplain. The site is located within the Green Wedge between Pwllmeyric and Mathern, development of this site would have a severe impact on the openness and gap between the two settlements. Consequently, the impact of development on this site on the surrounding landscape combined with its location within Zone C2 floodplain renders this site inappropriate for development.

#### **Council's Response:**

Pwllmeyric is a Policy H3 village in the UDP and has a VDB. The village is a relatively large settlement with a good range of community facilities and good public transport access to Chepstow, which is a short distance away. The evidence points to a widespread need for affordable housing in the rural parts of Monmouthshire and a need for 20 affordable dwellings in the Mathern Community Council area was established in the Welsh Rural Housing Enabler Study. (An earlier local housing needs survey in 2005 identified 13 households in need).

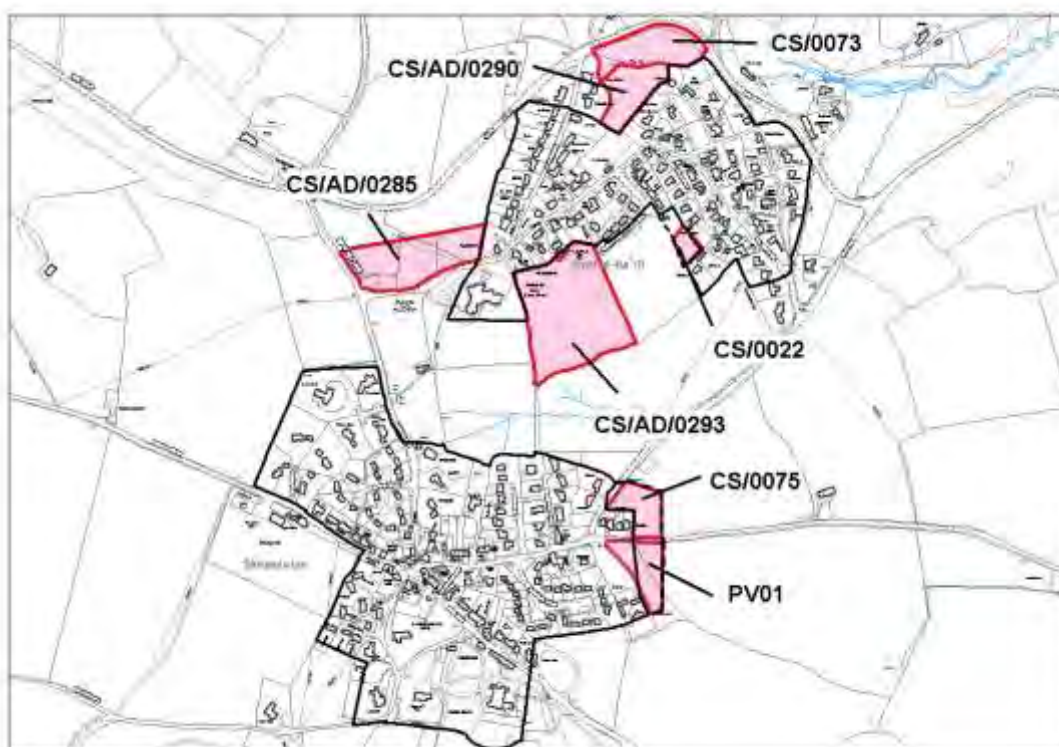
#### **Conclusion:**

Pwllmeyric is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/0159, Hill Farm, is allocated in the Deposit LDP for a maximum of 15 dwellings.

The existing VDB is re-affirmed, subject to an extension to accommodate the new housing allocation

## 21. SHIRENEWTON/MYNYDDBACH



**22** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Shirenewton/Mynyddbach are summarised as follows:

GWT has no objection to PV01 and CS/0075 but would expect protection and retention of hedgerows and protection of priority species in the development process.

GGAT has commented that both PV01 and CS/0075 can be allocated but archaeological evaluation needed prior to planning permission.

CCW made the following comments:

- Hard to justify the allocation of PV01 and CS/0075 as no housing needs survey undertaken. Concerns about the deliverability of the sites contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)
- Any development of PV01 and CS/0075 should make provision for a landscape buffer to provide a firm defensible boundary and minimise landscape impacts.

Dwr Cymru Welsh Water has confirmed sewerage facilities as being acceptable but has advised that there are some water supply problems in the area.

The Principal Landscape & Countryside Officer for Monmouthshire County Council commented that the area is of low capacity for development and thus it would be inconsistent to allocate PV01 and CS/0075.

The Biodiversity and Ecology Officer for Monmouthshire County Council commented that in relation to PV01 further ecological assessment will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

Shirenewton Community Council submitted the following comments:

- Shirenewton and Mynyddbach should be considered as separate villages.
- No survey has been carried out to establish the level of local need.
- Scale of development out of keeping with the village.
- Object to the preferred sites as in conjunction with recent and proposed new development would give the appearance of an estate at the entrance to the village.
- The preferred sites are in an area of high sensitivity and low capacity in landscape terms.

The agent acting on behalf of the landowner of CS/0073 commented that the preferred sites do not represent a level of growth appropriate to the size of the settlement. The assessment of their site against sustainability criteria needs reviewing with more in-depth studies.

The agent acting on behalf of the landowners of PV01 support its allocation on the grounds that the village has the potential for a modest expansion and the site is immediately adjacent proposed development.

The agent acting on behalf of 6 residents questioned the “soundness” of the approach to rural housing allocations on the following grounds:

- The viability of the threshold and percentage for affordable housing has not been proven.
- No evidence of the level of local need.
- Site selection is flawed on the grounds that the sites are much larger than required.
- Access could not be achieved to the preferred sites without the removal of high value habitat.
- Ecological surveys should be undertaken before allocation not before development.

7 individuals submitted comments as follows:

General comments:

- Settlements should be treated as two separate villages.
- Lack of infrastructure and services.
- Increase in traffic.
- Sewerage capacity.

2 representations received in relation to PV01:

- Would extend the hard edge of the village.
- Proximity to existing planning permission.
- Site forms part of a larger field which includes a footpath.
- Poor access.
- Impact on views.
- Issue of surface water drainage.
- SLA.
- Impact on value of neighbouring properties.

2 representations received in relation to CS/0022:

- Would facilitate gradual encroachment into open space between the two villages.
- Poor access.

1 representation received in relation to CS/0073:

- Steeply sloping site.
- Poor access.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Shirenewton/Mynyddbach:

CS/0075 Field on eastern edge of Shirenewton & PV01 Land to the east of Shirenewton

Shirenewton Community Council submitted the following comments:

- Building on CS/0075 and PV01, as they are prominent in views from both the north and south, will significantly impact on some of the approaches to Shirenewton.
- The high sensitivity of the landscape and low capacity for housing should be taken into consideration.
- No justification in combining the villages of Shirenewton and Mynyddbach as one settlement.
- The way that the figures for Rural Housing have been determined is flawed. The proposed scale of development taken together with existing commitments would lead to an increase of 18% in the number of properties in the settlement and give the appearance of an „estate“ at one of the main entrances to the village.
- Object to CS/0022 2 Oak View Mynyddbach. Bringing the land within the VDB would potentially allow for houses to be built on land adjacent to site which is already the subject of a planning application.

The agent acting on behalf of 6 representors submitted the following comments in relation to PV01 and CS/0075 Field on eastern edge of Shirenewton:

- Considerable highway improvement work would be required to provide an adequate access. This would lead to the removal of species rich hedgerow.
- Additional ecological work is necessary for PV01, this should be undertaken prior to allocation.

- Any archaeological interest should be investigated prior to allocation.

A letter has been received (January 2011) offering four lots of land around Shirenewton for consideration for residential development. These sites have not been subject to detailed assessment as they were submitted well after the Candidate Site and Rural Housing Allocations Consultation processes had ended. Some land does abut the village boundary on the western edge of Shirenewton but an initial view is that they do not offer better options than the sites chosen.

## Candidate Site Analysis

### CS/0022

This site has been put forward to be included within the Village Development Boundary (VDB). It was previously located within the VDB but was amended in the Unitary Development Plan. The area is currently a garden area and it is accepted that its existing designation as a Green Wedge and Special Landscape Area cannot be justified. The submission does not seek a housing allocation and should a planning application be submitted for a residential use once the LDP is adopted, it would be subject to detailed considerations.

### CS/0073

There are serious highway concerns with relation to this site, it is located in an elevated position above the inside of a bend of the B4235; a new access in this position would be unsuitable in terms of safety and other than that the site appears landlocked. The site has recently been designated as a SINC and there are therefore concerns in terms of impact on biodiversity. The site is in an area of high sensitivity and low capacity in landscape terms, any proposed development would be located in a particularly exposed location prominent in views of passing vehicles on the adjacent road and from wider views across the valley to the north. This site is not considered appropriate for development.

### CS/0075

This site has been decreased in size since the initial consultation and it is considered the southern area of the site adjacent the existing dwellings is one of the most appropriate sites for development of a small number of dwellings in Mynyddbach/Shirenewton. Individual frontage accesses would be acceptable in this location provided sufficient visibility splays could be achieved at the site. Development would have to be carefully implemented as the site is situated close to a Scheduled Ancient Monument, however it is considered this site would have a limited impact on the surrounding landscape and would provide a minor extension of the settlement.

### CS/AD/0285

This site is located on the approach to Mynyddbach from the west, it is particularly agricultural in character and its openness provides significant value in the surrounding landscape. The site is also considered to be of SINC quality and there are therefore concerns in terms of impact on biodiversity.

Any development in this area would have a severe impact on the surrounding landscape and would be incongruous with the existing village form.

#### CS/AD/0290

This site cannot be readily accessed. The site is in an area of high sensitivity and low capacity in landscape terms and there are a number of trees with Tree Preservation Orders on the site, any proposed development would be located in an exposed location and would appear prominent in the surroundings and from wider views across the valley to the north. This site is not considered appropriate for development.

#### CS/AD/0293

There are highway concerns in relation to this site; the field access does not appear to be capable of improvements and also junctions with the adjacent road at an unacceptable location. The whole of the site is designated as part of the Shirenewton Meadows SINC and is therefore of High biodiversity value. Furthermore the site is located within the Green Wedge between Mynyddbach and Shirenewton, development of this site would have a severe impact on the openness and gap between the two settlements. This site is not considered appropriate for development.

#### PV01

Part of this site is located within the existing Village Development Boundary and there would therefore be no objections in principle to residential development in this location. The site area has been reduced in size to reflect its allocation for 5 dwellings only. The site can be accessed easily using the existing private access track. The site is located within a character area of high/medium sensitivity and low capacity however it is not located in a prominent position and would not adversely affect the existing village form. It is considered that the site would provide an effective rounding off of the settlement in combination with the small site at CS/0075.

### **Council's Response:**

Shirenewton and Mynyddbach are closely spaced villages with a clear functional relationship with each other (the primary school is shared and virtually midway between the centres of both villages, for instance). While each could be considered to be relatively sustainable settlements in their own right, it is considered appropriate to treat them as a single settlement with capacity for further development rather than to seek to allocate housing sites in both villages. At the same time, it is considered that it is important to retain the physical separation of the villages through the existing Green Wedge. The evidence points to a widespread need for affordable housing in the rural parts of Monmouthshire and a need for 21 affordable dwellings in the Shirenewton Community Council area was established in the Welsh Rural Housing Enabler Study. The two allocated sites can make a small contribution to meeting these needs, without, it is considered, any significant adverse impacts, as discussed above. The minor adjustment to the VDB at site CS/0022 is also considered to be logical and acceptable.

### **Conclusion:**

Shirenewton/Mynyddbach is designated as a Main Village under Policy S1 of the Deposit LDP.

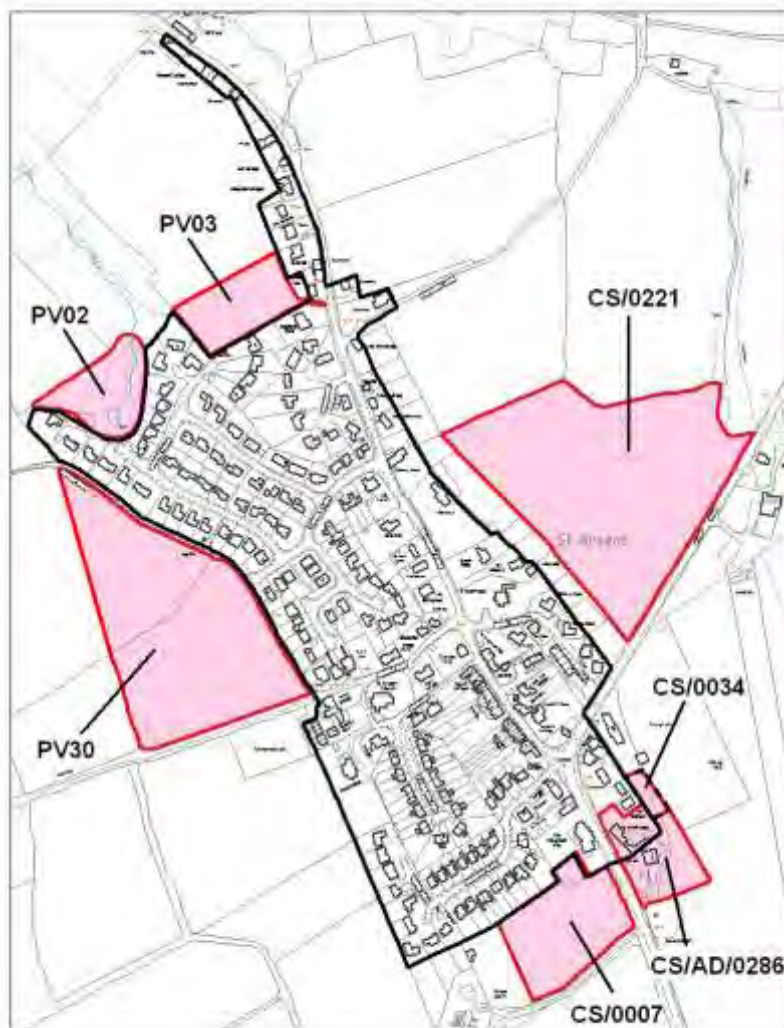
Part of CS/0175, Land to the east of Shirenewton (north of minor road), is allocated in the Deposit LDP for a maximum of 5 dwellings.

Part of PV01, Land to the east of Shirenewton (south of minor road), is allocated in the Deposit LDP for a maximum of 5 dwellings.

The VDB"s around each settlement are re-affirmed to keep the Green Wedge between them, subject to minor extensions to include the new housing allocations and an adjustment to the VDB to the east of the open space at Bleddyn Close.



## 22. ST. ARVANS



**20** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to St Arvans are summarised as follows:

The Conservation Manager for Monmouthshire County Council objects to CS/AD/0286, CS0034 and CS/0221, development would have a detrimental impact on the setting of the historic building, with the land noted as of value within the draft conservation area appraisal.

St Arvans Community Council expressed concern that three additional sites have been identified in the village, despite the fact that the document shows no proposed site allocations. PV30 is seen as a particular concern as it breaks the natural boundary of the village to the west.



An alternative site has been suggested by an agent acting for the owner of the nursery site to the south of Fordwich Close.

18 individuals submitted comments as follows:

General comments:

- Within the Wye Valley AONB.
- Lack of infrastructure and amenities.
- Capacity of village to absorb scale of development.
- Increase in traffic.
- No evidence of local need.
- Sewerage capacity.
- Issues of surface water drainage.
- No mains gas.

7 representations received in relation to PV02:

- Poor access.
- Issues of flooding.
- Impact on biodiversity.
- Loss of woodland.
- Steeply sloping

7 representations received in relation to PV03:

- Poor access.
- Issues of flooding.
- Impact on biodiversity.
- Steeply sloping.
- Loss of agricultural land.

10 representations received in relation to PV30:

- Extends the VDB into open countryside.
- Highly visible.
- Poor access.
- Impact on biodiversity.
- Loss of agricultural land.

1 representation received in relation to CS/0221:

- Size of site out of keeping with scale of development in the village.
- Impact on views.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on St Arvans:

CS/0169 Land at Crossway Green

The agent acting on behalf of the promoters of CS/0169 commented that the site is on the edge of recent housing development, can be easily accessed and is in a more sustainable location than the St Arvans sites.

**Council's Response:**

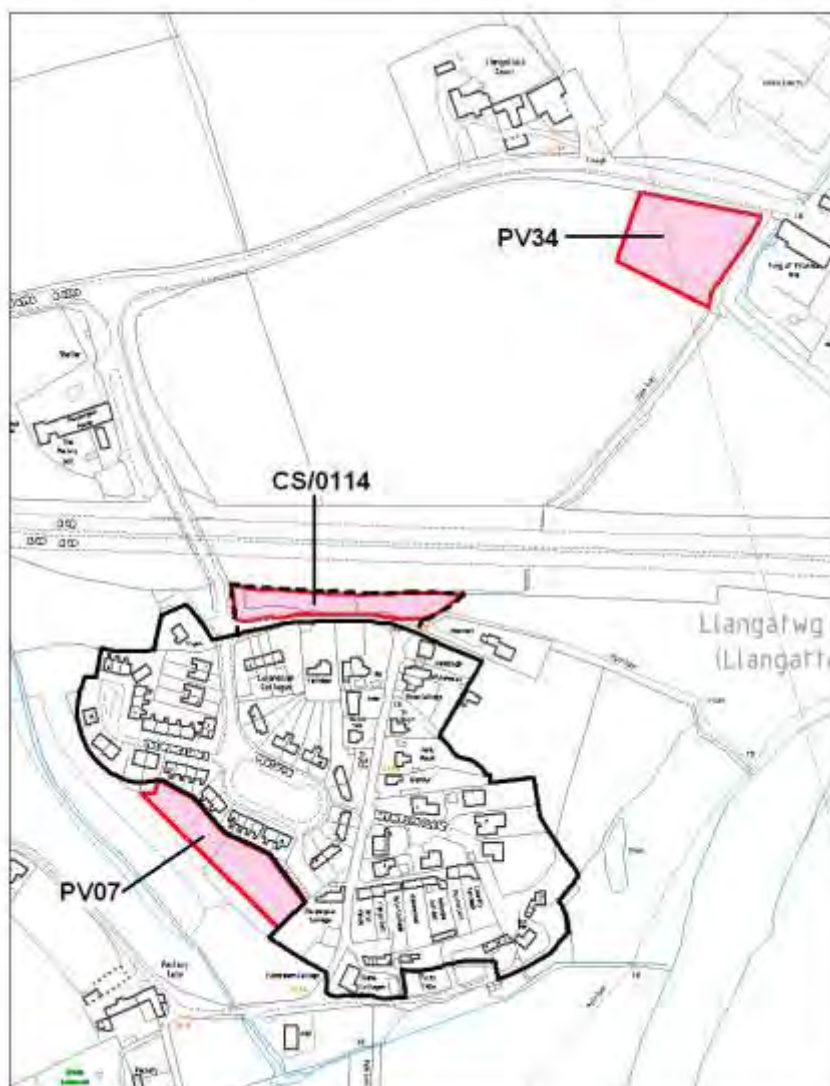
St Arvans is currently a Policy H3 settlement in the UDP. It is a reasonable size with a good range of facilities. There is a relatively frequent bus service to Chepstow, which is a short distance away, should car journeys be necessary to access the town. It is considered, therefore, that it should be designated as a Main Village. No candidate site appraisal is given above, however, as there are currently no development opportunities in the village because of the minerals" safeguarding zone around the settlement..

**Conclusion:**

St Arvans is designated as a Main Village under Policy S1 of the Plan.

The current VDB is reaffirmed.

## 23. THE BRYN



**14** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to The Bryn are summarised as follows:

GWT has no objection to CS/0114 but would expect protection and retention of hedgerows and protection of priority species in the development process.

GGAT commented that CS/0114 has no known archaeological restraints. No reason for not allocating.

Llanover Community Council does not approve of PV34 or PV07. CS/0114 has been refused planning permission in the past, and the owners of the western part of the site do not intend to develop it. Other sites put forward by the Rural Housing Enabler should be considered.

The landowner of the western part of CS/0114 submitted comments stating that they did not wish the land to be put forward for residential use. The owner of the eastern part of the site has confirmed that he would be prepared to make the land available for development.

10 individuals submitted comments as follows:

1 individual submitted comments in support of affordable housing in the village.

2 individuals submitted comments in support of PV34.

General comments:

- Lack of amenities.
- Sewerage capacity.
- Poor access to the village.

9 representations received in relation to CS/0114:

- Proximity of the site to the dual carriageway.
- Poor access.
- Existing agricultural use.
- Impact on value of neighbouring properties.

5 representations received in relation to PV07:

- Steeply sloping.
- Poor access.
- Impact on biodiversity.
- Proximity to children's play area.

3 representations received in relation to PV34:

- Divorced from the village.
- Poor access.

## **Candidate Site Analysis**

### CS/0114

The western portion of CS/0114 is not in the same ownership as the landowner for the eastern area, although the landowner of the eastern area originally put the whole site forward it has since been reduced in size as the landowner of the western portion has stated that they do not wish for it to be developed. The site is restricted in size and could only accommodate a couple of dwellings along the frontage subject to appropriate visibility splays being achievable. There are concerns as there would be an affect on amenity due to the close proximity to the adjacent A48 Trunk Road. The site has been considerably reduced in size, it is very narrow and its close proximity to the A48 and effects this would have on residential amenity renders this site as inappropriate for development.

### PV07

There are highway concerns in relation to this site as there would be difficulties in providing a sufficient access, the only option would be to demolish the adjacent garaging area and provide a convoluted access, however this would prove extremely costly for such a small development and would have a significant effect on its viability. Part of this site is located in Zone C2 floodplain and would therefore be unsuitable for development. It is considered that this site would have an unsatisfactory relationship with the adjoining residential development and along with its access restraints would not be suitable for development. Development would also result in the loss of an existing play area, which would not be acceptable.

#### PV34

Although this site is located in Penpergwm it was considered that due to its close proximity to The Bryn, a public house, employment opportunities and links to the public transport network it should be considered along with the sites at The Bryn. A large Candidate Site was originally proposed at this location for a Caravan and Camp Site (CS/0237) however it would not be appropriate to include this as an allocation within the LDP, it would need to be assessed against Development Management Policies. A small site to the north east corner of the site was however considered for residential development. There are however strong highway concerns in respect of an access in this location and therefore the site is not considered appropriate for being allocated for housing development.

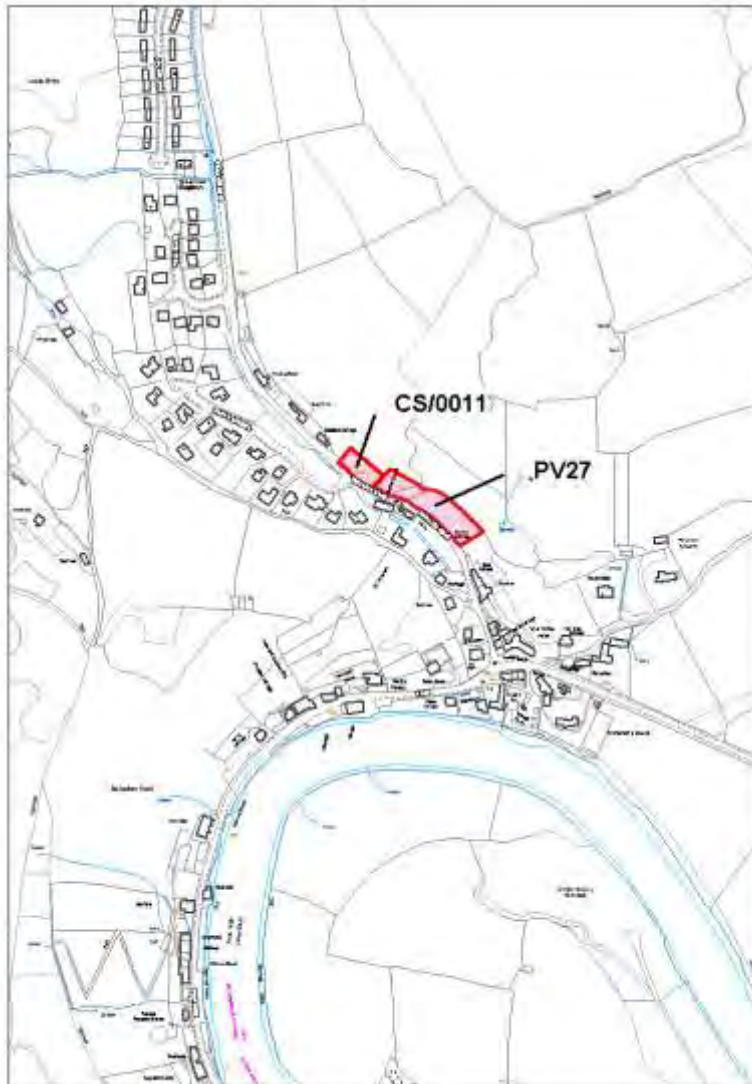
#### **Council's Response:**

The Bryn is currently a Policy H3 village in the UDP. It has some facilities, including a shop and post office but there are limited development opportunities.

#### **Conclusion:**

The Bryn, under Policy S1 of the Deposit LDP, is designated as a Minor Village where small scale residential development will be allowed subject to Policy H3.

## 24. TINTERN



**13** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Tintern are summarised as follows:

Tintern Community Council submitted comments stating that they would be keen to have affordable housing in the village.

12 individuals submitted comments as follows:

General Comments:

- Within the AONB.
- Lack of infrastructure and amenities.

10 representations received in relation to CS/0011:

- Poor access.

- Steeply sloping site, removal of trees could cause landslides.
- Issues of flooding and surface water drainage.
- Impact on biodiversity and habitat.

10 representations received in relation to PV27:

- Poor access.
- Steeply sloping site, removal of trees could cause landslides.
- Issues of flooding and surface water drainage.
- Impact on biodiversity and habitat.

## Candidate Site Analysis

### CS/0011

This is a particularly small site and is likely to only be able to accommodate one or two dwellings along the frontage of the adjacent road, there are however access limitations which could make this difficult to achieve. Part of the site adjacent Trellech Road is also located in Zone C2 floodplain and would therefore be inappropriate for development of this type. Due to the constraints at this site and its small scale it is considered that this site should not be allocated within the LDP.

### PV27

It was considered that CS/0011 could be extended in a south eastern direction to accommodate more growth. However there are significant highway concerns as neither an estate access nor individual frontage accesses could be achieved at the site. Furthermore, part of the site adjacent Trellech Road is located within Zone C2 floodplain and is therefore inappropriate for development of this type. The site has also recently been designated as a SINCE and there are therefore biodiversity constraints at the site. This site is not considered appropriate for development.

### **Council's Response:**

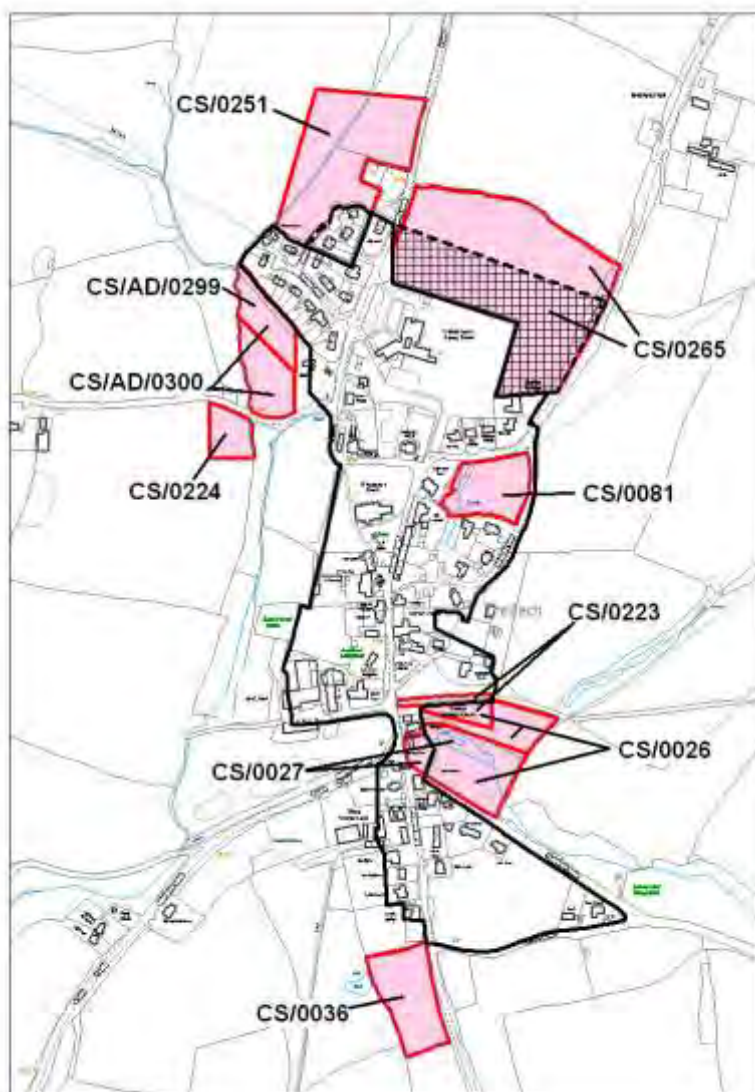
Tintern is currently a Policy H4 infill village in the UDP. It has a large number of facilities, mainly because of its status as a tourist destination, and in this respect would warrant designation as a Main Village. It has a very sporadic character, however, that would make it difficult to define a VDB and there appear to be very limited development opportunities because of the sensitivity of the settlement and its surrounds and topography.

### **Conclusion:**

Tintern, under Policy S1 of the Plan, to be designated as a Minor Village where small scale residential development will be allowed subject to Policy H3.



## 25. TRELLECH



**15** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** report and its proposals.

The main issues raised in relation to Trellech are summarised as follows:

GWT made the following comments:

- No objection to the development of CS/0265 but would expect retention and protection of hedgerows and woodland and retention of hedgerows and protection of priority species in the development process..
- Object to the development of CS/0036 as it qualifies as a UKBAP Priority Habitat and S42 habitat.

GGAT commented that CS/0265 can be allocated but archaeological evaluation needed prior to planning permission.

CCW made the following comments:



- Village is within the AONB and allocation exceeds identified housing need for the Community Council area. Possible conflict with national policy and legislation relating to AONBs, thus proposal fails to meet Test of Soundness C2.
- Hard to justify the allocation of CS/0036 as no housing needs survey undertaken. Concerns about the deliverability of the site contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)
- CS/0036 could contribute to ribbon development, contrary to PPW para 9.3.1, and Test of Soundness C2.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities as being acceptable for Site CS/0265. There are, however, no public sewers to serve CS/0036.

WVAONB recommend that neither CS/0265 or CS/0036 are allocated as development could have a significant impact on the landscape of the AONB.

The Biodiversity and Ecology Officer for Monmouthshire County Council recommends that CS/0036 not be allocated as it has been identified as a SINC. The site also has connectivity value. Further ecological assessment of CS/0265 will be necessary, with the biodiversity, connectivity value and important features of the site acknowledged and considered.

The Conservation Manager for Monmouthshire County Council objects to CS/0223, CS0026 and CS/0027, development would compromise views within, into, and out of the conservation area. In terms of CS/0224 views over the fields are important to maintain.

Trellech Community Council submitted the following comments:

- Building on Greenfield sites is unwelcome.
- Lack of infrastructure and services in villages.
- Development of CS/00265 would require access from the main road by the school.
- Planning permission already given for housing on CS/0081, despite problems with flooding and sewerage.
- Development of CS/0036 would constitute ribbon development. There may also be archaeological issues around the site.

Monmouth Archaeological Society submitted the following comments:

- CS/0036 is a site of considerable Archaeological importance, sites within the modern village are of secondary importance.
- The site should be totally excavated before any development.

The agent acting on behalf of the landowners of CS/0081 commented that its status as a committed housing site should be reflected in the LDP.

The agent acting on behalf of the landowner of CS/AD/0299 and CS/AD/0300 submitted the following comments:

- Sites are well screened and not obtrusive in the landscape.
- Outside of the Conservation Area.
- Adjacent existing development.
- Right of Way available over land to give access to Monmouth Road.

A supporting submission includes; analysis of the Trellech boundary, analysis of the site, photographic evidence including an aerial photo of the site, access to the site, and, a document showing conveyance of the site in April 1979.

The landowner of part of CS/0026 commented that part of the need could be met by the south of the site, alternatively the site could provide workshops for employment in the countryside.

#### 5 individuals submitted comments as follows:

4 individuals submitted comments in favour of CS/0251:

- Road improvements could benefit the whole village.
- Improve access to new doctor's surgery.
- Minimize impact on views into and out of the Conservation Area.

General comments:

- Located in AONB.
- Lack of amenities.
- Outstanding permission already for 9 new dwellings.

5 representations received in relation to CS/0265:

- Proximity to the school.
- Poor access.
- Issues of flooding and surface water drainage.
- Rising site would be visible in the landscape.

### **Candidate Site Analysis**

#### CS/0026

This site has been put forward to be included within the Village Development Boundary (VDB) its current use is a paddock/grazing area. The submission does not seek a housing allocation however there is no requirement for open space to be included within VDB's and therefore it will be assessed on the merits as if the site were put forward for a residential use. The site is located in the centre of the Trellech Conservation Area, an Area of Special Archaeological Sensitivity and is in close proximity to a number of Scheduled Ancient Monuments including the Virtuous Well with open views across. The site is located within a character area that is of high/medium sensitivity and low capacity for housing in landscape terms. Part of the site is considered to be of SINC quality and there are also therefore potential biodiversity constraints at the site. The site provides an important area of open space, any development in this location would have a severe impact on the sensitivity of the surroundings in both historical and landscape terms.

#### CS/0027

This site has been put forward for Craft Units, Residential and a Wildlife Area. The Wildlife Area would not be required to be allocated within the LDP and may not in any case require planning permission, if a proposal for this use came forward that required associated infrastructure it could be assessed under Development Management Policies. The Craft Units could also be assessed under Development Management Policies. With regard to residential development at this site there are highway concerns, however frontage development for a small number of dwellings may be achievable dependent on the location of accesses and visibility splays. The site is however located in the centre of the Trellech Conservation Area, an Area of Special Archaeological Sensitivity and is in close proximity to a number of Scheduled Ancient Monuments including the Virtuous Well with open views across. The site is located within a character area that is of high/medium sensitivity and low capacity for housing. Part of the site is considered to be of SINC quality and there are also therefore biodiversity constraints at the site. The site provides an important area of open space, any development in this location would have a severe impact on the sensitivity of the surroundings in both historical and landscape terms.

#### CS/0036

It was suggested in the Rural Housing Allocations Consultation Draft that this site might be suitable for allocation for five dwellings, particularly if there were delays in the progression of a scheme in connection with CS/0265. There are problems with the sit, however, that render it unsuitable for allocation. Access could be achieved at this site but development in this location would extend the village in an undesirable ribbon fashion towards the south. The site is located outside the Trellech Conservation Area but is located adjacent the Trellech Shrunken Village Scheduled Ancient Monument and there are therefore significant archaeological concerns with respect of this site. The site is located within a character area that is of high sensitivity and low capacity for housing. The site is also of high biodiversity value as it is considered to be of SINC status. The significant impact on the landscape and historic environment is considered to outweigh any proposed development in this location.

#### CS/0081

This site is located within the existing Village Development Boundary (VDB) and already has the benefit of planning permission for residential development. It is not therefore considered appropriate to include this as an allocation in the LDP; the VDB is not proposed to be amended in this location.

#### CS/0223

There are significant highway concerns with respect of this site, visibility is constrained and the existing track would require widening and improvement if the site were to accommodate more than one dwelling. The site is however located in the centre of the Trellech Conservation Area, an Area of Special Archaeological Sensitivity and is in close proximity to a number of Scheduled Ancient Monuments. The site is located within a character area that is of high/medium sensitivity and low capacity for housing. This site forms part of an important area of open space and is therefore not considered appropriate for development.

#### CS/0224

This is a small site to the west of the village in an isolated position away from the existing Village Development Boundary. There are highway concerns; the site cannot be satisfactorily accessed as it is unlikely acceptable visibility could be achieved. The site is located within an area that has high sensitivity and low capacity in respect of landscape. It is also located adjacent the Trellech Conservation Area and an Area of Special Archaeological Sensitivity and is in close proximity to a number of Scheduled Ancient Monuments. The site is of a limited size, would represent an intrusive expansion to the west of the village and is therefore not considered appropriate for development.

#### CS/0251

It is likely that it would have been appropriate for an allocation of a small site in this location through expansion of the existing residential cul-de-sac, however, this site has since gained planning permission for a doctors surgery which will subsequently result in the highway leading to the site being at full capacity once the surgery is built. The site of the doctor's surgery can therefore not be expanded to provide additional dwellings in this location.

#### CS/0265

This site represents the best prospect for development in Trellech although there would be a number of concerns if the whole site were to be developed. The site area was originally of a significant size in comparison to the existing settlement, development of this scale would have an unacceptable impact on the surrounding landscape and an unacceptable expansion in this sensitive rural village. A smaller site area has therefore been identified for residential development in the south eastern corner of the site which is best related to the existing settlement form providing a rounding off of the village to the rear of the school. A sufficient access can be provided onto Monmouth Road, although localised widening would be required, footway provision should also be provided to the centre of the village. The landowner has also suggested that part of the site could be used for a parking area for the school providing wider benefits for the community. The site is located within a character area that has high/medium sensitivity and medium/low capacity for housing; it is located outside the Conservation Area and Area of Archaeological Sensitivity. The development would however have to be carefully implemented as the landscape surrounding Trellech is particularly sensitive due to its historical significance and its location within the Wye Valley Area of Outstanding Natural Beauty. It is proposed this site could seek a comprehensive development in association with providing parking for the school and footpath links to the centre of the village.

#### CS/AD/0299

There are highway concerns in relation to this site as it the site has no frontage onto a public highway. A large part of the site is within an Area of Special Archaeological Sensitivity and the site is also located within a character area that is of high sensitivity and low capacity for housing. The site is also of High biodiversity value as has recently been designated as a SINCC. This would be an intrusive expansion to the west of the village that cannot be

satisfactorily accessed and has high biodiversity interest. This site is not considered appropriate for development.

CS/AD/0300 There are highway concerns in relation to this site that incorporates CS/AD/0299; the site cannot be satisfactorily accessed, it would be unsuitable to have an access off the road to the south. The site is located within an area that has high sensitivity and low capacity in respect of landscape. It is also located adjacent the Trellech Conservation Area, a large portion of the site is within an Area of Special Archaeological Sensitivity and is in close proximity to a Scheduled Ancient Monument. The site is also of High biodiversity value as has recently been designated as a SINC. This would be an intrusive expansion to the west of the village that cannot be satisfactorily accessed and has a high biodiversity interest. This site is not considered appropriate for development

#### **Council's Response:**

While of a small size and with poor public transport services, Trellech has a range of facilities, including a school, doctor's surgery and public house that indicate its importance as a centre for the surrounding rural area. It is an important conservation area village, has a significant archaeological resource and is within a sensitive landscape setting in the AONB. There is a need to achieve an appropriate balance between achieving sustainable development in environmental terms as well as social, but Trellech is clearly worthy of being considered as a Main Village. The selected site provides an opportunity to meet affordable housing needs and provided a valuable amenity in a parking area for the school.

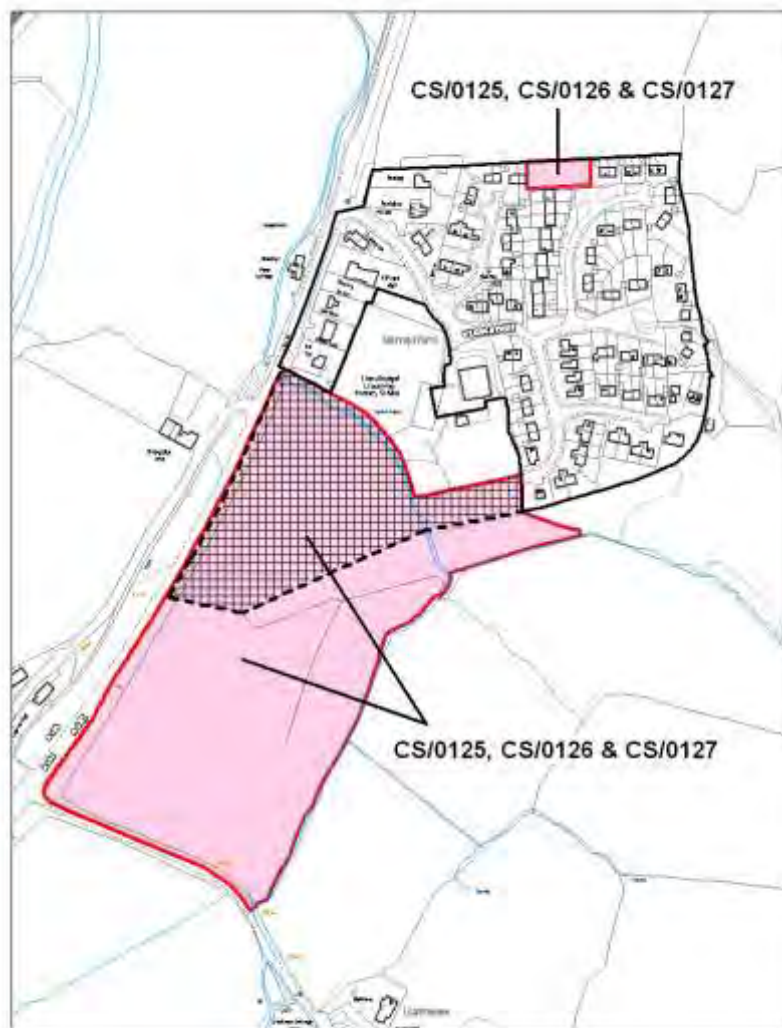
#### **Conclusion:**

Trellech is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/0265, Land adjacent Trellech School, is allocated in the Deposit LDPI for a maximum of 15 dwellings, subject to vehicular access being from the B4293 only, improved pedestrian facilities to the village and provision of car parking area for the adjoining school.

The VDB is reaffirmed, subject to enlargement to accommodate the new housing allocation.

## 26. WERNGIFFORD/PANDY



**67** Representors submitted comments on the **Proposed Rural Housing Allocations Consultation Draft** and its proposals.

The main issues raised in relation to Werngifford/Pandy are summarised as follows:

GWT objects to the development of the larger south-western parts of CS/0125, CS/0126 and CS/0127 as a large proportion qualifies as UKBAP Priority Habitat and S42 habitat but have no objection to the development of the northern parts of CS/0126 and CS/0127.

GGAT object to the inclusion of CS/0125, CS0126 and CS/0127 in the Proposed Rural Housing Allocations due to their proximity to a scheduled ancient monument and the affect on its setting.

CCW made the following comments:

- CS/0125, CS/0126 and CS/0127 identified as of SINC quality. Any development should protect, and where appropriate, enhance biodiversity at the site.
- Hard to justify the allocation of CS/0125, CS/0126 and CS/0127 as no housing needs survey undertaken. Concerns about the deliverability of the sites contrary to TAN6 (para. 2.2.4) and may result in inefficient use of land contrary to PPW (paras. 4.10.5 & 9.1.2)
- Unclear what parts of the three sites are to be allocated.

Dwr Cymru Welsh Water has confirmed sewerage and water facilities as being acceptable.

The Biodiversity and Ecology Officer for Monmouthshire County Council recommends that CS/0125, CS/0126 and CS/0127 not be allocated as they have been identified as of SINC quality, although some parts are of lower value.

CPRW commented that the information for Werngifford/Pandy does not take account of Llanvihangel Crucorney which is effectively part of the same settlement and under the same Community Council.

Crucorney Community Council reiterated a previous request that land be allocated in the Pandy/Werngifford area for affordable housing for local people, allotments and a play area.

An alternative site on the northern side of Werngifford/Pandy has been put forward for consideration for development.

#### 61 individuals submitted comments as follows:

54 individuals signed a petition against the proposed development of CS/0125, CS/0126 and CS/0127:

- Lack of infrastructure and facilities.
- Poor access.
- Issues of flooding and sewerage.
- Possible development in the nearby Brecon Beacons National Park.
- No evidence of local need.

General comments:

- Evidence of local need for affordable housing, plans already underway for development of affordable housing in the Brecon Beacons National Park area.
- Sewerage capacity.
- Capacity of settlement to accommodate proposed scale of development.
- Lack of infrastructure and facilities.
- Problems of continuity of electricity supply.

11 representations received in relation to CS/0125, CS/0126 and CS/0127:

- Poor access.
- Issues of flooding and surface water drainage.
- Impact on biodiversity.
- Proximity to Scheduled Ancient Monument.
- Proximity to the school.
- Increase in traffic.

Although not subject to the **Alternative Village Sites Consultation** the following comments were received on Werngifford/Pandy:

#### CS/0126, CS/0127 & CS/0128 Land adjacent Wern Gifford

1 individual submitted comments in relation to these sites:

- Poor access.
- Increased traffic.
- Problems of surface water drainage.
- Local school is oversubscribed.

### **Candidate Site Analysis**

#### CS/0125 / CS/0126 / CS/0127 (all cover same site area)

These sites were submitted for three different types of development in the same site area (CS/0125- Mixed Use/Settlement Expansion, CS/0126- Residential and CS/0127 Residential Institution/Gradual Care Village), the residential use is however is solely being considered here. The site was originally substantially larger in scale and development of this scale would have an unacceptable impact on the surrounding landscape and dramatically alter the existing village form. A considerably smaller site area has therefore been identified in the north eastern corner of the site which is best related to the existing settlement form of Werngifford, Pandy. The smaller site is located adjacent Zone C2 floodplain, it is considered that this area could however be developed in connection with the site to provide benefits to the community offering an opportunity for community facilities such as a play area and allotments. A satisfactory access to the site can be provided through an extension of Wern Gifford. There were originally concerns with regard to the Grosmont Railway embankment Scheduled Ancient Monument (SAM), however Glamorgan Gwent Archaeological Trust are satisfied that compensatory measures such as repairs to the monument, public access and signage could be provided as a prerequisite for the allocation in the LDP, mitigating against any impact of development on the ancient monument. Any development would have to be of a high standard and carefully implemented as the landscape surrounding Wern Gifford/Pandy is particularly sensitive due to its location in close proximity to the Brecon Beacons National Park and proximity to the SAM; development of this site would however provide an opportunity to enhance the existing edge to the settlement in this location. It is considered that this site would have the least impact on the village of Wern Gifford/Pandy in terms of both landscape and historic designations and could provide a valuable rounding-off opportunity for the village. The Biodiversity Assessment states that the site is of SINC quality and that development



should be avoided. It is considered, however, that, given the importance of the site in providing an opportunity to help sustain a viable community in the village that the biodiversity interest is not sufficient to sterilise the development of the whole site.

A small area at the north of the settlement is also included as a Candidate Site, having been included in the same submission as the southern site. This small site is considered to provide a valuable area of amenity open space. As it is included within the same site ownership, however, there may be the opportunity for planning gain to provide a community facility in association with the larger site. The Council's highway assessment considers that the site can be accessed for up to 20 dwellings off the existing estate road.

#### **Council's Response:**

Werngifford has a school that that is worthy of support and obviously has sustainability benefits for existing residents. There are also other facilities nearby and there is a reasonable public transport service. It is considered, therefore, that the settlement should be designated as a Main Village. As well as helping support the school, the selected site can assist in providing community facilities such as a play area and allotments and is not considered to have any harmful landscape impacts.

#### **Conclusion:**

Werngifford/Pandy is designated as a Main Village under Policy S1 of the Deposit LDP.

Part of CS/0125/CS/0126/CS/0127, Land adjacent Werngifford/Pandy, is allocated in the Deposit LDP for a maximum of 15 dwellings, subject to development avoiding flood plain, protection and enhancement of adjoining Scheduled Ancient Monument and provision of community open space (play area/allotments).

The VDB around the estate is reaffirmed, subject to an enlargement to accommodate the proposed housing allocation

## D. MINOR VILLAGES

In response to the **Proposed Rural Housing Allocations Consultation Draft** and its proposals the following comments were submitted on Minor Villages.

1 representation received asking for Bettws Newydd to be considered for a VDB with potential sites for infill and affordable housing formally identified.

Coed y Paen - development should not be concentrated on the main villages but distributed around H3 villages as well to support the communities in these settlements.

In addition to comments submitted in relation to the Proposed Rural Housing Allocations Report, 22 individuals submitted comments in relation to other Candidate Sites which have been assessed as part of the Local Development Plan process.

1 representation has been received asking for Gwehelog's status to be changed from a Minor Village to a Main Village for the following reasons:

- Land is available at the back of the Hall Inn Public House that could be built with no detriment to the green view of the land behind.
- Council and ex-council houses are already in existence opposite the public house.
- More development would support the public house, the community village hall and the public bus service.

It is considered that none of the Minor Villages considered in the Proposed Rural Housing Allocations Consultation Draft should be re-classified as Main Villages, for the reasons set out in the settlement commentaries contained in that report.

The following villages were recommended for de-classification from minor infill villages (H4 villages in the UDP) and these recommendations are confirmed in the Deposit LDP, the villages not being listed as Minor Villages under LDP Policy S1:

**Llangattock Lingoed**  
**Llanvetherine**  
**Maypole/St Maughans Green**  
**Peny-Clawdd**

## APPENDIX 1 – REPRESENTATIONS RELATING TO CANDIDATE SITE SUBMISSIONS

### Representations relating to Candidate Site Assessments – Usk

#### CS/0033 – Land north/northeast of Castle Oaks

Initial Assessment of Sites Criteria	Reference number of representation with comments	LDP Stage comments were received	Comments made	Councils response
3. Would the development of the site result in the loss of agricultural land (in current or previous use)?	181.F1	Informal Opportunities for Further comment Stage	Agree- believed to be Grade 4.	Comment noted.
4. Is there vehicular access to and from a main public highway?	181.F1	Informal Opportunities for Further comment Stage	Suitable access from Monmouth Road is achievable and there will be no detrimental impact on the surrounding highway network as a result of the proposed. Should be Amber.	The highways assessment undertaken suggests that a satisfactory access could not be provided to the site a red rating is therefore appropriate without any further evidence to prove otherwise.
5. Is the nearby highway network capable of accommodating the resulting traffic movements.	181.F1	Informal Opportunities for Further comment Stage	From the Assessment undertaken it is concluded that the highway network can accommodate the traffic movements. Should be Green.	Question 5 of the Candidate Site assessment reflects the highways assessment undertaken which considers an amber rating be more appropriate.
7. Is the site located within 400m or 800m of a shop or selection of shops selling daily living essentials?	181.F1	Informal Opportunities for Further comment Stage	Agree, but the town centre is easily accessible on foot or by bus.	Comment noted.
11. If the site is proposed for	181.F1	Informal	Agree, but there are employment	Comment noted.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
residential development, how does it relate to any industrial/employment uses adjacent to the site?		Opportunities for Further comment Stage	opportunities within the town of Usk.	
13a. Does the site include or is it close to any areas designated for biodiversity importance at an International level?	181.F1	Informal Opportunities for Further comment Stage	The site is within 450m of the River Usk SAC and SSSI, the amber scoring is therefore not unreasonable. However, the possibility exists for an impact pathway on the SAC/SSSI, but this would need to be assessed based on the final development.	Comment noted.
13b. Does the site include or is it close to any areas designated for biodiversity importance at a national level?	181.F1	Informal Opportunities for Further comment Stage	The site is within 450m of the River Usk SAC and SSSI, the amber scoring is therefore not unreasonable. However, the possibility exists for an impact pathway on the SAC/SSSI, but this would need to be assessed based on the final development.	Comment noted.
14. Is the site likely to affect the habitat, breeding site or resting place of a protected species?	181.F1	Informal Opportunities for Further comment Stage	The ecological report has been prepared and whilst this confirms the potential presence of protected species and habitats, where any impact is identified, it would be possible to implement measures to mitigate/compensate for such an impact. This should therefore score as an Amber.	Comment noted. The detailed ecological study undertaken by Gwent Wildlife Trust provides a detailed site specific assessment. Question 14 relates to habitats, breeding sites and resting places of protected species and due to the presence of European Protected Species issues, potential UK protected species issues and potential UK priority species issues along with UKBAP and LBAP habitats on part of the site a red rating is therefore appropriate.
15b. Is the site located within	181.F1	Informal Opportunities	Agree but it is at the southern most edge of the Gwehelog Valleys SLA.	Comment noted.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
or close to an area designated of landscape importance at a local level?		s for Further comment Stage		
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	181.F1	Informal Opportunities for Further comment Stage	The Landscape Appraisal Report undertaken by RPS demonstrates that a carefully designed development on the site would not impinge upon the setting of the town when viewed from the surrounding landscape and townscape should be Green.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings. A red rating is therefore considered appropriate.
16b. What is the landscape capacity of the site ie what is the limit for acceptable change and the ability of the site to accommodate development	181.F1	Informal Opportunities for Further comment Stage	The survey suggests that controlling development within the site would avoid landscape encroachment. Should be Amber.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultant's findings. A red rating is therefore considered appropriate.

## CS/0176 – Land at Woodside

Initial Assessment of Sites Criteria	Reference number of representor with comments	LDP Stage comments were received	Comments made	Councils response
5. Is the nearby highway network capable of accommodating the resulting traffic movements.	174.F1	Informal Opportunities for Further comment Stage	The Highway network is capable of accommodating the traffic which would be generated by this development. This should therefore be scored as green.	Question 5 of the Candidate Site assessment reflects the highways assessment undertaken which considers an amber rating be more appropriate.
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	174.F1	Informal Opportunities for Further comment Stage	The site is considered to be of medium sensitivity in landscape terms (Amber) given that it lies at the periphery of the existing industrial/employment land uses.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings. A red rating is therefore considered appropriate.
16b. What is the landscape capacity of the site ie what is the limit for acceptable change and the ability of the site to accommodate development	174.F1	Informal Opportunities for Further comment Stage	This should be amber as the site can be developed sensitively.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings. A red rating is therefore considered appropriate.

## Representations relating to Candidate Site Assessments – Raglan

### CS/0213 – Land to the west of Raglan

Initial Assessment of Sites Criteria	Reference number of representor with comments	LDP Stage comments were received	Comments made	Councils response
11. If the site is proposed for residential development, how does it relate to any industrial/employment uses adjacent to the site?	167.S7	Preferred Strategy	The criteria may be incorrect as currently states no. The proposed land uses include residential uses and a retirement village which, although not being close to significant existing employment uses, would be immediately adjacent to new employment uses as part of the proposed land use allocation.	Comment noted, however the site is not located adjacent or close to any employment allocations and should therefore remain as an amber rating. The text however has been amended to state „not close to employment uses” for consistency.
18. Is the site within or adjacent a Conservation Area to the extent that the setting would be affected?	167.S7	Preferred Strategy	It is not certain how development of the site might affect the character and appearance of the area. It should not be concluded that the principle of development on the candidate site would have a detrimental impact on the Conservation Area by virtue of proximity as clearly, appropriate development could preserve and enhance the character and appearance of the area.	The site is located approximately 100m from the Raglan Conservation Area. It is therefore considered to be located close to a Conservation Area and due to the scale of development will be visible from the Conservation Area. An amber rating is therefore appropriate.

## Representations relating to Candidate Site Assessments – Penperlleni

### CS/0113 – Land at Nantyderry

Initial Assessment of Sites Criteria	Reference number of representor with comments	LDP Stage comments were received	Comments made	Councils response
3. Would the development of the site result in the loss of agricultural land (in current or previous use)?	257.F1	Informal Opportunities for Further Comment.	The current usage of the site as a forge and farriers is accepted but then it is considered the development of the land would result in the loss of agricultural land, the reasoning is not consistent and the assessment should read „does not result in the loss of agricultural land“.	The criterion states „in current or previous use“ and the text within the commentary states „previously Grade 4 agricultural land“. Should remain as amber.
4. Is there vehicular access to and from a main public highway?	257.F1	Informal Opportunities for Further Comment.	<p>The site has been used as a farriers and livery with the manufacture of horse drawn carriages and wrought iron products. At its peak twenty vehicles or more would have visited the site daily, which represents a considerable greater usage than that proposed. There is no justification with respect of this criterion.</p> <p>Whilst the access arrangements may not be to the standard required today they have been used historically without incident, for a significant greater usage than that proposed.</p>	Comments noted. The site specific highways assessment undertaken since the Preferred Strategy consultation provides the justification with respect of this criterion, a red rating is therefore considered to be appropriate.



Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
5. Is the nearby highway network capable of accommodating the resulting traffic movements.	257.F1	Informal Opportunities for Further Comment.	The site has been used as a farriers and livery with the manufacture of horse drawn carriages and wrought iron products. At its peak twenty vehicles or more would have visited the site daily, which represents a considerable greater usage than that proposed. There is no justification with respect of this criterion.	Comments noted. The site specific highways assessment undertaken since the Preferred Strategy consultation provides the justification with respect of this criterion. Question 5 of the Candidate Site assessment reflects this highways assessment and due to further detailed information was considered an amber rating be more appropriate.
7. Is the site located within 400m or 800m of a shop or selection of shops selling daily living essentials?	257.F1	Informal Opportunities for Further Comment.	State that the site is within 680m of the shop/post office, garage and fish and chip shop, therefore the site should be assessed as being within 800m of a selection of shops.	The response actually states the following „nearest shop/post office located 680m to south of site on Capel Ed Lane, also a garage selling a limited number of goods (900m), fish and chip shop (900m).“ A red rating is therefore appropriate however the text will be reworded to make this more clear and will state the following „the nearest shop/post office is located 680m to south of site on Capel Ed Lane. There is also a garage selling a limited number of goods and a fish and chip shop within the village however these are located approximately 900m from the site“.
15b. Is the site located within or close to an area designated of landscape importance at a local level?	257.F1	Informal Opportunities for Further Comment.	It is recognised that the site is brownfield, consider that the change from an industrial usage to a residential allocation would be beneficial to the SLA.	Comment noted.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	257.F1	Informal Opportunities for Further Comment.	Maintain that the removal of an industrial usage to a residential allocation would be benefit to the designation of the SLA.	Comment noted.

### CS/AD/0280 – Land at Plough House, Penperlleni

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
2. Is the site located on previously developed (brownfield) land? (as defined in <i>Planning Policy Wales</i> , fig. 2.1)	97.F1	Informal Opportunities for Further Comment.	The site is partly brownfield and should be graded to orange accordingly.	Agree, this was an error in drafting. The text has been amended to state „part of the site is brownfield as it is located within the residential curtilage” and the rating has been changed to amber.
14. Is the site likely to affect the habitat, breeding site or resting place of a protected	97.F1	Informal Opportunities for Further Comment.	The site is unlikely to affect the breeding ground of a protected species and should be graded green.	Comments noted. The ecological study undertaken by Gwent Wildlife Trust provides a detailed site specific assessment. Question 14 relates to habitats, breeding sites and resting places of protected

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
species?				species and due to the potential presence of European Protected Species issues, potential UK protected species issues and potential UK priority species issues along with LBAP habitats on part of the site an amber rating is therefore appropriate.
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	97.F1	Informal Opportunities for Further Comment.	The site adjoins a new housing development and its landscape value is overstated in the assessment and should be re-graded as green.	The landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.
16b. What is the landscape capacity of the site ie what is the limit for acceptable change and the ability of the site to accommodate development	97.F1	Informal Opportunities for Further Comment.	The site has better capacity potential than stated and should be re-graded to at least orange.	The landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.

## Representations relating to Candidate Site Assessments – Devauden

### PV04 – Land to the west of Devauden

Initial Assessment of Sites Criteria	Reference number of representor with comments	LDP Stage comments were received	Comments made	Councils response
4. Is there vehicular access to and from a main public highway?	1905.11	Alternative Village Sites Consultation	It is agreed that the access to this site from Well Lane is „totally unsuited to accommodate development“. There are however two other potential access points. If the front garden of 10 Wesley Way and neighbouring houses were taken to re-open that access (which incidentally I understand was closed without permission from the landowner) the route from the B4293 to that access would be suitable for pedestrian access to the play area, shop and bus stop but unsuitable for vehicular access. Wesley Way is a narrow road where cars and vans are constantly parked and it passes the children's playground. There would however be easy vehicular access to the northern field by extending Churchfields, which is already a double width road, with existing footpaths on both sides. Furthermore the exit from Churchfields to the B4293 has excellent visibility in both directions. A private strip of land is mentioned as if	Comment noted. A site specific highways assessment was undertaken providing the detail for this criteria, question 7 of the highways assessment relates specifically to this criterion and results in an amber status.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			that presents a barrier. My understanding from the landowner of PV04 is that the strip of land whilst separately registered is still his property. Therefore the strip can be considered as part of PV04 itself, and has no ransom value, other than as an integral part of the site. Access is not a problem.	
15a. Is the site located within or close to an area designated of landscape importance at a national level (Area of Outstanding Natural Beauty or Brecon Beacons National Park)?	1905.11	Alternative Village Sites Consultation	The land is indeed within the AONB, but so are both the Wesley Way/Wesley Garden developments and Churchfields. As such whilst strictly speaking the answer attracts a Red, I believe that because any development would immediately adjoin either or both Wesley Gardens or Churchfields as a „continuation“ this could be discounted in any decision.	Comment noted, the rating should however remain as red.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	1905.11	Alternative Village Sites Consultation	Disagree with comments. There is no significant physical boundary other than Well Lane around this site, and any development would presumably be close to the top end of the field for easy access to Churchfields. Any development on the northern field may well be visible from several footpaths as would just about any development anywhere in the village. However it would not be visible from the B4293 from either the south or north of the village. From the south the fact that the site slopes away from Churchfields, means that the Pensioners bungalows and Wesley Garden would shield any development from view. From the north again the land slopes away and the back gardens of Churchfields together with some mature hedging along the boundary of PV04 and CS0024 mean that houses on the site would be visible. Consequently I believe that both questions should therefore be downgraded to „orange“.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			The description in the White report and the candidate site assessment are not consistent, this should be orange not red.	Comment noted, the original text was amended in the Landscape Sensitivity and Capacity Study however due to an error the Candidate Site assessment table was not updated. The Candidate Site assessment has therefore been amended to reflect the Landscape Consultants updated comments however the rating has not been amended as it remains red within the Landscape Sensitivity and Capacity Study. The text in relation to this criterion now states: „The site is located within a character area that has high/medium sensitivity as it forms the open rural approaches to the village from the north and south with visibility from several footpaths and the A4293. The slopes to the west north of the lane are less prominent falling on a minor valley sides with overgrown hedgerows and trees“.
16b. What is the landscape capacity of the site ie what is the limit for acceptable change and the ability of the site to accommodate development	1905.11	Alternative Village Sites Consultation	Disagree with comments. There is no significant physical boundary other than Well Lane around this site, and any development would presumably be close to the top end of the field for easy access to Churchfields. Any development on the northern field may well be visible from several footpaths as would just about any development anywhere in the village. However it would not be visible from the B4293 from either the south or north of the village. From the south the fact that the site slopes away from	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			<p>Churchfields, means that the Pensioners bungalows and Wesley Garden would shield any development from view. From the north again the land slopes away and the back gardens of Churchfields together with some mature hedging along the boundary of PV04 and CS0024 mean that houses on the site would be visible. Consequently I believe that both questions should therefore be downgraded to „orange“.</p>	
			<p>The description in the White report and the candidate site assessment are not consistent, this should be orange not red.</p>	<p>Comment noted, the original text was amended in the Landscape Sensitivity and Capacity Study however due to an error the Candidate Site assessment table was not updated. The Candidate Site assessment has therefore been amended to reflect the Landscape Consultants updated comments and the rating has been changed to amber. The text in relation to this criterion now states: „The site is located within a character area that has a medium capacity for housing as expansion of the village to the north and south would be highly visible, clearly extending its extent and current boundaries which form a logical edge defined by the minor road to Wolvesnewton to the south and a mitigated edge to the north. The western slopes north of the minor road may have some capacity to the PROW if carefully designed and retaining and</p>



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				enhancing existing hedgerows and tree cover, preferably on advance of any development, in order to minimize visibility from the north and south".

### PV37 – Land at Well Lane, Devauden

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
4. Is there vehicular access to and from a main public highway?	1905.11	Alternative Village Sites Consultation	The work required to widen Well Lane and include a footpath on the southern side of the lane would be a major problem. Assuming that an entrance to a site would be at or near the existing ungated wide agricultural entrance (10 metres of hedge ripped out and about 7 metres wide entrance) it would be necessary to rip out approximately 90 metres of hedge. Well Lane is substantially below the level of the site proposed about 1.3 metres on average, and the road would need to be widened by at least 5 metres to include both a double road width	Comment noted. A site specific highways assessment was undertaken providing the detail for this criteria, question 7 of the highways assessment relates specifically to this criterion and results in an amber status.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			<p>and a footpath. Whilst agreeing that visibility to the right is very poor for drivers joining the B4293 from Well Lane, the removal of the hedge on its own would not cure the problem. The bank would also need to be removed, as would a very large tree (which may have a TPO). Incidentally the third party land referred to is in fact the village allotments and owned by the villagers and administered as I understand it by the community council. I would also like to point out that the visibility to the left for people turning right out of Well Lane is also very restricted. The maximum distance that can be viewed is about 25 yards, which at 30 miles per hour means that people joining the B4293 and the people already on the B4293 have just over 1.1/2 seconds to see and react to each other. Incidentally the minimum stopping distance in the Highway Code at 30 miles per hour assuming perfect road conditions is 23 metres. There is also a visibility problem for vehicles coming down the „hall side“ of the village green and joining the B4293 where a</p>	

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			stone wall (part of the Dorretts property) obscures the view to the left on the B4293 and traffic coming out of Well Lane.	
14. Is the site likely to affect the habitat, breeding site or resting place of a protected species?	1905.11	Alternative Village Sites Consultation	This is an area outside my intimate knowledge however PV04 is largely pasture with little in the way of vegetation except grass, whilst PV37 has been allowed over the past few years, since the owner declared it "set aside", to become populated by a range of vegetation, which may well contain flora and fauna of interest. I would like to see specific studies carried out on both sites on a comparative basis by a known authority before any final assessment criteria are submitted to the planning committee.	The detailed ecological study undertaken by Baker Shepherd Gillespie Ecological consultants provides a detailed site specific assessment. The response to criterion 14 provides a very short summary of this. The ecological assessments of the additional Potential Village (PV) candidate sites have been available on the Council's website since September 2010, well in time for the final informal comment stage. The Baker Shepherd Gillespie Potential Village Ecological Assessment of Village Sites document includes an assessment for PV04 and has been available on the Council's website since July 2010.
15a. Is the site located within or close to an area designated of landscape importance at a national level (Area of Outstanding Natural Beauty or Brecon Beacons National Park)?	1905.11	Alternative Village Sites Consultation	PV37 is immediately adjacent to the AONB and the planning report authored by Stuart B Wild and issued after the unsuccessful appeal against planning for the site in 2004 (APP/E6840/A/04/161854) says "in my view this site is a prominent location and the proposed dwellings would be seen as a significant extension of the village into the SLA. The proposal	Comment noted, however the site is not located in the AONB. An amber rating is therefore considered appropriate.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			would be harmful to the character and appearance of the landscape setting of this side of the village" he also writes "landscaping would soften the impact of the development but it would take many years to mature and would not provide a boundary to the village of comparable visual strength to that of Well Lane and its hedgerow."	
15b. Is the site located within or close to an area designated of landscape importance at a local level?				
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	1905.11	Alternative Village Sites Consultation	The description in the White report and the candidate site assessment are not consistent. This rating should be red.	Comment noted, the original text was amended in the Landscape Sensitivity and Capacity Study however due to an error the Candidate Site assessment table was not updated. The Candidate Site assessment has therefore been amended to reflect the Landscape Consultants updated comments however the rating has not been amended as it remains red within the Landscape Sensitivity and Capacity Study. The text in relation to this criterion now states: „The site is located within a character area that has high/medium sensitivity as it forms the open rural approaches to the village from the north and south with visibility from several footpaths and the A4293. The slopes to the west north of the lane are less prominent falling on a minor

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
				valley sides with overgrown hedgerows and trees".
16b. What is the landscape capacity of the site ie what is the limit for acceptable change and the ability of the site to accommodate development	1905.11	Alternative Village Sites Consultation	The site is very visible from the B4293 and this fact, along with the fact that the lane forms a physical village boundary have always been some of the major factors in all previous planning refusals.	A landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.
			The description in the White report and the candidate site assessment are not consistent. This rating should be red	Comment noted, the original text was amended in the Landscape Sensitivity and Capacity Study however due to an error the Candidate Site assessment table was not updated. The Candidate Site assessment has therefore been amended to reflect the Landscape Consultants updated comments and the rating has subsequently been changed to amber as it relates to the character area as a whole. The text in relation to this criterion now states: „The site is located within a character area that has a medium capacity for housing as expansion of the village to the north and south would be highly visible, clearly extending its extent and current

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
				boundaries which form a logical edge defined by the minor road to Wolvesnewton to the south and a mitigated edge to the north. The western slopes north of the minor road may have some capacity to the PROW if carefully designed and retaining and enhancing existing hedgerows and tree cover, preferably on advance of any development, in order to minimize visibility from the north and south".

## Representations relating to Candidate Site Assessments – Llangybi

**CS/0055 – Land at Ton Road, Llangybi and CS/0060 Chapel Field, Llangybi (Representors comments taken together as the comments are the same for both sites, however Councils response will annotate appropriately if a separate response is required with either a CS/0055 or CS/0060 prefix)**

Initial Assessment of Sites Criteria	Reference number of representor with comments	LDP Stage comments were received	Comments made	Councils response
3. Would the development of the site result in the loss of agricultural land (in current or previous use)?	1400.11	Alternative Village Sites Consultation	Development will inevitably result in significant loss of agricultural land (CS/0060 graded as 3 or 4)	Comment noted, an amber rating is appropriate as the land for both sites is Grade 3 or above.
4. Is there vehicular access to and from a main public highway?	1400.11	Alternative Village Sites Consultation	There is currently no vehicular access to either site. Moreover, Ton Road is predominately a single track route, in very poor condition, which has been worsened by recent severe winter damage, water surface erosion and heavy farm traffic. Further growth in traffic volume will undoubtedly exacerbate matters which Monmouthshire County Council will be unable to repair or rectify due to the current financial measures of austerity.	Comment noted. For both sites, the site specific highways assessments undertaken state that although there is no existing access at either site, a satisfactory vehicular access can probably be provided to both, hence an amber rating is considered appropriate.
5. Is the nearby highway network capable of accommodating the resulting traffic movements.	1400.11	Alternative Village Sites Consultation	There is currently no vehicular access to either site. Moreover, Ton Road is predominately a single track route, in very poor condition, which	Comment noted. For both sites, the site specific highways assessments undertaken states that the network is probably capable of accommodating the resulting traffic movements. For CS/0055 a further

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			has been worsened by recent severe winter damage, water surface erosion and heavy farm traffic. Further growth in traffic volume will undoubtedly exacerbate matters which Monmouthshire County Council will be unable to repair or rectify due to the current financial measures of austerity.	note is made in the highways assessment that states modest development will not generate much traffic. A green rating is therefore considered appropriate.
6. Is the site located within 400m or 800m of an access point to regular (at least 5 services between 7am-7pm Monday-Saturday) public transport, e.g. a bus stop or train station?	1400.11	Alternative Village Sites Consultation	The site is located within 400m of a bus stop with a 2 hourly service to local villages and Newport, clearly incompatible with commuting to work. There is no train service or local taxi service. Car ownership is therefore a necessity of living in Llangybi.	Disagree, the bus timetable has been updated with additional services added, the site is actually located within 400m of a bus stop with 11 services each way Monday to Saturday. The rating should therefore remain as green.
7. Is the site located within 400m or 800m of a shop or selection of shops selling daily living essentials?	1400.11	Alternative Village Sites Consultation	Both sites are within 400m of a single village post office but stock is limited and certainly does not sell all daily living essentials. There is no village chemist.	Comment noted; the post office/shop is located within 400m of CS/0055 and 435m of CS/0060, the rating should therefore remain as amber for CS/0055 and red for CS/0060.
8. Is the site located within 1000m or 2000m of a school and other community facilities including recreation open space?	1400.11	Alternative Village Sites Consultation	There is no recognisable public house, but rather an upmarket gastro pub, which has struggled to be a going business concern recently. Indeed ownership has changed no fewer than 3 times in the last 5 years due to poor trade. Moreover, the next nearest pub	Comment noted; a public house, place of worship, public hall and recreation open space are located within 1000m of both sites. The rating should therefore remain as amber for both.



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			(Newbridge on Usk) has again recently stopped trading, despite the significant assets and resources of its millionaire celebrity owner for similar reasons. There is no school within 2km and community facilities are extremely limited. For example there is no recreational open space in terms of a playing field, just a small grass covered play area of some 30 by 50 metres in size for younger children that is infested with grass snakes. There is no Doctor's Surgery or Dental practice. These services in Usk and Caerleon currently have full patient lists and there is no General Practitioner out of hour's emergency medical service provided by either. The nearest police station is in Usk who already struggle to provide support.	
9. Would the development of the site result in the loss of publicly accessible open space or have an effect on the public access networks?	1400.11	Alternative Village Sites Consultation	Development at both sites would without question result in loss of publicly accessible open spaces and networks which it would be difficult to mitigate against.	Disagree, there are no public footpaths running through either site and neither site is designated as Amenity Open Space. The Green rating is therefore appropriate.
10. Is the site located within 100m of existing water, sewerage, electrical, gas and telecommunication systems?	1400.11	Alternative Village Sites Consultation	While the sites are within 100m of existing water and sewerage systems there is clear evidence that these facilities have reached their	Comment noted, Welsh Water in April 2011 have submitted information to show that there are not any capacity issues within this area.

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
			limit and are already under stress with a significant flood risk. Much of the current sewerage system remains un-adopted by MCC for service purposes, especially the upper part of Llangybi, and is the responsibility of the local house residents, and there have been cases of blockages resulting from newer developments simply linking into the existing, old system. Furthermore the HGV Lorries using the narrow lane leading to the treatment plant on the lower church side of the village (R106), have manoeuvring problems resulting in lane erosion. There is therefore no potential for enhancing the system in order to service growth in the village housing stock.	
13c. Does the site include or is it close to any areas designated for biodiversity importance at a local level?	1400.I1	Alternative Village Sites Consultation	Both sites include areas that contain both European and UK protected species with implications for biodiversity. There are UKBAP and LBAP Habitats on CS/0060. Bats and adders in local habitat. Invasive Japanese Knotweed in CS/0060.	Comment noted, this comment does however refer to Question 14, see response below.
14. Is the site likely to affect the habitat, breeding site or resting place of a protected	1400.I1	Alternative Village Sites Consultation	Both sites include areas that contain both European and UK protected species with implications for	Comments noted, the comments in this criterion are summarised using the detailed ecological study undertaken by Gwent Wildlife Trust providing a

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
species?			biodiversity. There are UKBAP and LBAP Habitats on CS/0060. Bats and adders in local habitat. Invasive Japanese Knotweed in CS/0060.	detailed site specific assessment of each site. Question 14 relates to habitats, breeding sites and resting places of protected species, the findings of this assessment are that there are potentially European Protected species at the sites as well as potential UK protected species and UK priority species at the sites. It also states that there are UKBAP and LBAP Habitats on part of each of the sites. The full biodiversity assessment should be referred to for more detailed information. An amber rating is therefore appropriate for both of these sites.
15b. Is the site located within or close to an area designated of landscape importance at a local level?	1400.11	Alternative Village Sites Consultation	CS/0060 is designated as within a Special Landscape Area.	Comment noted, both sites are actually located within a Special Landscape Area and therefore both already have a red rating.
16a. What is the landscape sensitivity of the site ie how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource? (eg field patterns, woodland)	1400.11	Alternative Village Sites Consultation	The site is located within an area that has high/medium sensitivity with rising hill sides to the village and historic listed buildings and features to the north. Housing to all points of the compass would be both prominent and disrupt the setting of the village gateway boundaries.	Comment noted. The landscape sensitivity and capacity study was undertaken by an independent landscape consultant, the assessment criteria for both 16a and 16b reflects the consultants findings.
17. Is the site located within or close to an area designated of	1400.11	Alternative Village Sites Consultation	Local folklore has it that CS/0060 contains the remains of an unexcavated roman road. Both sites	Comment noted, Glamorgan Gwent Archaeological Trust have however undertaken an archaeological assessment of both sites which states that there is

Initial Assessment of Sites Criteria	Reference number of representative with comments	LDP Stage comments were received	Comments made	Councils response
cultural heritage importance? eg. Areas of Special Archaeological Sensitivity, Historic Parks and Gardens, Historic Landscapes and Blaenavon World Heritage Site.			are also close to Llangybi Well, the ancient Standing Stone or Mein Hir, and the Norman Llangybi Castle.	no known archaeological restraint at the site.
19. Are there any listed buildings within or adjacent the site where the development would be to the extent that its setting would be affected?	1400.11	Alternative Village Sites Consultation	CS/0055 is located within 115m from Penarth House which is Grade II Listed.	Comment noted, this is already noted within the text and an amber rating is already provided.
20. Are there any Scheduled Ancient Monuments within or adjacent the site to the extent that its setting would be affected?	1400.11	Alternative Village Sites Consultation	Local folklore has it that CS/0060 contains the remains of an unexcavated roman road. Both sites are also close to Llangybi Well, the ancient Standing Stone or Mein Hir, and the Norman Llangybi Castle.	Comment noted, Glamorgan Gwent Archaeological Trust have however undertaken an archaeological assessment of both sites which states that there is no known archaeological restraint at the site.
21. Is the site located within or adjacent an area prone to flood risk?	1400.11	Alternative Village Sites Consultation	Both sites are within areas prone to flood risk. The most recent housing developments situated in the higher aspects of Llangybi have added significantly to the surface water problems due to the consequent increase in non-permeable surfaces and damage to existing field drains. Indeed several residents keep sandbags at hand in case of heavy rainfall.	Comment noted, this criterion relates specifically to fluvial/tidal flood risk and therefore as neither of the sites are located within one of these flood zones the criteria should not be changed. There is however a note in the further notes section of the form stating that the site may be affected by Surface Water Flooding and therefore requires further investigation in this respect

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22. Does the site's stability or topography present an obstacle to its development for the proposed purpose?	1400.11	Alternative Village Sites Consultation	The site's topography is not in keeping with further housing development due to the rising slopes that would adversely influence the rural environment, the distinctive features of Llangybi's SLA, and the current housing stock's privacy.	Comment noted, this criterion however relates to whether the topography of the land could present an obstacle to its development for example with respect of whether or not it is physically developable. It is considered that both of the sites are capable of being developed, the topography would not provide a barrier to development.
23. Is there evidence that the site could consist of potentially contaminated land?	1400.11	Alternative Village Sites Consultation	There is evidence of potential contaminated land on both sites. We would be grateful for clarification in this regard.	Comment noted, the Council's database of potentially contaminated land was used in response to this criterion and does not show any potentially contaminated land at either of the sites.