



## Gypsy and Traveller

Consultation report

## Monmouthshire

Monmouthshire County Council

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# 1. Executive Summary

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- 1.1 This consultation report details the findings for Monmouthshire County Council's Gypsy and Traveller consultation and the key issues raised by residents and stakeholders during the consultation.
- 1.2 The consultation delivered was in accordance with the consultation plan which can be found in **Appendix 1**.
- 1.3 The key headlines include:
- 410 people provided feedback to this consultation, via completing a paper or online feedback form, email, or telephone.
  - The consultation was reached by more than 30,000 social media users and there were almost 1,500 total views to the webpage.
  - Feedback on sites range from concerns about noise and pollution to road safety and impact of neighbourhoods.

## 2. Introduction

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### Overview

2.1 Monmouthshire County Council (MCC) has a legal and moral duty to ensure everyone has access to good quality homes. The Council recognises that safe, culturally appropriate accommodation is necessary for individuals to flourish in other parts of their lives.

2.2 The Council's Gypsy and Traveller Accommodation Assessment (GTAA) has identified a need for an additional 13 pitches for the Gypsy and Traveller families already living in Monmouthshire.

2.3 Three Council-owned sites in Monmouthshire have been identified as potentially suitable to meet the current needs for the Gypsy and Traveller community:

- Oak Grove Farm, Crick
- Bradbury Farm in Crick
- Langley Close in Magor.

### Overview of consultation process

2.4 A six-week consultation was launched on 9th November 2023 seeking feedback from the community about the proposals. This is being run by Grasshopper Communications on MCC's behalf. The closing date for feedback was 22nd December 2023.

2.5 This consultation report and accompanying appendices provides an overview of the consultation undertaken and a summary of the feedback received and responses.

## 3. Background

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### Process of allocating Gypsy and Traveller sites

3.1 The process of allocating Gypsy and Traveller sites is a lengthy process and can take several years before sites can be developed. The following steps are currently being implemented and at each stage there will be public engagement:



### Council's Gypsy and Traveller Accommodation Assessment

3.2 The Council is required to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) every five years. This is a legal obligation under the Housing (Wales) Act 2014. The [Council's 2021 GTAA](#) identified the need for 13 pitches for families already living in Monmouthshire. Where a pitch need is identified, the Council is also required under the Housing (Wales) Act 2014 to meet that need.

3.3 The Council is required to allocate land to meet its housing needs, including the identified need for the Gypsy and Traveller sites in its Replacement Local Development Plan (LDP). The current LDP was adopted in 2014 and is now being reviewed. The preparation of the Replacement LDP 2018-2033 is now underway and will identify the proposed sites for Gypsy and Traveller communities.

### Identifying sites

3.4 Work commenced on considering the Council's broad approach to identifying land for Gypsy & Traveller pitch provision in 2018. But the more concentrated activity has taken place since the completion of the Gypsy and Traveller Assessment 2021.

- 3.5 The aim of the process has been to identify and shortlist parcels of land that are potentially suitable for providing Gypsy, Roma and Traveller pitches that will meet the Council's need, which the Council can then consult upon. Following consultation, a decision will be made on the most suitable sites, these sites will then be included in the Replacement Local Development Plan.
- 3.6 To help develop the Council's site identification process and to explain the Council's legal responsibilities, a schedule of both informal and formal meetings has taken place to capture the knowledge and views of local elected Council Members and to help inform the site identification process.
- 3.7 The Council's site identification process has reviewed and evaluated all of the Council's 1500 Council assets. The core of the site identification process was a broad five staged exercise to sift out/remove unsuitable land using site evaluation criteria, the aim being to identify a short-list of land with potential suitability for development as Gypsy, Roma and Traveller pitch provision, which would then be consulted upon.
- 3.8 This staged exercise to sift out unsuitable assets has been recorded and evidenced in a document, referred to as the [RAG document](#) (a spreadsheet that utilises a traffic-light system of red, amber and green to colour code evaluation findings and provide a more visual indication/overview). This staged process and the RAG document informed the original proposal on the Cabinet agenda on [26th July 2023](#).
- 3.9 Throughout this process, Council Officers have regularly consulted with Scrutiny Members on progress. Full details of these meetings can be found here:
- [Report to Joint Select Committee to scrutinise Gypsy and Traveller Assessment, 10/12/2020 10:00 \(monmouthshire.gov.uk\)](#)
  - [Report to Adults Select Committee to scrutinise site identification, 21/09/2021 10:00 \(monmouthshire.gov.uk\)](#)
  - [Report to Adult Select Committee to include process in forward work programme, participate in workshops, scrutinise methodology for evaluation, invite support from Travelling Ahead, 20/07/2022 10:00 \(monmouthshire.gov.uk\)](#)
  - [Report to Cabinet to approve and adopt Gypsy and Traveller Assessment, 06/01/2021 14:00 \(monmouthshire.gov.uk\)](#)
- 3.10 At the People Scrutiny Committee held on the 19th of July, the Committee was asked to consider the following recommendations from the [Report to People Scrutiny Committee 19th July 2023](#) to scrutinise proposal to consult on four sites and undertake investigative work on a fifth site.

The Scrutiny Committee made a recommendation to reject the four recommendations presented and to recommend that the Members put out a

public call to landowners to come forward with parcels of land, which is in line with recommendation 2.3 of the Cabinet report and that the selection process begin again.

3.11 The report put to [Cabinet 26th July 2023](#) recommended "the commencement of a consultation exercise to look at the following Council owned sites for the potential development of Gypsy and Traveller pitch provision namely:

- Manson Heights, Monmouth
- Rocklea, Mitchel Troy
- Garthi Close, Mitchel Troy
- Langley Close, Magor

Agree that further evaluation is undertaken on an additional piece of Council owned land, to further inform possible suitability and if applicable, (subject to findings) future consultation.

- Dancing Hill, Undy (west of Dancing Hill)

Agree to a 'call' for landowners who may wish to suggest parcels of land to come forward for consideration and further consultation."

The decision taken by Cabinet on 26th July 2023 was to "*Defer consideration of the report to allow officers to undertake further work.*" The then Cabinet Member also advised that three sites be removed from the site identification process due to unsuitability namely Manson Heights, Monmouth; Rocklea, Mitchel Troy Common and Garthi Close, Mitchel Troy Common.

In addition, officers were tasked with the following:

- Review site evaluation work and the RAG document;
- Incorporate and review Council owned candidate sites put forward for potential allocation in the RLDP for development [nine areas of land]. These were previously sifted out on the basis of the potential future development considerations;
- Invite the public to put potential land forward for consideration; and,
- Continue to seek to address need wherever possible on existing private Gypsy, Roma and Traveller sites subject to the necessary permissions.

3.12 Further to the Cabinet meeting of the 26th July 2023, the following work has taken place and conclusions drawn:

- a. The site identification RAG document has been reviewed by officers to ensure comments and RAG ratings are robust and consistent. The most recent version of the RAG document can be viewed [here](#). Given a combination of the known historic land contamination, possible noise

issues, access issues and location immediately adjacent to a Site of Importance for Nature Conservation (SINC), officers recommend that Dancing Hill West is removed from the process as alternatives are available.

- b. Officers have further reviewed Council owned 'Candidate sites' put forward for potential inclusion in the RLDP. These nine sites are now included in the most recent version of the RAG document.
- c. Following the 'Candidate' site review, two sites at the RLDP strategic Caldicot East site have been identified for up to 6 pitches each; one at Bradbury Farm and one at Oak Grove Farm.
- d. The 'public call' for sites was a positive exercise which resulted in 17 pieces of land being suggested for use. 14 of the sites put forward were discounted following the same approach as the sifting of MCC land or due to inadequate information to identify the location. Three suitable pieces of land have been assessed using the RAG. The Council has written to the owners of the three suitable sites to determine if there is any interest in selling or leasing this land to the Council.
- e. Discussions are ongoing with existing Monmouthshire households wishing to self-serve on existing sites, in respect of meeting their own need subject to the necessary permissions.

3.13 The outcome of this work and conclusions were reported to Cabinet on [4th October 2023](#) and informed a revised proposal to consult on three sites. It was agreed to start the public consultation exercise on three sites as well as including any suitable sites brought forward through the public call for sites, that the owner is willing to sell or lease long term to the Council.

3.14 The Cabinet decision was subject to a Call-in request which was considered by Place Scrutiny on 23rd October and referred to County Council on 26th October. County Council agreed to proceed with the consultation on the three identified sites.



## 4. Consultation tools

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- 4.1 The consultation on the emerging proposals took place between 9th November and 22nd December 2023.
- 4.2 A variety of consultation tools were used to encourage participation in the consultation from stakeholders and the local community which are set out below. This level of participation is consistent with the need for pitches identified by the Gypsy and Traveller Accommodation Assessment.

### Webpage

- 4.3 A webpage was set up to provide information about the consultation and included further information on the process of allocating Gypsy and Traveller sites, the Council's Gypsy and Traveller Accommodation Assessment, the proposed Gypsy and Traveller sites, consultation events, feedback mechanisms and contact details so local communities and stakeholders can find out more and comment on the emerging proposals:  
<https://www.monmouthshire.gov.uk/gypsy-roma-traveller-sites-consultation/>.
- 4.4 976 unique visitors accessed the website during this consultation process: 969 to the English version and 7 to the Welsh version. Overall, there were 1,557 total visits to the English page and 31 to the Welsh page (combined total of 1,589).

### Feedback form

- 4.5 An online feedback form was produced to gather feedback during the consultation. This was made available on project website at the start of the consultation at <https://www.monmouthshire.gov.uk/gypsy-roma-traveller-sites-consultation/>.
- 4.6 Hard copies were available at the face-to-face events and returned to the Caldicot Hub (located in Caldicot Library, Woodstock Way, Caldicot, NP 26 5DB); or posted to Housing & Communities, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. A copy of the feedback form is attached at **Appendix 2**.

### Media release

- 4.7 A media release was sent to local media to introduce the project and publicise the consultation on 8 November. It was released two days earlier than the consultation launch to coincide with the South Wales Argus's weekly printing date (see **Appendix 3**).
- 4.8 Press coverage during the consultation included:

Date	Paper	Headline and link
7/11/23	Monmouthshire Council	<a href="#">Gypsy and Traveller pitches in Monmouthshire</a>
9/11/23	News, Wales	<a href="#">Drop-in sessions organised by Monmouthshire County Council to discuss Gypsy Traveller site plans</a>
9/11/23	Monmouthshire Beacon	<a href="#">Proposed Monmouthshire gypsy pitches up for consultation</a>
9/11/23	Herald Wales	<a href="#">MONMOUTHSHIRE: Gypsy consultation events</a>
12/12/23	South Wales Argus	<a href="#">Monmouthshire Gypsy Traveller sites consultation deadline</a>
12/12/23	Nation Cymru	<a href="#">Gypsy traveller site consultation deadline looms</a>
12/12/23	News.Wales	<a href="#">Residents urged to have their say on potential gypsy traveller sites in Monmouthshire</a>
14/12/23	The Forest of Dean and Wye Valley Review	<a href="#">Drop-in day deadline for Monmouthshire gypsy site consultation</a>

## Poster

4.9 An A4 poster was displayed locally, to advertise the events (see **Appendix 4**).

## Social media toolkit

4.10 A social media toolkit was prepared (refer to **Appendix 5**) to help raise awareness of the project and publicise the consultation events and how to give feedback. It was issued to Monmouthshire County Council to use on its Facebook and Twitter/X pages channels.

4.11 Combined, in total, these posts reached 33,683 users and were engaged with 90 times (29 reactions, 2 comments and 59 shares).

## Travelling Ahead

4.12 The consultation was promoted by Travelling Ahead in a number of ways. This included promoting it through Travelling Ahead's Facebook and Twitter social media accounts. Travelling Ahead also made contact directly with members of their network including members of the Gypsy & Traveller community and specific agencies. Travelling Ahead's engagement with the Gypsy & Traveller Community involved taking consultation documents to people's homes.

## Other

4.13 Outside of the Council's mechanisms it is also known that the consultation was informally promoted by some of the Council's elected members through their own networks, detailing how residents can get involved and reminders of deadlines and meeting dates.

## Drop in events

4.14 The purpose of the drop in events was to give the local community an opportunity to discuss the project with the project team and raise any concerns they may have.

4.15 The following drop in events took place:

Date	Time	Venue	Number of attendees
<b>Wednesday 22nd November 2023</b>	4pm to 7pm	Portskewett Church Hall, Portskewett, NP26 5UL	117
<b>Thursday 23rd November 2023</b>	4pm to 7pm	Magor and Undy Hub, Main Road, Caldicot, NP26 3GD	88

4.16 Portskewett Church Hall and Magor and Undy Hub were chosen because they were geographically very close to the proposed sites. The halls were large which enabled everyone who attended to view the exhibition materials with ease. They also had good disabled access, adequate public transport links, and free parking onsite or on road.

4.17 There were nine English and nine Welsh exhibition boards with the following information:

- **Welcome** – Introducing attendees to the drop-in event and contact information is provided.
- **Process** – Explaining the GTAA and proposed next steps after this consultation period.
- **Site map** – Pinpointing the location of the three proposed sites in one map. It also clearly indicates the location of the proposed land submitted for RLDP Caldicot East.
- **Feedback** – Showing ways of providing feedback during this consultation process.
- **Profile: Langley Close** – Describing the Langley Close site, including site size and pitch capacity.
- **Profile: Oak Grove Farm** – Describing the Oak Grove Farm site, including site size and pitch capacity.
- **Profile: Bradbury Farm** – Describing the Bradbury Farm site, including site size and pitch capacity.
- **Vision** – Highlighting the Council's moral and legal duty to meet the pitch needs for Gypsy and Traveller communities in Monmouthshire.
- **Key documents for download** – Showing QR codes of RAG, the Gypsy and Traveller Assessment, Welsh Government guidance and planning, frequently asked questions, and the consultation website.

4.18 The boards were produced and displayed in English and Welsh at each of the venues and were available to download as a PDF from the project website from the day of the first drop-in event. The exhibition boards are attached as **Appendix 6**.

## Targeted Gypsy and Traveller drop-in event

4.19 A further drop-in event targeting the Gypsy and Traveller community was held to provide a safe space to support their engagement in the process and ask questions specific to their needs.

Date	Time	Venue	Attendees
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<b>Tuesday 5th December 2023*</b>	4pm to 7pm	Monmouthshire County Council, County Hall, Rhadyr, Usk, NP15 1GA	3
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4.20 Three individuals attended the event at County Hall, of which one was a known member of the local Gypsy and Traveller community who represented a number of households. Travelling Ahead also directly engaged with the Gypsy and Traveller community about the consultation and encouraged participation.

4.21 It is recognised that engagement with the Gypsy & Traveller community can be difficult because members of the community may not feel confident nor comfortable participating, possibly in part due to a lack of trust. It is equally recognised that building trust and relationships necessary for effective engagement can take time. In addition, the fact that the known Gypsy & Traveller community in Monmouthshire is very small will also be of relevance. The Council is keen to continue engaging and developing relationships with the Gypsy & Traveller community.

4.22 It is Travelling Ahead's view that the low participation is absolutely no reflection of the lack of need for land to be identified for meeting future pitch need.

## 5. Feedback summary

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### Drop in events

5.1 A total of 206 residents and stakeholders attended the three drop in events:

Date	Venue	Attendees
<b>Wednesday 22nd November 2023</b>	Portskewett Church Hall	117
<b>Thursday 23rd November 2023</b>	Magor and Undy Hub	88
<b>Tuesday 5th December 2023</b>	County Hall, Usk	3
<b>Total</b>		<b>208</b>

5.2 The summary of the feedback received at these events is provided in section 6 of this report.

### Emails / telephone enquiries

5.3 A total of **17 emails** were received during the non-statutory consultation with:

- 12 of these were emails from local residents, to which their feedback is embedded into the survey responses in section 9 of this report.
- Five of these were received from elected representatives, feedback is summarised in section 7.
- A number of photographs and one video were submitted by email to illustrate certain comments made.

5.4 **Two telephone** enquiries were received.

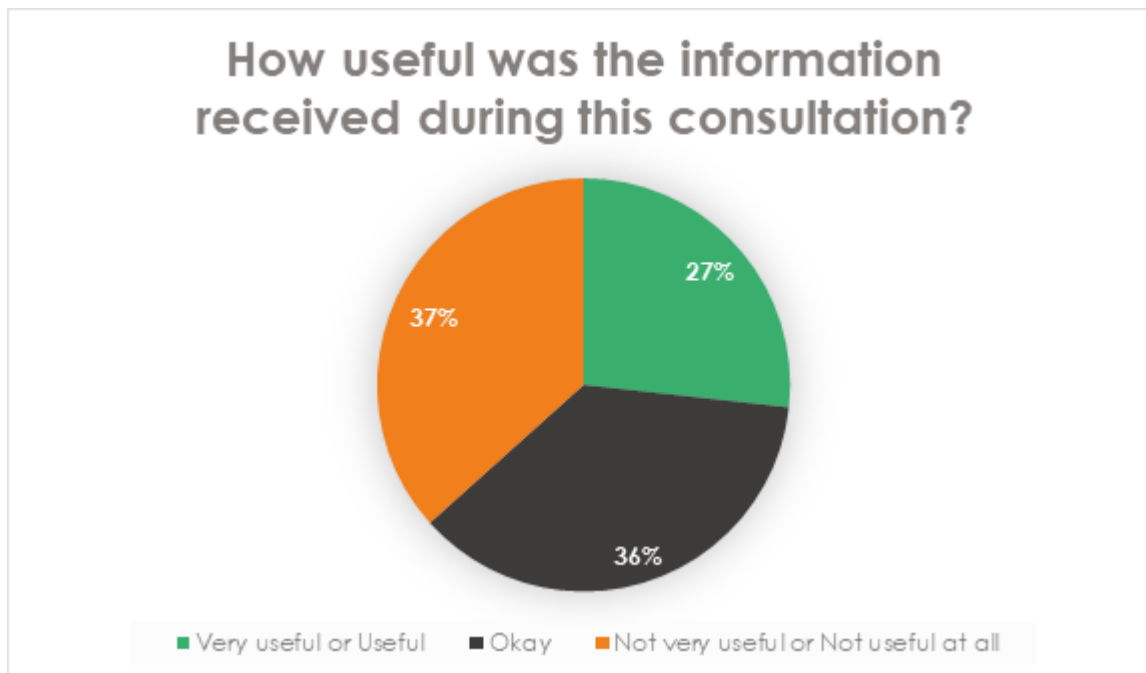
### Feedback forms

5.5 During the consultation, **389 feedback forms** were completed online or returned using the freepost address, two of which were in the Welsh language. Forms that were sent originally by email were later submitted online and form part of the 389 figure. Of these:

- 338 provided feedback on Langley Close.
- 243 provided feedback on Bradbury Farm.

- 232 provided feedback on Oak Grove Farm.
- 223 provided additional comments regarding all three sites.
- 282 provided feedback on Monmouthshire County Council's vision.
- 220 provided additional comments about the consultation.

5.6 A total of 374 of the 389 people responded to the question “How useful was the information received during this consultation?”. Of those that responded, 27% found the information ‘very useful’ or ‘useful’ while 37% either found it ‘not very useful’ or ‘not useful at all’:



## E-Petitions

5.7 Three e-petitions were submitted by members of the general public, one was prior to the consultation period while the other two were submitted during the consultation period. One of the e-petitions was rejected because it contained intemperate, inflammatory, abusive, or provocative language so has not been included in this report.

5.8 **Petition 1 (before consultation): Save our Green Open Areas** ‘We the undersigned petition the Monmouthshire County Council to acknowledge the result of the scrutiny committee and to withdraw the proposals to develop both the Langley Close and Dancing Hill sites due to their unsuitability and the further loss of the limited remaining ecologically rich green areas within our village and community.’ **1,256 people signed this petition.**

5.9 **Petition 2: Protecting Open Space** ‘We the undersigned believe the two sites proposed are unsuitable for development of any kind, including as sites for the gypsy traveller community and we call on the County Council to withdraw them.’ **678 people signed this e-petition.**

# 6. Feedback from drop in events

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6.1 The key issues raised during the drop in events were:

## Event one: Portskewett Church Hall

1. **Location of Oak Grove** – Attendees raised various issues in relation to the proposed Oak Grove Gypsy and Traveller site including:
  - Traffic speed is too fast and accidents or near misses are considered common.
  - The site is too windy for caravans.
  - Concerns that the reflected heat from the solar panels will be intolerable.
  - Poor accessibility relating to lack of pavements and street-lighting.
2. **Location of Bradbury Farm** – People raised various issues in relation to the proposed Bradbury Farm Gypsy and Traveller site including:
  - The site is located on an S bend making access potentially dangerous.
3. **Road safety** – Some attendees highlighted that Oakgrove and Bradbury Farms are located on roads with the national speed limit (60mph), making it potentially unsafe for those living there. Some stated that the amount of traffic on the roads is likely to increase with new developments e.g. MOD and Treetops.
4. **Overdevelopment** – Some attendees stated that there are a couple of significant housing developments in the Crick/Portskewett area; one that is near completion while the other is yet to be submitted for planning permission. They raised concerns about too much development in southern part of Monmouthshire and the potential impact of these developments on local infrastructure and community services (roads, public transport, schools, dentists, doctors etc).
5. **Providing homes for all** – Queries were raised about why provision is being made for the Gypsy and Traveller community, when there is a housing crisis for all with many young people not being able to access housing in the area. They felt more should be done to shorten the current waiting list for social housing and there should be greater provision for homeless people in Monmouthshire.
6. **Views about Gypsy and Traveller communities** – In those few cases where the views expressed were discriminatory in nature, they have been discounted.
7. **Consistency of planning decisions** – The proposal for the Gypsy and Traveller sites is inconsistent with previous planning decisions for housing development which had been refused. There was a query as to why these sites would be considered suitable for this type of accommodation.



8. **Site names** – Bradbury Farm, according to some of the residents, is named inaccurately as it is further down that road which is causing some confusion.
9. **Management of sites** - Some views and comments were received about a risk of possible site management implications, for example, unauthorised use. Queries were also received about whether rent would be charged to utilise the site. In those few cases where the views expressed were discriminatory in nature, they have been discounted.
10. **Property values** – Some residents were concerned about the impact on their property values if a Gypsy and Traveller site was located in the area. One attendee had been advised by an estate agent that their property value has been affected and people are declining to view because of the possibility and uncertainty regarding a potential Gypsy and Traveller site.
11. **Cost of sites** – There were queries around who would be paying for the development of the sites.
12. **Other local Gypsy and Traveller sites** – Some attendees made comments about a privately owned site in the County, speculating that appropriate planning approvals were not in place. They felt Monmouthshire County Council is not dealing with it effectively.
13. **Loss of agricultural land** – Concerns were raised about loss of agricultural land and the impact on the local food supply.
14. **Consultation feedback** – Attendees raised that the link to the on-line feedback form wasn't working.
15. **Cost of consultation** – Queries were raised about the cost of the consultation.
16. **Other issues** – Some who attended used the event raised other issues not related to the Gypsy and Traveller consultation including complaints about the Welsh Government policy to introduce a 20mph speed limits in residential areas.

## Event two: Magor and Undy Hub

1. **Location of Langley Close** – People raised various issues in relation to the proposed Gypsy and Traveller site behind Langley Close including:
  - Noise levels (being in close proximity to the M4). They raised the fact that properties near the M4 have received compensation and have had triple glazing is an indication that Langley Close is an inappropriate location for mobile homes.

- Light pollution and privacy issues impacting on properties.
  - Too close to residents (some identified that they thought it was a requirement/preference that Gypsy and Traveller communities for sites should not be close to other residential properties).
  - Poor accessibility stating that part of the road is very narrow and there is no footpath. St Brides Road is a blind bend and is a narrow road through a residential area which would be inappropriate for regular large vehicles, Lorries already get stuck there. See **Appendix 7** for photos.
  - Attendees felt that the site is not urban.
  - Issue of highway flooding – see **Appendix 7** for photos.
2. **Traffic impacts** – Attendees raised that the increase in traffic is a concern which is further compounded by the current development of the Andrews logistics depot, Magor.
  3. **Overdevelopment** – Concerns were raised about too much development in this part of Monmouthshire and the potential impact of these developments on local infrastructure, community services (roads, public transport, schools, dentists, doctors etc). These close-knit communities fear their loss of community identity.
  4. **Lack of green space in Magor** - Attendees raised the lack of community sports facilities as well as lack of dog walking areas locally.
  5. **Property values** – Some residents were concerned about the impact on their property values if a Gypsy and Traveller site was located at Langley Close.
  6. **Council risk of litigation** – Some residents claimed if the site was developed, the Council would be at risk of litigation due to the issue of pollution.
  7. **Process** – There were perceptions that the proposed sites were a ‘done deal’ and a decision about allocating the sites had already been made. Some attendees felt that completing the feedback surveys alongside the consultation was too late to inform the consultation.
  8. **Consultation publicity** – People raised concerns that the consultation had not been promoted adequately. Some residents in and around Langley Close were not happy about the promotion of the consultation, some of whom were informed of this event a lot later than others. Many had not seen the press release and did not use social media. They had not seen posters or received any newsletter. Many had only heard of the consultation through word of mouth.
  9. **Views about Gypsy and Traveller communities** – There were a number of discriminatory views expressed through the events. These comments have not been included and have been discounted.

10. **Proposed timeline** – Some expressed surprise about how long it can take for the sites to be built, should they be approved.

### **Event three: Monmouthshire County Hall**

The household attending this drop-in was supported by Travelling Ahead. The household verbally advised that they welcomed that the Council was seeking to identify sites for Gypsy & Traveller households.

# 7. Feedback from key stakeholders

## Elected representative responses

7.1 Responses were provided by the following elected representatives:

Name	Role	Medium of response	Feedback received
<p><b>David TC Davies MP</b> MP for Monmouth</p> <p><b>Email</b></p>	<p>There is a great deal of local concern about the suitability of the three sites in question. Langley Close, which is next to the M4, has been questioned by both the public and councillors about the health impacts of potential air pollution. It is also very close to existing homes. Indeed, feedback from the gypsy traveller community was they did not wish to be sited in close proximity to built-up areas.</p> <p>Although the other two sites are identified as being in Crick, the proposed Bradbury Farm site will be located on the northern perimeter of the farm in the Portskewett ward – while the Oak Grove Farm site is situated on land alongside Severn Farm in Leechpool, Portskewett. The council has said the gypsy traveller sites need to accommodate a combined total of 13 pitches and that a pitch is around 320 square metres, so 13 pitches across the entire county requires just over an acre of land. The county has 200,000 acres, yet the only sites deemed “suitable” are all within the Severnside area.</p> <p>The council's own scrutiny committee recommended going back to the drawing board following a review of previously earmarked land, which saw sites dropped at Mitchel Troy Common and Manson Heights in Monmouth. But instead, two new sites have been identified in Portskewett. I am doubtful that any officers or cabinet members have visited either of the sites as the one referred to as Oakgrove</p>		
	<p>Farm in Crick is 2.4 miles away from Oakgrove Farm in Caerwent. Incorrectly identifying Portskewett ward as Caldicot East is misleading. If the council cannot accurately pinpoint a site location,</p>		

	<p>it raises questions as to whether a thorough assessment has been carried out.</p> <p>In the Severnside corner of Monmouthshire, there are already well-founded overdevelopment concerns. An area the local authority has dubbed Caldicot East, which also encompasses the adjoining village of Portskewett, could see up to 2,609 new homes built by 2033. The sites proposed at Bradbury Farm and Oak Grove Farm are inappropriate due to the volume of houses that have already been built and the 750 to 1,400 houses Portskewett could be allocated in the future, risking its identity as a village. It is all too much in an area that is becoming overdeveloped.</p> <p>Finally, I echo local road safety fears. The two locations in Portskewett are located on 50mph roads with blind bends. The B4245 is dangerous to pull out on, let alone walk along. I do not believe they are suitable for the gypsy traveller community or for development of any kind. There are no safe routes to access local amenities and children will not be able to safely walk to school.</p>
<p><b>Peter Fox</b> <b>MS</b></p> <p>MS for Monmouth</p> <p><b>Feedback form</b></p>	<p><b>On the vision:</b> As a recent, long-standing Leader of Monmouthshire County Council I understand well the need for the council to have a clear vision and aspirations for the Gypsy &amp; Traveller community. As in recent past, small sites would seem to be most suitable. Of course, as with any development they should be well designed, fit in with the landscape and surrounds, and be subject to the same planning and development conditions as required for any other development that would be applied for though the planning system. What is important is that proposed sites should be genuinely considered from the Gypsy &amp; Traveller perspective as well as from the settled community perspective. The convenience of the council, i.e. utilising their own land holdings should not be the driver for proposed site selection albeit I can see why the council may see that utilising their own land would be convenient and desirable.</p>
	<p><b>On Langley Close's advantages:</b> This site isn't in my constituency however as a past MCC councillor I know it relatively well. There are few, advantages of this site. I feel it has been put forward due to it being a spare piece of land that is conveniently located on the boundaries of the village of Magor and as such would have access to local facilities such as schools, village centre etc. This rationale may carry some merit however I would argue that should those factors be the driver over the wider needs of gypsy traveller families? The</p>

convenience of the location should be very much a secondary consideration and should not cloud the view of decision makers.

**On Langley Close's disadvantages:** This site isn't in my constituency, but I know it relatively well from my past councillor role. The site is located very close to several established residential houses. For sufficient space to ensure both the Gypsy and Traveller community and the local residents to have their respective privacy, it would seem that proposed area of the site would require the pitches to be located very near to the motorway, one would have to ask if this would be fair to the Gypsy / Traveller families? They would be located to such a potentially undesirable spot with additional noise and pollution and possible safety concerns. Would the planning system view a proposed, western position of the site, indeed any of the site, being in such close proximity to a motorway and subject to the concerns I raised? Would it be seen as suitable for permanent residential use? I feel the site would almost traps any new gypsy and traveller families between the motorway and settled homes, forcing the two communities together which I doubt would be desirable by either.

**On Bradbury Farm's advantages:** The site is located close to surrounding villages and Caldicot and it is accessible.

**On Bradbury Farm's disadvantages:** This site would be highly visible from Crick Road it is a relatively exposed site there would be no safe walking routes to the local amenities or schools. Crick Road is a busy road as it links the A48 to the B4245 and is used as heavily by traffic. Indeed, I would not walk myself along that stretch and certainly would not want children to try walk it. Safe walking routes should be a fundamental consideration for any new development and that should include for our Gypsy Traveller sites. Again, I feel the perceived convenience of this site by decision makers has allowed this site to come forward without deeper consideration. I was also surprised to see the council bring this site forward recognising an accepted position agreed by both the gypsy and traveller community and the planning authority where it is seen that gypsy and traveller sites should not be located closely to settled communities. I state this as the MCC proposed Local Development Plan has identified large areas of land, adjacent to this site for large scale new housing developments. Clearly if these proposals are seen as sound in a final LDP and are developed I would ask how would this proposed site be conducive with the wider residential aspirations of the council? There seems to have been little consideration of this conflict in policy. The location of a gypsy traveller site here could jeopardise future development and vice versa.

**On Oak Grove Farm's advantages:** Firstly, this proposed site is not part of Oak Grove farm, it is situated as part of what was Severn Farm and now farmed by the tenants of Parkwall Farm. I was the County Councillor covering this area for some 25 years and I can hand on heart say this site has absolutely no strengths or advantages. The only thing I can see that might have made it desirable was that it has an established gateway, again I sadly have to state that I feel that this site was put forward due to that simple fact which isn't a deep enough rationale for something so important.

**On Oak Grove Farm's disadvantages:** As previously stated I know this site exceptionally well as was the county councillor for the ward for 25 years, I was also on the community council for a similar time. I was amazed to see this proposed site coming forward and can only assume it was chosen as it has a convenient gateway that is set back from the B4245. If that gateway wasn't there this site would just be another field like the hundreds of others in the area that border roads such as the A48 or in this case the B4245 but haven't been considered. I strongly believe that there should be a far stronger rationale to bring a site forward other than in this case a convenient access. The reasons I believe this site is so wrong are firstly based on safety. I would argue that the B4245 is one of the busiest roads in Monmouthshire. As local housing developments have been delivered along Severnside we have seen a huge increase in traffic volume. The B4245 is used not only by cars but large volumes of heavy goods vehicles who use it to access local industry sites. Indeed, the traffic has got so bad it has become extremely dangerous for existing residents to access the road from their own residential drives. Over many years I have witnessed a vast number of accidents and near misses. The community council and I as a past local member have lobbied for reduced speed to prevent accidents, but to no avail, yet traffic now is increasing exponentially. To locate any further residence, either Gypsy Traveller, or regular residential, would be madness. To require gypsy traveller families to live there would be so unfair on them. The danger for them and especially their children would be significant. I genuinely believe that regular access from the proposed site onto the B4245 would result in the loss of life at some point and should be resisted at all cost. I say this as a local resident myself who knows well what conditions are like there and who has seen things get worse. There are also no safe walking routes along the B4245 to enable children and parents to access local schools and facilities. All new residential developments of any nature should have appropriate pedestrian access. Aside from my main concerns about the safety of the site, it would also be very exposed and would be highly visible from both, the A48 and the B4245. In planning terms, I believe this site would be totally

	<p>unacceptable on so many grounds that I'm surprised political leaders brought it forward.</p> <p><b>Further comments:</b> As a local Senedd Member and a past Council Leader and long-standing councillor. I have been disappointed to see how the county council's Cabinet has gone about conducting this process and choosing potential sites. Initially there was a lack of consultation albeit it these latter stages lessons seem to have been learnt and there has been engagement. I strongly believe that the needs and desires of the Gypsy and Traveller have not been thought out properly and that decision makers have been driven to bring forward their proposals due to other factors such as availability of their own land and superficial considerations such as convenient access opportunities. It seems little consideration, certainly on two of the sites, has been given to children safety, safe walking routes and future planning considerations. I would also point out that little consideration has been given to the already approved Gypsy Traveller sites, or those in long term use such as Usk or Llancayo. How should these be viewed in terms of the Gypsy and Traveller needs assessment? If they haven't been included in the overall Gypsy and Traveller considerations should they be?</p>
<p><b>Natasha Asghar MS</b></p> <p>Regional MS for South Wales East</p> <p><b>Email</b></p>	<p>Natasha believes that there does need to be housing somewhere and that everyone deserves a place to live.</p> <p>It is vital all residents are consulted and inform their local Councillors of their views. Ultimately Monmouthshire should be a safe and lovely place to live for everybody. Natasha is sure that with the opinions of residents heard, the Council will make the right decision.</p>
<p><b>Cllr Frances Taylor</b></p> <p>Councillor for Magor West</p> <p><b>Email</b></p>	<p><b>Introduction</b></p> <p>I would like to formally submit my consultation response in respect of the Gypsy Traveller Pitch Provision for both Langley Close and Dancing Hill. I am aware that Cabinet has currently ruled Dancing Hill out as per paragraph 3.9 of the cabinet report of 4<sup>th</sup> October 2023.</p> <p>3.9 Given a combination of the known historic land contamination, possible noise issues, access issues and location immediately adjacent to a Site of Importance for Nature Conservation (SINC), officers recommend that Dancing Hill West is removed from the process as alternatives are available.</p> <p><b>General comment on Magor with Undy</b></p>



Magor with Undy has just been designated a Town in the boundary changes. This is for no other reason than the disproportionate growth Magor with Undy has seen. In the 1980's /90's Magor with Undy was one of the fastest growing settlements in Europe. However, little or no regard was paid to creating sustainable, connected communities. There is no civic footprint in respect of libraries, leisure provision, tourist information, civic buildings etc.

There is a general feeling in the community that Monmouthshire Council and its predecessor councils has not sought protect and enhance its natural and historic assets such as outdoor amenity space, Wilcrick Hill Fort, Medieval Orchard, Mill Common's ancient woodland and the Gwent Levels and the SSSI's to name but a few important features.

### Process

I believe that both sites are unsuitable and would request that this is acknowledged. However, the fact that Cabinet further ruled out the Dancing Hill site, whilst the right decision provides further evidence that the process has been flawed from the outset. This is because all the facts that ruled 4 of the 5 sites out were known at the outset.

Therefore, how can one have confidence in a process which would serve up 5 sites and then rule 4 of them out without any further investigation?

For the record, I have repeatedly made representations concerning the process which Monmouthshire Council has followed. I continue to believe that process is flawed and not fit for purpose. In Pre-decision scrutiny, the People Scrutiny committee of 19<sup>th</sup> July, supported Option 3, not to recommend any of the sites to Cabinet to be formally consulted upon but instead to recommend that Cabinet returns to the drawing board. The Council proposed 5 pieces of land for consultation in July. Of the 5 pieces of land proposed all were rejected by scrutiny. Cllr Jackie Strong, Labour member and vice chair of the People select committee described the proposals as "a pig in a poke".

If the process was robust, accurate and objective – why have four of the five original sites been ruled out? I feel that this provides further evidence that the original process is irrevocably flawed.

However, the Cabinet's attachment to these sites and unwillingness to consider the evidence base has served to undermine confidence in the process and also in the wider RLDP.

There were and still appear to be inaccuracies, inconsistencies and erroneous information in the site assessment and RAG process.

### **Initial Inaccuracies and Inconsistencies**

The report advises that at stages 1, 2 and 3 land was removed where it was,

- Covered by a ground lease – Langley Close is currently leased/licensed.
- County Farm Holdings- both Langley Close and Dancing Hill are County Farm Holdings
- Woodland areas – Both Langley Close and Dancing hill are bounded by wooded areas and adjacent to what we understand to be ancient woodland
- Within and adjacent to conservation areas - Both Langley Close and Dancing hill are adjacent to Magor Conservation area.
- Enclosed/surrounded by built environment and amenity/placemaking – Both Langley Close and Dancing hill are enclosed and surrounded by the built environment and amenity space. It is axiomatic that matters of privacy and amenity would be significant factors for all parties. Magor Town Council along with the Council are embarking on placemaking plans which include considerations of amenity space and active travel corridors.
- National ecological designations/Landscape designation – Both Langley Close and Dancing hill are within 70 m of a SINC and are within 500m of Landevenny and Redwick SSSI
- Listed Buildings – Langley close is bounded by Woodland House to the Western Boundary. Woodland House, the former Vicarage is a Grade 2 listed building designed by the same architect as Tyntesfield, the National Trust Property (John Norton). The building is habitat for known protected species and this was documented during the M4 public inquiry.
- Proximity to “bad neighbours” – The sites are in placed within 25 -50 Metres of the M4
- Access - Access, St. Brides Road is a national speed limit road which is single track and now much more heavily trafficked

due to the 20 MPH. It is also unsuitable for HGV's. The Highway assessment advises that the current access is unsuitable, and the size and scale of development will have a significant impact on the safety and capacity of the immediate local network and that the existing access is unsuitable. A new access would result in significant loss of the ancient boundary hedge.

- Mineral Safeguarding – Langley close is a Mineral Safeguarding area.
- Designated amenity space - Both Langley Close and Dancing hill contain designated amenity space, which is vital to the communities of Magor with Undy.
- Greenfield - Langley Close is considered a greenfield site in the officer assessment – it was only recently drawn to officer attention that this may require some investigation of the land due to proximity to the M4 and historic potential for tipping during its construction. Dancing hill is believed to formerly be a landfill site and will it seems require some potentially significant investigation.

In general site descriptions remain poor and inaccurate with arbitrary detail. Similar features are not described consistently. For example, Langley close only makes mention of properties on the Southern Boundaries but as above, it is bounded to the north west by Grade 2 listed Woodland House, to the south west by Langley Close and Newport Road and to the east by St. Brides Road and Langley Villa and to the North by an oversection of the M4 and slip roads for Junction 23.

During the scrutiny committee, officers did offer the view that there is an inherent level of subjectivity in the descriptions and argued that no site is perfect. However, I would suggest that there are many factors associated with these (and the other sites) which are not a matter of interpretation or subjectivity or indeed balance. For example, the site is either bounded by properties or it is not. There is either a listed building in close proximity or there is not. These are not a matter of subjective interpretation but a matter of fact.

- GI and Ecology. One small example is that other sites recognise clear GI features, e.g. bounded by native species hedgerow and that to create a suitable visibility splay would require removal of existing hedgerow and trees – in some sites this is RAG rated green and in others red.
- Despite recognising the potential for protected species, the proximity from the SINC and the SSSI and the adjacent site

DES 2 as recognised as priority grassland, the ecological features of the sites do not seem adequately described in the assessment.

The site descriptions seem to lack detailed local knowledge and the RAG Rating Framework seems subjective, arbitrary and has been inconsistently applied. Additionally, Gypsy and Traveller Family comments appear to suggest that none of the sites under consideration are helpful, in respect particularly of proximity to existing built environment.

In the report pack it is advised that the workshop on 4th July 2023 'considered 9 remaining sites and whether to leave in process and recommend consulting on possible development or remove from process.' No recommendation is in the agenda but somewhere, either in this meeting or afterwards, 4 have been removed and only 5 sites are being presented at the People's Scrutiny Committee. This member workshop appears to have been used to "filter out" sites, where members were asked for their views. Members will not necessarily have the local knowledge necessary to fully appraise sites and as above the information on each site seemed inconsistent and arbitrary.

Equally, member workshops are in my experience only ever used as a means of providing members with information, training and knowledge and sometimes seeking member feedback. They are not decision-making fora and this does not accord with my understanding of Monmouthshire Council's constitution. Just preceding the workshop on 4<sup>th</sup> July is the first-time members have received any documentation. Officers confirmed this at the scrutiny meeting.

### **Deficit in Outdoor Space**

Magor with Undy has a significant deficit in outdoor space. I raised particular concern about the Langley Close site. Over the past 7 years I have been at pains to get the council to firstly identify Council owned sites in Magor with Undy which could be considered in particular for outdoor formal sport provision. I have been working with officers and local sport groups to persuade the Council to allocate land for recreation and outdoor sport. In the end, there were only 3 flat, drained sizeable sites in the Council's ownership in Magor with Undy, which were thought to be possible for consideration. Langley close was one of the sites. I visited the site with the Council's Community Infrastructure Co-ordinator when we were considering options. At the time the land was not tenanted. I have been working with Magor Rugby club to make a change of use application on one of the other identified sites at Knollbury, the

Rose Cottage site. The Rose Cottage site was selected in preference because it is larger.

It is my firm belief that as there are no other identified drained land in council ownership which is large enough for outdoor recreation and formal sport provision, the Langley close site should not be lost to any other uses – whatever they might be.

I have also been approached by Undy AFC as they are saturated and cannot take other young players without further pitch allocation. Yet Undy AFC has growing demand in new player interest from our expanding local population. Undy is fortunate to have a well-engaged & enthusiastic volunteer capacity, and also a good governance structure. Undy AFC has achieved FAW's platinum accreditation for the club, which is the highest level possible for a grassroots club. The club has 350 junior players, male & female, making Undy one of the biggest clubs in the region. There are 7 senior teams, including 2 women's teams. The age range of players at the club is 2 to over 60, and the club would love to be able to do more but are now limited by pitch space. Undy is doing great things with the ongoing growth of female football, but still only have room for 4 girls' teams, when the mixed/boys teams are currently numbering 15 - they still have some way to go. Undy also other local community sporting groups, but again these are limited due to capacity.

<b>Typology</b>	<b>Current level of provision (hectares per 1000 people)</b>	<b>Current level of provision (hectares)</b>	<b>Standard per 1000 population (hectares)</b>	<b>Open space required to meet standard (hectares)</b>	<b>Surplus or deficiency (hectares)</b>
Public open space	0.37	2.25	0.4	2.44	0.19 (deficiency)
Outdoor sport	0.64	3.92	1.6	9.75	5.83 (deficiency)
Natural and semi-natural green space	2.72	16.58	2.0	12.18	4.40 (surplus)

Equipped play spaces	0.09	0.57	0.3	1.82	1.25 (deficiency)
Informal play spaces	0.37	2.25	0.5	3.05	0.80 (deficiency)
Allotments	0.07	0.40	0.25	1.52	1.12 (deficiency)

The Town Council MUGA (formerly tennis courts) is saturated, and council has considered (and applied for via the Council's Community Infrastructure co-ordinator) funding for further court provision to meet the needs and desires of the community.

The Ashley Godfrey open spaces report from 2008, prepared as a support document for the current LDP – and below is the surplus/deficiency table of provision. The slight inaccuracy of this relates to allotments - only the Greenmoor Lane and Sycamore Terrace allotments were included and there are allotments in Undy which will bring us closer to sufficiency in pure standard per 1000 population terms. However, at the time of writing, the Town Council has 50 people on a waiting list for an allotment.

There is a current deficiency of 5.83 hectares (14.41 acres) of Outdoor Sports provision when the standard of 1.6 hectares per 1000 population is applied.

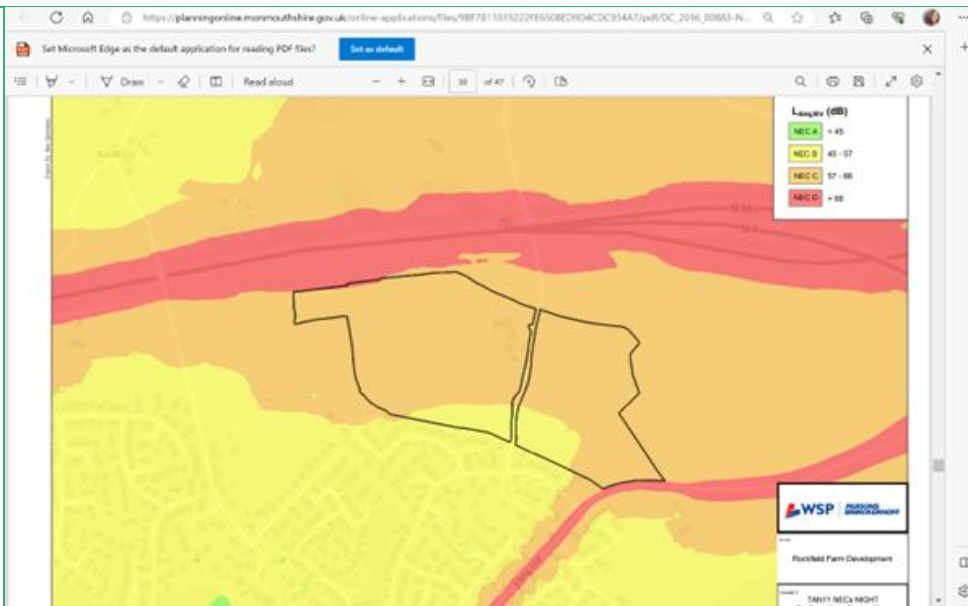
Current provision amounts to 3.92 hectares compared to a requirement of 9.75 hectares.

The Rose Cottage site measures 4.52 hectares so, if and when this site is brought into use for outdoor sports provision, it will reduce the deficit to 1.31 hectares.

The Langley Close site measures 2.34 hectares and ought to be retained as farmland with the option to use in the future for open space use and in particular outdoor sport.

There have been several completions on Rockfield Farm and Vinegar Hill which were not reflected in the census date. There are many further completions due at Rockfield Farm and Vinegar Hill. There are also further residential candidate sites in the new Replacement LDP, and consideration must be given to population growth and the needs of future generations.

### **Further material planning considerations**



### Noise Pollution

Both sites are adjacent to the M4 motorway and raised slip road to Junction 23A. According to the Dept for Transport, traffic has increased by 21% since the tolls were abolished in 2018 (actual counts).

Noise pollution is a key concern and going back to the noise studies for Rockfield Farm for comparison, I anticipate they are similar if not worse. You will note that most of Rockfield Farm fall into NEC category C (TAN 11).

NEC C - Planning permission should not normally be granted. Where it is considered that permission should be granted, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.

Below are night-time noise levels from a study conducted for the Rockfield Farm Masterplan in 2016.

As above, planning permission ought generally not be granted. Traffic levels have grown exponentially. and the matter worsened. One anticipates that this pattern is replicated at Dancing Hill. It is likely worse at Langley close where the M4 is raised and there are also the on and off slips for Junction 23.

- **Pollution and Contamination**

It is noted that the Dancing Hill site is a potential Landfill site. Additionally, it is true to say that many sites alongside the M4 are potentially contaminated with unregulated tipping carried out

during construction works during the 1960's. Both sites would need appropriate testing.

Air pollution levels are extremely high as shown by the National Atmospheric Emissions Inventory, below.

The current greenfield sites at Langley Close and Dancing Hill provides a buffer between the M4 and current residential areas. This attenuates some of the noxious air pollution. Equally, Welsh Government Document, 'Designing Gypsy and Traveller Sites May 2015', para 3.21 states: *'If a location is considered inappropriate for conventional housing use, on the grounds of health and safety, then it should also be considered inappropriate for a Gypsy and Traveller site. A Gypsy and Traveller site should not be located in areas which will have a detrimental effect on the general health and well-being of the residents.'*

#### AIR POLLUTANTS

DATA RETRIEVED FROM THE NATIONAL ATMOSPHERIC EMISSIONS INVENTORY (NAEI) WEB SITE. PART FUNDED BY THE WELSH GOVERNMENT.

THE NAEI COMPILES ESTIMATES OF EMISSIONS TO THE ATMOSPHERE FROM UK SOURCES SUCH AS CARS, TRUCKS, POWER STATIONS AND INDUSTRIAL PLANTS. THE FOLLOWING HAZARDOUS AIR POLLUTANTS ARE ALL IN THE RED CATEGORY IN THE AREA BETWEEN JUNCTION 23A AND LANGLEY CLOSE:

- ARSENIC
- CADMIUM
- CHROMIUM
- CO2 AS CARBON
- COPPER
- HYDROGEN CHLORIDE
- LEAD
- MERCURY
- NICKEL
- PARTICULATE MATTER 10 AND 2.5
- VANADIUM AND ZINC.

A NUMBER OF THESE AIR POLLUTANTS CAUSE RESPIRATORY DAMAGE, KIDNEY AND BONE DAMAGE WITH HIGH LEAD LEVELS KNOWN TO CAUSE LEARNING DIFFICULTIES.

NAEI, UK National Atmospheric Emissions Inventory  
<https://naei.beis.gov.uk>

#### ● Designated Amenity Space

Dancing Hill and part of Langley Close are both Designated Amenity Space (DES2). We have already lost sections of designated amenity space due to the Rockfield Farm development. As above Magor with Undy is underprovided with open space. Planning Policy mitigates against the loss of DES2 land. I note that the RAG Assessment proposes to remove DES2 Area of Amenity Importance status from the Langley Close and Dancing Hill sites. From the community's perspective it is not clear how or why the existing designated area of amenity importance can be considered to be less important than it was previously, to a degree which would remove these policy protections and actively promote development within the area. Indeed, the area of DES 2 has been curtailed to



allow for the M4 safeguarded route. Now this designation has been removed, the whole area should return to DES2 status.

- **Flood Risk**

The Langley close site as a green field provides a natural soakaway for surface water. The Mill Reen is a main river and St. Brides Road is subject to both surface water and run off from the Mill. Any development could reduce the natural soakaway resulting in more surface water run off onto St Brides Road.

- **Green Infrastructure and Ecology**

Very little has been made of the Green Infrastructure at Langley close and Dancing Hill, but it forms part of an important green corridor with mature native species. Removal of hedgerow to create a visibility splay would damage the landscape and character. Despite recognising (in the rag rating) the potential for protected species, the proximity from the SINC, the SSSI and the adjacent site DES 2 as recognised as priority grassland, the ecological features of the sites do not seem adequately described in the assessment. There are active badger setts at Langley Close.

- **Highway Access**

Neither Langley close of Dancing Hill have suitable access or safe highway arrangements for active travel. St. Brides Road is a national speed limit road which is single track and now much more heavily trafficked due to the 20 MPH. It is also unsuitable for HGV's. St. Brides Road is less than 3.2 metres wide and has a series of blind bends.

The Highway assessment advises that the current access is unsuitable, and the size and scale of development will have a significant impact on the safety and capacity of the immediate local network and that the existing access is unsuitable. A new access would result in significant loss of the boundary hedge.

Visibility from any new site entrance / exit will be restricted and non-compliant with highway safety regulations.

Welsh Government Document, 'Designing Gypsy and Traveller Sites May 2015', para 3.24' states:

'Good quality roads which are capable of withstanding heavy vehicles should be constructed. Normally concrete or tar macadam on a suitable sub-base appropriate to soil conditions is preferable. Roads should be wide enough to allow mobile homes access on low loader vehicles and yet not encourage on road parking. Roads

	<p>should be a minimum of 5.5 metres wide and accommodate vehicles towing caravans up to 10 metres long.'</p> <p>One of the Dancing Hill sites has been filtered out due to access, yet the remaining site (which is opposite) has been assessed as having potential for a further improved access at the widest point of Grange Road, which is also a dangerous bend and would be in close proximity to the Vinegar Hill development access.</p> <p><b>Other factors</b></p> <p><b>Economic factors</b></p> <ul style="list-style-type: none"> <li>• It appears that some other sites have been ruled out on economic grounds. The Welsh Government capital grant would fund the capital cost of constructing a site. However, it will the feasibility studies such required ecology, contamination studies, noise studies, traffic assessments. It should be noted that the contamination study proposed are only desktop based and further work could be required.</li> </ul>
<p><b>Cllr John Crook</b></p> <p>Councillor for Magor East and Undy</p> <p><b>Email</b></p>	<p><b>It's the last day for the Consultation with regards to the Langley Close site in Magor.</b></p> <p>As you both are aware I have made several objections to this proposed site and have asked for it to be withdrawn from the process.</p> <p><b>However I am asking again for this site to be removed from the process in question, as it's a very poor third choice when you look at the other Two sites in the mix.</b></p> <ol style="list-style-type: none"> <li>1. As I understand the Gypsy Travellers do not want to occupy this site, if this is so maybe you can confirm that this is the case?</li> <li>2. If this is the case as per the above, then why are we pursuing the site (Langley Close) as an option!</li> <li>3. The Weaknesses outweigh the Strengths by far which sorely must be taken into consideration!</li> <li>4. Threats / Risks are a problem going forward!</li> <li>5. The Key Internal Feedback Comments – Highways are not good reading!</li> </ol>

	<p>Therefore, with all this in mind I am asking you to remove this proposed site from the mix as it really is a Very Poor Third option.</p>
<p>Magor with Undy Town Council</p> <p><b>Email</b></p>	<p>Magor with Undy Town Council Understands the Monmouthshire Council's duty to address the identified needs for Roma, Gypsy and Traveller Pitch Provision.</p> <p>The Town Council notes that Dancing Hill has been removed from the process by the Cabinet Member for Sustainable Economy and then formally at the Cabinet meeting of 4th October 2023. However, the Council has commented on the suitability of Dancing Hill as the reasons provided in the Cabinet report are almost identical to the issues at Langley Close and furthermore the report states one of the reasons for removal is that other sites are available. To this end, should any of the other sites be ruled out, the Town Council would not wish to see Dancing Hill ruled in. The Town Council believes that both sites are wholly unsuitable for Gypsy and Traveller accommodation. The Cabinet report of 4th October contains the following paragraph.</p> <p>3.9 Given a combination of the known historic land contamination, possible noise issues, access issues and location immediately adjacent to a Site of Importance for Nature Conservation (SINC), officers recommend that Dancing Hill West is removed from the process as alternatives are available.</p> <p>Furthermore, the Town Council wishes to draw attention to the process, which it has found wholly unsatisfactory. The identification process appears extremely subjective, and the level of inconsistency and error suggests that those involved were not familiar with either Langley Close or Dancing Hill during the selection process. The Town Council noted with interest that the cross-group Pre-decision scrutiny meeting concluded that all the sites were unsuitable for Gypsy and Traveller accommodation. The People Scrutiny committee of 19th July, chaired by Cllr Crook resolved to support Option 3, not to recommend any of the sites to Cabinet to be formally consulted upon but instead to recommend that Cabinet returns to the drawing board.</p> <p>The Town Council has sought to inform and engage residents in the land identification process. The Council has also engaged with Travelling Ahead.</p>

### **Submission to object to potential candidate allocation sites for Gypsy and Traveller pitches, at Langley Close, Magor**

1. Magor with Undy Town Council has approved this submission which seeks the removal of the following sites from consideration for allocation for development of gypsy and traveller pitches in the review of the Monmouthshire Replacement Local Development Plan (MRLDP). The sites in question are as follows:  
Land off Langley Close, Magor  
Land off Dancing Hill, Magor
2. In support of this submission, a number of separate points are made under headings in the sections which follow.

#### **Site identification and Assessment Process**

3. It is understood that no Candidate Sites for Gypsy and Traveller Accommodation were put forward in the Monmouthshire Council's initial or second call for sites exercise. In accordance with Welsh Government Guidance, the council is investigating the potential of providing the accommodation identified as required through the Gypsy and Traveller Accommodation Assessment, on land it owns.
4. An initial assessment of 1500 sites filtered out sites which could not meet a minimum area requirement of 500 square metres, were located in areas of flood risk and which were County Farm holdings, and other criteria. This led to the retention of 70 sites. A second assessment updated the consideration of flood risk in accordance with updated TAN15, with 50 sites remaining.
5. Throughout, sites with uncertain inputs were carried forward to the next stage. 17 sites were subject to a RAG assessment and five have been put forward to members of Monmouthshire County Council for consideration and a decision on whether to proceed to consultation on potential allocation for the development of Gypsy and Traveller accommodation.
6. Within Magor with Undy, two sites have been included in the final five. The first site is land off Dancing Hill and the second site is Land off Langley Close. On the traffic light (RAG)

assessment of 35 (assessed) criteria, more than one third are yellow or red for each site.

### **Consideration of farming activity and agricultural land quality**

7. It is suggested that, if following the assessment methodology used in earlier stages of the MCC land evaluation, the presence of land in active farming use should have led to the land at Dancing Hill and at Langley Close to be removed from the assessment at Stage 2 or earlier.
8. Having reviewed the RAG assessment for both sites they currently have tenants who use the land for agricultural process and that re-development of the land will require serving of eviction notices. This will result in not only loss of agricultural land contrary to both the Planning Policy Wales and the adopted Local Plan but also loss of livelihood to the tenants.
9. Separately, the Planning Policy Wales identifies that agricultural land of Class 1, 2 and 3a should be protected and this should be considered within the local development plan. Presumably, this should also apply to the allocation of Gypsy and Traveller Sites with the local development plan.
10. A consideration of the potential loss of Best and Most Versatile Agricultural Land is a key criterion in Stage 3A of the Candidate Sites Assessment but is absent from the MCC Land Evaluation for Gypsy and Traveller Sites. It would be appropriate to consider the loss of this resource in the land evaluation alongside the presence of active farming activities on land under consideration.
11. Land at Langley Close is considered to contain best and most versatile agricultural land, designated as Class 3A (Good Value). There is a presumption within the Planning Policy Wales against loss of agricultural land, which is also reiterated in paragraph 6.2.25 of the Adopted Local Plan. Specifically, the ALP requires that agricultural land is protected from inappropriate development. Clearly non-agricultural built development fails the obligations of both the PPW and ALP.

### **Reported feedback from RAG assessment of shortlisted sites**

12. The 19 July 2023 MCC Scrutiny Committee Report on 'Meeting Gypsy and Traveller pitch needs – land identification' includes a table of sites after paragraph 3.3. The summary/main conclusion for the Langley Close site in this table indicates 'no significant feedback received to suggest the site's suitability shouldn't be considered further'.
13. In fact, clear concerns are raised in the RAG over the placement of Gypsy and Traveller pitches in proximity to the M4 motorway on both the Langley Close and Dancing Hill Sites (on noise and air quality grounds). Additional objections to Dancing Hill are raised by the EHO in relation to introducing human receptors onto the old landfill site. On Ecology, there are clear recommendations within the RAG Assessment to not proceed further with this site. At Langley Close, there are also concerns about ecological impacts.
14. In short, the summary of RAG assessment significantly underplays the constraints on Langley Close and on Dancing Hill. At Dancing Hill, to address some constraints would appear mutually exclusive, for example addressing concerns about amenity (leading to considering of a buffer between new development and existing residents to the south, and health (leading to not developing gypsy and traveller pitches right next to the motorway to the north). The site is only 90m across from the boundary of adjacent houses to the motorway hard shoulder. This is before ecological corridor and important hedgerow (which bisects the northern part of the site) considerations come into play.
15. At Langley Close, similar conundrums are present. The site is an irregular shape, dissected by 2 ancient hedgerows which split the site into 3 smaller sites. This reduces the useable space in the eastern triangle to 1.72 acres, the western area to 1.9 acres and the northern area to 0.24 acres. Much of the Langley close site is within 50 metres of the M4 motorway. At the narrowest point, the site is 50 metres from neighbouring houses to the tree buffer and the Junction 23 off slip. The creation of any buffer would render much of the site unusable. A new on-site access road will reduce useable space further. There are also setting considerations for the nearby listed buildings, a similar requirement to locate away from existing housing and yet also

away from the M4 motorway adjacent and ecological constraints which are part of the same issues raised at Dancing Hill – these two sites exist within an open nature corridor between the built settlement of Magor and Undy, and the M4. Development within it will compromise its function. Langley Close site is also located around 70m from a local SINC. Proximity to the SINC along with the other constraints ought to have seen the sites removed at an earlier decision point.

16. Whilst marked green in the RAG, the Langley Close site is 1km from shops, schools and community facilities – the bus service is infrequent. Access considerations for the suitability of Candidate Sites in the call for sites exercise revolve around reducing the need to travel to access essential services. 1km is considered too far for regular walking trips to access essential services on a daily basis. Whilst the site at Dancing Hill is closer to town (around 700m, at the more distant end of a walkable neighbourhood) this has a gradient.
17. The RAG shows both sites as designated DES2 amenity land. Development within these locations is not supported. This is a matter of principle and should be sufficient to remove the sites from consideration.
18. Travelling Ahead comments in the RAG rejected the Dancing Hill site on grounds of proximity to the M4 and to existing residents. Comments on Langley Close raised concern over the proximity of the site to the M4.
19. In summary, it should be evident from the RAG alone that significant doubt exists over the viability, deliverability and sustainability of the Langley Close and Dancing Hill sites such that it would seem prudent to exclude them from further consideration. The starting point for any potential application on the sites would be subject to these significant doubts and requiring costly technical assessments for significant matters including land contamination, air quality, noise, ecology, highways, landscape and heritage. Potential mitigations (should these be considered possible are likely to be costly, eg for site remediation, noise impact mitigation, landscaping and access works.

20. Some of the matters raised in the RAG and discussed above are explored in more detail below to illustrate the significant barriers to delivery of a development on the sites at Langley Close and Dancing Hill.

### **Noise Conditions**

21. The noise conditions likely to exist at the Langley Close and Dancing Hill sites can be illustrated through review of technical reports submitted in support of the approved development of 155 dwellings at Vinegar Hill (DM/2019/01937) is located adjacent to the M4 motorway, 150 metres to the east of the site at Dancing Hill. An Environmental Noise Assessment was submitted to discharge conditions 25 and 40 of the planning permission (in relation to parcel B). This indicated that environmental noise conditions arising from M4 motorway traffic (based on a 2018 noise survey undertaken for the original application) were between 60.2 and 61.1 dB during daytime hours (07:00-23:00 hours) and between 56.9 and 58dB during night-time hours (23:00-07:00 hours) at a survey position approximately 90 metres from the motorway – a 3db difference between daytime and night-time. (The 90m distance approximates to the distance between the southern boundary of the Dancing Hill Site, to the hard shoulder of the M4 Motorway to the north).

22. According to British Standard 8233:2014, noise levels inside living rooms should aim (there is a 5dB leeway) to be no higher than 35dB during the daytime period and no higher than 30dB in bedrooms during the night-time period, so surveyed noise levels were well above acceptable levels. However, through modelling of noise levels, the noise attenuation effects of three-dimensional buildings and structures were considered, as were the noise attenuation properties of building facades. For the nighttime, if an open-window would produce higher noise levels inside bedrooms, then acoustic glazing and trickle vents to provide air-flow could be incorporated into building design and this was considered to be acceptable.

23. Noise levels in outside garden spaces should not exceed 50dB – the effect of noise attenuation through the development orientation and layout ensures can be achieved (though some leeway is allowed in guidance for the 'convenience and



benefit' of living next to a motorway, the implication being that there are all sorts of services and facilities which go along with strategic transport infrastructure that make this a consideration worthy of living with more traffic noise).

24. The above process through which a seemingly difficult noise environment can be made to work for a development would be much harder to address for a gypsy and traveller accommodation site next to the M4 motorway. This is simply due to many of the development characteristics of a housing site being absent – there is not an extensive fixed layout of substantial 3D Structures to dampen and absorb noise – caravans are not fixed but come and go. The noise attenuation abilities of caravan facades are significantly lower than traditional houses. The design mitigations required to make internal noise levels in bedrooms during the night-time cannot be controlled through a planning permission as the caravans are likely to already exist and may not possess the required features – the noise environment has to be suitable without caravan design mitigation. Finally, people living in caravans (which is small accommodation in terms of available internal floorspace) tend to live life outdoors to a greater extent and so the treatment of noise in outdoor spaces becomes more important.
25. In order to achieve a suitable separation from adjacent housing on both Dancing Hill and at Langley Close, it is highly likely that development would need to occur closer to the motorway.
26. In summary, sites adjacent to the M4 motorway should not be considered suitable for Gypsy and Traveller Accommodation owing to a negative noise environment which cannot be mitigated through building design and owing to the operational aspects of such sites which create more exposure of site users to high levels of noise.
27. Noise impacts should be indicated as a 'red' in the RAG assessments of the Langley Close and Dancing Hill site. It is contended that further survey work would only confirm this position or at best indicate an extremely marginal noise environment position which, in the forward planning of gypsy and travellers sites, should not be considered further. There is

significant noise pollution risk and both sites are highly likely to fall into Noise Exposure Category C or D (TAN 11). This means that planning permission for residential dwellings should not normally be granted (C) or should be refused (D).

### **Air Quality**

28. Previous modelling to assess the impacts of the consented development at Vinegar Hill assessed the impact from existing traffic and from proposed development in relation to emissions for NO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. One property on Grange Road (Receptor 2) was located approximate to the northernmost part of the Dancing Hill site, across the road to the east. With development and sensitivity variables factored in, this location was shown in the range 36.5µg/m<sup>3</sup> to 39.2µg/m<sup>3</sup> in relation to the annual mean objective of 40µg/m<sup>3</sup> for Nitrogen Dioxide. A further receptor (receptor 3) located to the south along Grange Road approximated to the southern extent of the Dancing Hill sites and emissions levels projected here were lower.
29. The Welsh Government has set objectives to lower air pollution and this means reducing impacts from development to levels well below Air Quality Objective levels, given the potential for negative health effects to occur even with lower emissions. Active forward planning of allocation of sites should ensure that sites that would introduce sensitive human receptors in locations with air quality conditions close to the Objective Levels are not considered further.
30. The assessment at the above site was based on predicted traffic for 2018 projected to 2021 and through the decade. Air Quality Assessment outcomes in relation to existing receptors (such as the Dancing Hill site) in this location are highly sensitive to traffic levels on the M4. Since 2018, significant events have occurred with relevance to traffic flows on the M4, including the COVID-19 Pandemic (which might reduce or alter flows as more people now work from home) and the removal of tolls on the Severn Bridge (which it is predicted have boosted traffic flows going over the bridge).
31. At this stage of consideration, further work to assess air quality would be required to determine whether any development

can take place at Dancing Hill and Langley Close given the potential for impacts on health to arise from traffic on the M4. Air Quality impacts should be indicated as red in a RAG Assessment of this site.

### **Site Access, access routes and proximity of services**

32. The Dancing Hill Site would be accessed from Grange Road. At present there is a gate providing access off Grange Road into a northern field separated from the southern field in the land parcel by a hedge. There is no formal access from Grange Road through the gate and this location would be unlikely to be considered acceptable given its position to the north of the site close to the bend.
33. The road leading up to the site at Dancing Hill has priority given to northbound traffic – the road is narrow between existing housing. Access to the site would be from a southerly direction through the narrow section of road. Other routes via Grange Road require the use of narrow country lanes for onward travel to the wider main road network. Going south, Grange Road turns into Dancing Hill which connects with the B4245, providing a route into Magor and out to the wider road network east and west.
34. The suitability of the route to the site, and the potential for the creation of a workable access into it, will depend on the scale of proposed development and traffic generated from this. There is a question mark over suitability of the upper part of the route approaching the site, for regular use by vehicles towing caravans.
35. The same roads south provide a pedestrian route across the B4245 to the village centre and local schools, around 600m to the shops and pubs and 700m to the schools. The route runs downhill to town centre and uphill to the Dancing Hill Site. The gradient might discourage cycling to and from the site. The site is toward the limits of what would be considered walkable on a daily basis.
36. The site is located outside the settlement edge of the village, close to the motorway. There are immediate neighbouring houses, but the overall position is that the site is relatively

distant from local services when the gradient of the hill is considered as a potential barrier to movement on foot or by bicycle.

37. In vehicle access terms, with regard to road routes to and from the site to the wider road network, these exist in one direction and are technically constrained for caravans near to the site. The access route should be regarded as Red in a RAG assessment.

38. Access to services is at the limit of acceptability for walking given the topography and should be regarded as Yellow also in a RAG assessment.

39. Access to the Langley Close Site would require a new access from St. Bride's Road, necessitating the removal of ancient hedgerow. St. Brides Road is narrow and a single-track road adjacent to the proposed site for allocation. In relation to the possible allocation for a Travellers site, guidance prepared by the Welsh Government titled "Designing Gypsy and Traveler Sites" states that access road to the site should be at least 5.5m and be able to accommodate vehicles of up-to 10m length. St Brides Road does not meet these requirements. Welsh Government guidance also states that a footpath of at least 0.9m wide is required. This is absent from the Langley Close site. Therefore, the Langley site fails to achieve minimum access requirement provided by Welsh Government and should be screened out. It is understood that this is consistent with the consultation response given by the Traveller Community via the People Scrutiny Committee. The Council's Highways Engineer has stated in the RAG Document that the development at Langley Close will have a significant impact on the safety and capacity of the immediate local network, the existing access is unsuitable and a new access to the site will need to be created. Access limitations for both sites fail the obligations under Policy H8 of the ALP.

40. Whilst there is an existing stub off St Brides Road this appears to connect to residential gardens and a new access will be required. St Brides Road is on a bend at this point with no real opportunity for creation of a suitable visibility splay to allow safe access and egress from vehicles entering Magor from the North.

## **Leisure Corridor**

41. The Dancing Hill and Langley Close sites are located within a buffer of undeveloped land running between the northern edge of Magor and Undy and the M4 motorway. The Dancing Hill site is located at a point where the buffer connects to woodland running south through Magor. Land further to the east was also buffer, but is now under construction for housing.
42. The designated public footpath network in the area has a missing link across the Dancing Hill site, needed to make a connection from footpaths to the west with those to the east, across the northern edge of Magor and Undy. The Dancing Hill site crossed by walkers to continue a west-east, using paths which are not formally designated public rights of way.
43. Development of any kind at this location has the potential to disrupt the site's function in facilitating a leisure corridor and connection.
44. The Monmouthshire Green Infrastructure Strategy (2019) recognises the range of scales and connectivity through which green infrastructure functions and is provided. At neighbourhood scale, important green infrastructure resources include amenity greenspaces (such as land designated under policy DES2) and urban woodlands (such as that extending into the heart of the settlement from the Dancing Hill site and wider buffer gap to the north of the settlement. Important connections include pedestrian paths and rights of ways, green links and corridors, such as those provided at and through the sites at Langley Close and Dancing Hill. The development of these sites would impact on functioning, designated green infrastructure resources important to the local community.
45. The function and value of land south of the M4, sitting between it and the edge of Magor, is already recognised in the adopted local plan. Policy DES2 designates areas of amenity importance. These are designated in recognition of the value of land in providing amenity space where it might otherwise be lacking.

46. DES2 sets criteria for development to be considered acceptable within Areas of Amenity Importance. The policy states that there should be no unacceptable adverse effect on any of the following:

47. ***Visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces.***

The Monmouthshire Landscape Sensitivity and Capacity Study (Oct 2009) identifies both the Dancing Hill site and the Langley Close Site within Site MA05. The candidate sites are part of an important buffer (gap) between the settlement and the M4 motorway. Dancing Hill site is in a narrow gap between the settlement and the motorway and is elevated providing a vista from the west to the east and from the settlement edge. Development of the site would intrude into this vista. The Langley Close site is considered to be high to medium sensitivity owing to its more positive relationship between the settlement and the countryside, afforded by public rights of way links. This would be highly sensitive to development. Landscape sensitivity might be considered medium directly adjacent to the motorway, but then this would be unacceptable from an amenity and health impacts perspective. An update to the above assessment was carried out in 2020 and this confirmed the sensitivity of the areas discussed to new development. It said that should development be considered, the mitigation discussed would involve significant and heavy screens of tree planting. It is contended that this would remove one of the essential features of this area which is the vistas it affords. This would be a significant disbenefit to users of this important amenity area.

48. ***The relationship of the area of amenity importance to adjacent or linked areas of green infrastructure in terms of its contribution to the character of the locality and/or its ability to relieve the monotony of the built form.***

If development intrudes into the gap between the settlement edge and the M4 motorway to the north of Magor and Undy then an essential rural village characteristic of the settlement will be eroded and lost. Without the gap, development will spread to the M4 motorway, providing a hard unpleasant edge to the settlement which currently is buffered by agricultural land for the most part. Access to countryside to the north will only be possible by travelling under or over the M4 in a few places.

Bearing in mind that the railway to the south of the settlement severs Magor and Undy from the levels to the south, access for local people to amenity areas and countryside is already constrained. For this reason, development in the countryside to the north of the settlement should be avoided.

49. ***The role of the area as a venue for formal and informal sport, general recreation and as community space, expressed in terms of actual usage and facilities available as well as its relationship to general open space requirements as set out in policy CRF2.*** The sites at Dancing Hill and Langley Close are within an area which is extensively used for walking via formal public rights of way and informal pathways. These link the settlement to the countryside and provide opportunities for users to experience views and vistas and escape the urban settlement without crossing the motorway. The dancing hill site sits at an important fulcrum of paths extending west and south. The site affords east west informal walking paths. Development of the site would adversely impact this important resource. The Langley Close site is more sensitive to development for the same reason in that the site provides a positive link between settlement and countryside as identified by the landscape sensitivity and capacity study.
50. ***The cultural amenity of the area, including places and features of archaeological, historic, geological and landscape importance.*** The Langley Close site lies within the setting of a listed building and both this and the Dancing Hill site are identified as have high to medium sensitivity to new development in landscape assessment terms, as discussed above.
51. ***The nature conservation interest of the area, through damage to, or the loss of, important habitats of natural features (policy NR1 applies).*** In response to the RAG assessment, the ecology officer from Monmouthshire County Council has raised concerns over both Langley Close and Dancing Hill in terms of the impacts of development of these sites on wildlife and habitats. This is discussed further below.
52. It is noted that the RAG Assessment proposes to remove DES2 Area of Amenity Importance status from the Langley Close and Dancing Hill sites. From a local community perspective it is

not clear how or why the existing designated area of amenity importance can be considered to be less important than it was previously, to a degree which would remove these policy protections and actively promote development within the area.

### **Ecology and Wildlife**

53. Should the sites be developed, the new access will be required with loss of existing trees and hedgerows. The removal of the ancient and ecologically rich hedge will cause environmental damage and fails the obligations under Policy S13 of the Adopted Local Plan.
54. Both sites contain areas of trees and woodland which can support wild life. In addition, their greenfield nature and location creates a green corridor which supports and allows movement of wildlife so creating a green corridor between the M4 Motorway and the urban development of Magor and Undy.
55. Ecological Connectivity Assessment of Settlements in Monmouthshire Report produced by Gwent Ecology looked at opportunities to strengthen existing habitat connectivity. Including Pg 42 paragraph 2) "Strengthen the St Brides Brook Mill Reed Corridor, the main semi natural corridor through the urban zone of Magor and Undy". This will be further eroded by the proposed development not improved.
56. Monmouthshire County Council declared a Climate Emergency one of the key actions is to embed biodiversity throughout decision-making; reduce key pressures on species and habitats; supporting landscape scale nature recovery projects and partnerships to enhance ecosystem resilience. Construction of built development on either site contravenes these obligations and commitments.
57. Policy GI 1 of the Adopted Local Plan requires planning to maintain, protect and enhance green infrastructure networks. There are also requirements within Planning Policy Wales to providing resilience in the eco system, halting and reversing loss of biodiversity, management and enhancement of green



infrastructure. Construction of built development on either site contravenes these obligations.

58. The proposed allocation of the site for built development risks damage to nature conservation interest of the area, through damage to, or the loss of, important habitats or natural features and is therefore contrary to policy NE1 of the Adopted Local Plan.

### **Neighbours and Amenity**

59. The Dancing Hill Site has neighbouring residential properties along the southern boundary, and across Grange Road to the east in the northeast part of the site. The Langley Close Site is an irregular shape and is bounded on four sides by residential properties on St. Brides Road, Langley Close, Newport Road and by Grade 2 listed Woodland House. Given the matters raised about the strong potential for noise impacts and air quality impacts on the occupants of both sites, it is highly likely that, should either site be developed for Gypsy and Traveller accommodation, the need for a buffer between the development and the M4 might compromise land use and a suitable landscaped buffer from existing residential development.

60. We understand that the identification of sites and progression of proposal to potential site allocations for Gypsy and Traveller Sites should be undertaken in consultation with the Gypsy and Traveller community. In this instance, we understand that consultation has taken place and that the response from the Gypsy and Traveller community was that neither the Langley Close site were considered suitable owing to the poor noise and air quality environment and because of proximity to neighbouring development. Whilst the issue of proximity is difficult, because a clear aim in policy is to improve integration and reduce isolation in these communities, the response from the Gypsy and Traveller community in these cases indicates significant environmental constraints with the sites, potentially perceived to affect health. The response also indicates a concern about exposure of the sites to potential conflict in land uses (referring to the role of this land in providing a buffer and leisure walking routes).

61. The noise and environmental conditions are likely to result in a need to place the development in the areas furthest from the motorway, close to existing homes. A significant buffer may not be possible.

### **Conclusion**

62. Whilst the need to identify sites for gypsy and traveller accommodation is recognised, the identification of sites at Dancing Hill and Langley Close are considered to be ill-suited for the purpose, because they are too close to the motorway, giving rise to significant potential amenity and health concerns. Any mitigation of such impact (considered that these would be unsuccessful would in any case rely on moving the development closer to existing residential development and to other receptors (listed building). Development in these spaces would intrude into sites which are used for leisure and recreation purposes and cause landscape sensitivity impacts. Development in an important buffer to the north of the settlement will erode it and lead, eventually, to the settlement extending to the edge of the motorway. Site accessibility by vehicles is constrained by the local road networks. One site is a former landfill with potentially significant remediation requirements. From a constraints perspective, these sites are significantly constrained and there is a low level of likelihood that these can be overcome through technical assessments and mitigation measures.

63. Apart from this, both sites are considered isolated from local community surveys through a combination of distance (1km from Langley Close site to local schools) and topography (Dancing Hill is elevated and 700m distant from the school). Public transport is limited to an infrequent local bus service.

64. Magor with Undy Town Council strongly recommend the removal of sites at Langley Close and Dancing Hill from further assessment and consideration, so that they remain free from development and retain their important functions.

<p>Portskewett Community Council</p> <p><b>Feedback form</b></p>	<p><b>On Bradbury Farm and Oak Grove Farm's disadvantages:</b> The site would be adjacent to a busy road and there are no footpaths or cycle paths near the site. There is no public bus service which could service the site. Current infrastructure i.e. school, doctors, dentist, in the area are already oversubscribed. There are no shops near the site, Caldicot town being the nearest, to which access would be difficult given the lack of bus service and safe walking/cycling routes. A large housing development is planned near the site which wouldn't be akin to the rural environment normally preferred by gypsies/travellers.</p> <p><b>Further comments:</b> "The current provision of gypsy/traveller sites in Monmouthshire are in Portskewett, other areas of Monmouthshire are lacking provision. By locating all sites in the south of the county no choice is being offered to gypsies/travellers who may prefer to be located in other areas within Monmouthshire."</p>
<p>Caerwent Community Council</p> <p><b>Email</b></p>	<p>Crick is a small hamlet with just over 60 houses. Crick falls within the Ward of Caerwent Community Council (CCC) but the Bradbury Farm site which is within a few hundred yards of Crick falls under Portskewett Community Council due to the electoral boundaries. In view of this we feel it is appropriate to comment on the two proposed traveller sites at Bradbury Farm Crick and Oakgrove Farm at Leechpool which would directly affect the residents we represent.</p> <p>Please see our concerns below:-</p> <p><b>1. Clustering of Traveller Sites</b></p> <p>The hamlet of Crick currently has one private traveller needs site with a park home and multiple static and touring caravans with associated vehicles. This is on the boundary of the hamlet of Crick, is less than 100 yards from a Grade 2 listed building and lies within the village boundary as defined by the 'Crick' road sign on the A48. The proposed Bradbury Farm site would lie within a few hundred yards of the hamlet on Crick Road. There is no mention of this pre-existing traveller site in any of MCCs documentation, (RAG) Report etc. It seems unusual that the small settlement of Crick should be put into the position of having two traveller's sites 0.3 miles apart, both immediately adjacent to it and lying on two of the three roads entering the hamlet. One Crick property will look from their front garden, across the A48 into the existing traveller site and, if it</p>

proceeds, from their back garden across a single field to the proposed Bradbury Farm site.

In addition, there is a second pre-existing site for travellers needs already further up Crick Road 0.3 miles from the proposed Bradbury Farm site (and 0.8 miles from the proposed Oak Grove site).

It is unclear why MCC are proposing to cluster traveller sites in this way. Welsh Government guidance that clustering such as this can lead to problems.

## **2. Road and Pedestrian Access**

The Bradbury Farm site lies on an S bend of Crick Road, and it is difficult to see how this is considered a safe access point for a multi occupancy site given the limited visibility, even with a reduction from the current unrestricted speed limit. A local resident in a nearby house was told by MCC it would not be safe to have a driveway opening on to Crick Road near this point.

The Oak Grove site would open onto the B4245 another busy road.

Neither site has suitable pedestrian access. It is suggested that this will follow future development as planned with the RLDP, but this may take some considerable time for this to be taken forward, yet we are told these traveller sites are needed as a priority. So, the sites either must be delayed or will not have safe pedestrian access, street lighting, etc and residents from the 2 sites will be reliant on their vehicles for travel. Active Travel would be dangerous, especially for children.

## **3. Amenities**

Crick has no shop or other public amenities for residents of the Bradbury Farm site to use or to act as a means to integrate into the settled community. The bus service is very limited, and the development of a site is not likely to lead to any change. Crick does not have any mains drainage.

Oak Grove Farm is also a long way from any local amenity.

## **4. Health and Wellbeing of Travellers**

The Bradbury Farm site is adjacent to the M48 with resulting noise and air pollution.

## **5. Impact on Character and Appearance**

	<p>The proposed site at Bradbury Farm along with plans in the RLDP will significantly change the nature and character of the hamlet of Crick.</p>
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	<p>The Oak Grove site will have a negative visual impact, including at night, with the area being highly visible including from the A48.</p>
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## Other stakeholders

7.2 Responses were provided from relevant persons relating to external organisations.

- A local sports club.
- Road Chef, Magor.

## 8. Feedback from the Gypsy & Traveller community

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8.1 According to the data, **two feedback form submissions** were provided by those who identified as Gypsy & Traveller.

8.2 Key feedback raised:

- Both agreed to the Council's vision, acknowledge that safe sites were needed and were supportive of the process.
- Both raised concerns that Langley Close site was too close to other homes and the motorway.
- Both agreed that Bradbury Farm and Oak Grove Farm were 'nice' site locations as they offered lots of space.

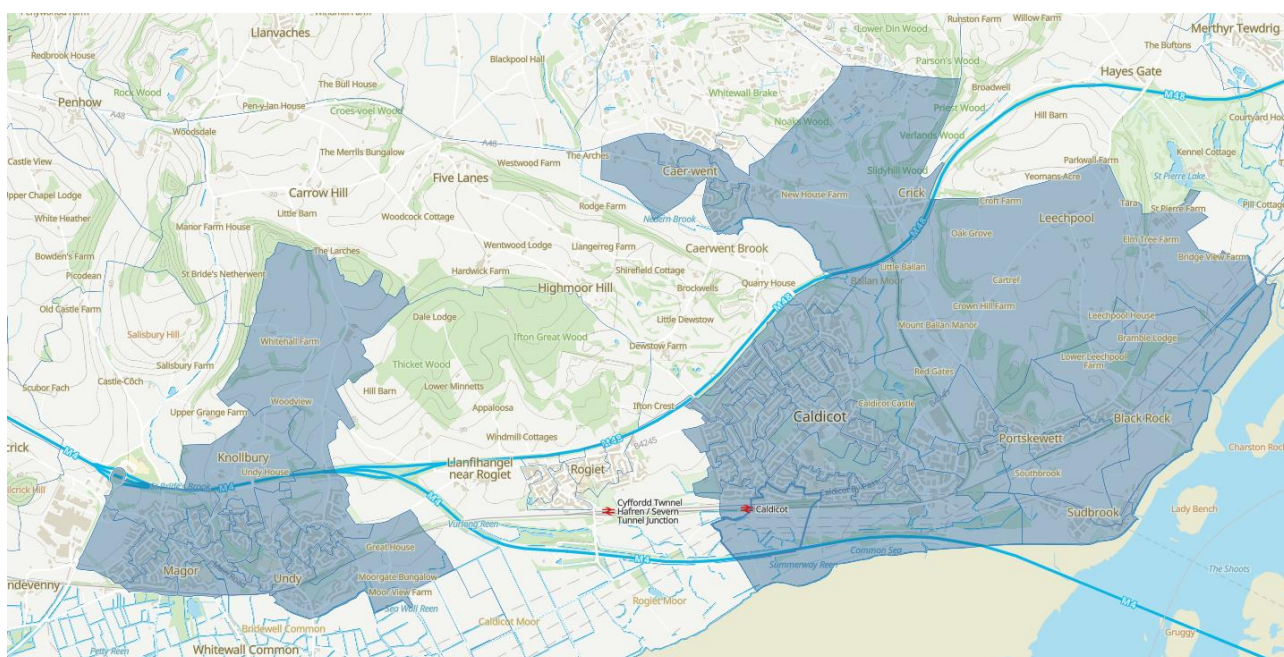
8.3 It is possible further responses may have been received from the Gypsy & Traveller community, but their identify was not disclosed on their feedback forms.

8.4 **Two additional verbal responses were received.** One Gypsy and Traveller provided feedback by phone, pledging support to the proposals and all three sites and one welcomed the Council's proposal to identify potential sites.

# 9. Feedback from survey responses

## Who responded to survey?

9.1 This section of the report gives an overview of the demographic of respondents in comparison with the local and national statistics from the census data. The feedback form is to help determine whether the engagement is in line with the local community. See below map of the locations considered for this:



## Age

9.2 A total of 381 of 389 respondents provided an answer to what age group they belonged with, 23 of whom chose 'prefer not to say'. Those who were above the age of 55 were the most active in terms of feeding back (192) compared to those who were younger (166). A significantly higher percentage of people in the 55-64 age group contributed to the consultation compared to the local community average.

Option	Total	Total %*	Local community average %
0-15	0	0.0%	16.3%
16-24	6	1.7%	9.6%
25-34	46	12.9%	11.7%
35-44	64	17.9%	11.1%
45-54	50	14.0%	13.9%
55-64	97	27.1%	14.7%
65+	95	26.5%	22.6%
Prefer not to say	23	-	-
<b>Total</b>	<b>381</b>		

\*=Percentages exclude 'Prefer not to say' figure.

## Gender

9.3 A total of 379 of 389 respondents provided an answer to what age group they belonged with, 18 of whom chose 'prefer not to say'.



Option	Total	Total %*	Local community average %
Female	179	49.6%	51.3%
Male	182	50.4%	48.7%
Other gender identity	0	0%	0%
Prefer not to say	18	-	-
<b>Total</b>	<b>379</b>		

\*=Percentages exclude 'Prefer not to say' figure.

## Ethnicity

9.4 A total of 380 of 389 respondents provided an answer to what ethnic group they belonged to, 19 of whom chose 'prefer not to say'. 97.2% of respondents reported themselves as White: Welsh, English, Scottish, Northern Irish, British or Other, which is nearly in line with the local community average.

9.5 Please note: Table below shows the ethnic identities of those who contributed to consultation.

Option	Total	Total %*	Local community average %
<b>White: Welsh, English, Scottish, Northern Irish, British and Other</b>	351	97.2%	97.3%
<b>White: Gypsy, Roma or Irish Traveller</b>	2	0.6%	-
<b>Asian, Asian Welsh or Asian British</b>	2	0.6%	1.0%
<b>Black, Black British, Black Welsh, Caribbean or African</b>	0	0.0%	0.1%
<b>Mixed or multiple ethnic groups</b>	2	0.6%	1.3%
<b>Other</b>	4	1.1%	0.2%
<b>Prefer not to say</b>	19	-	-
<b>Total</b>	380		

\*=Percentages exclude 'Prefer not to say' option.

9.6 Statistics above do not include Black, Black Welsh, Black British, Caribbean, or African (0.9% of the Welsh population) as they did not submit feedback to this consultation.

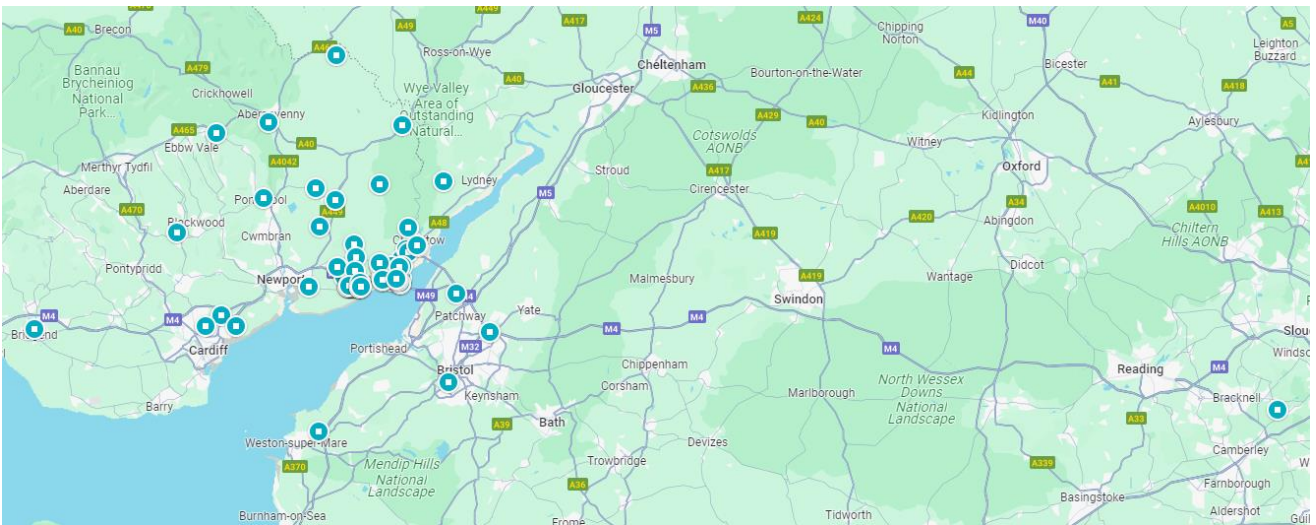
## Disability

9.7 A total of 379 of 389 respondents provided an answer to what age group they belonged with, 24 of whom chose 'prefer not to say'. A higher percentage of those without a disability contributed to the consultation compared to the local community average.

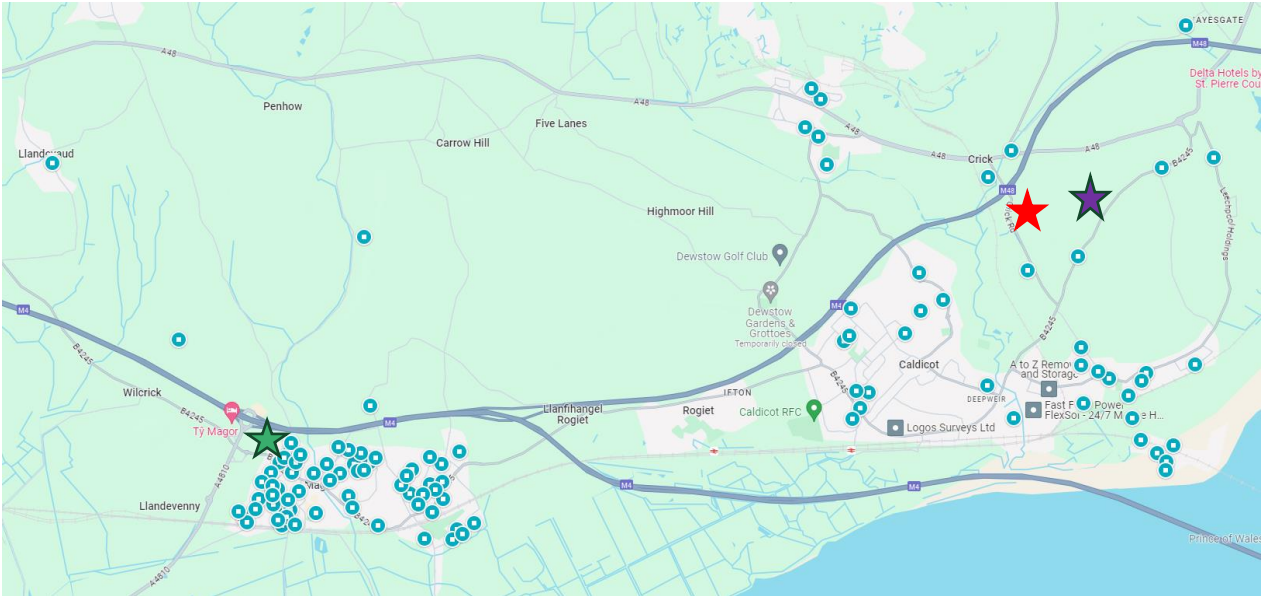
Option	Total	Total %*	Local community average %
Yes	25	7.0%	18.3%
No	330	93.0%	81.7%
Prefer not to say	24	-	-
Total	379		

## Location

9.8 Of the 389 survey respondents, 367 provided their postcode in full, 307 (84%) of whom were from the postcode areas of NP26 3 (local to Langley Close) or the postcode areas of NP26 5 (local to Bradbury Farm and Oak Grove Farm). Feedback was also provided from a number of people residing away from Monmouthshire, notably in Cardiff, Bridgend, Ebbw Vale, Bristol, and Ascot in Berkshire.



**Figure 1: Pinpointed postcodes of all survey respondents who shared this information.**



★ **Langley Close**

★ **Bradbury Farm**

★ **Oak Grove Farm**

**Figure 2: Pinpointed postcodes local to proposed site locations**

9.9 **Please note:** These pinpoints do not point to specific properties, but the centre of a given postcode.

## Feedback on the Gypsy and Traveller sites

9.10 This section of the report sets out a summary of the responses from the feedback form and emails in relation to the three proposed sites.

9.11 We have discounted any individual feedback which contains discriminatory language or stereotyping towards the Gypsy and Traveller communities. This was clearly stated at the start of the consultation process on the feedback form.

9.12 It is also worth noting that much of the feedback provided for all the sites are replicated from materials and notes created by campaigners who are against the proposals.

## Langley Close

9.13 **Advantages/strengths – 53 responses, summarised below:**

- It is very close to the community to which could give Gypsies and Travellers the opportunity to integrate more with society.
- Within walking distance of local amenities.
- Active travel and community engagement will be possible.

- Off road isn't as busy as the two locations proposed in Crick, so risk is reduced.
- While also seen as a disadvantage, feedback suggests that its close proximity to the M4 is also an advantage, so that trailers can easily access the motorway.
- Some have expressed preference of sites that aren't in Caldicot, so prefer Langley Close site for that reason.
- It is a council-owned site not being used or occupied.
- Plenty of open land and not too much development expected residentially.
- The site is nearer to mains electricity and mains sewage therefore would require less infrastructure and money to make the area suitable.
- The visual impact of the site is much lower than the other two proposed sites.
- The area is surrounded by a tree belt to give both communities privacy.

#### 9.14 Disadvantages/weaknesses:

##### **Principle of location – 126 responses:**

- Manson Heights and Mitchel Troy sites were removed on grounds of access. There are however significant accessibility challenges for the proposed Langley Close site. The site exits on to St Bride's via a blind bend on to a heavily trafficked, national speed limit narrow country lane that lacks footways.
- This is a greenfield site. It has an important biodiversity which should be respected and cared for.
- The Council's Highways Engineer has stated in the RAG Document that the development will have a significant impact on the safety and capacity of the immediate local network.
- Some respondents mistakenly suggested that the site was used for sustainable farming and food production and is part of the Council's local food initiative.
- ...

##### **Green and open spaces – 111 responses:**

- This is one of the last remaining Magor with Undy green open spaces, forming a buffer between the current residential developments and the M4. Reinstating the Public Right of Way (PROW) from Dancing Hill westwards and across the Langley Close site to join the existing PROW to the west of the site would provide much needed recreation space, including dog walking. The latter point is particularly important if the community field at Sycamore Terrace is taken away by MCC and given to Magor CIW primary school as a school field,

as residents would not be able to let their dogs off the lead or use this space for safe dog-walking (as is currently used).

- There was concern that the current tenant of the land would potentially lose their licence, which may detrimentally impact on the tenant's income and family.
- There is a misunderstanding that the tenant produces sustainably sourced local food for the local community on this land.

#### **Traffic and road safety – 102 responses:**

- There is also only one road in and out of Magor and Undy which comes to a standstill any time something happens on the motorway or when local bridges are closed.
- The site is adjacent to the M4 motorway and raised slip road to Junction 23A.
- There are concerns about lack of footpaths/ narrow footpaths and poor visibility for all residents especially for children walking to/from school buses. This increase traffic will mean even more of a challenge for all pedestrians to navigate the roads safely.
- Visibility from the site is restricted and non-compliant with highway safety regulations.

#### **Noise – 153 responses:**

- Noise pollution levels are extremely high - exceeding 75 decibels on much of the site (any noise exceeding 70 dB is considered harmful and disturbing and could result in hearing loss over time).
- Noise and air pollution from the adjacent motorway would be detrimental to health and well-being and negligence to adhere to such issues would be a breach of the Council's duty. According to the Department for Transport, traffic has reportedly increased by 21% since the tolls were abolished.

#### **Impact on existing neighbourhoods – 146 responses:**

- The site backs onto many longstanding, existing houses and both sites would be overlooked. This would compromise both visual and acoustic privacy for both the current residents and Gypsy development.

#### **Scale of site and pitches – 46 responses:**

- The site is an irregular shape, dissected by two ancient hedgerows which split the site into three smaller sites. This reduces the useable space in the eastern triangle to 1.72 acres, the western area to 1.9 acres and the northern area to 0.24 acres. A new on-site access road will reduce this further. Unless the Council is intending to remove the ancient, protected hedgerows which contain

protected species, the remaining useable space will restrict the layout and density of pitches.

### **Impact on views – 3 responses:**

- The gardens in Langley Close will be overlooked and the views of greenery we have had for years will no longer be there.

### **Habitat loss – 138 responses:**

- The Council's Ecology Officer has stated in the RAG Document that the woodland along the M4 corridor is likely to support dormouse and other species that may be present include bats (including roosts in trees), reptiles and nesting birds. There is also evidence of other protected species, including badgers.
- Removal of tress and hedgerows to facilitate the site would not only jeopardise the Gypsy and Traveller community but also the existing residents.
- The site is dissected by ancient hedgerows protected under the Hedgerows 1997 regulations.
- The site is graded Best and Most Versatile (BMV) land. Only 10-15% of land in Wales is classified as BMV land. Planning Policy Wales states it should be conserved as a finite resource for the future.

### **Pollution – 160 responses:**

- Gypsy families would face respiratory related health issues as the site is closely adjacent to the main M4 Motorway, air pollution levels are known to be excessive in this area.
- Possible landfill site and potential ground contamination.

### **Flooding risk – 85 responses:**

- Uneven topography and concreted areas reducing natural soak-away pose a significant flood risk. The St Bride's Road is renowned for flooding, and this creates issues at every major downfall (See photos received in [Appendix 7](#)).
- The site is not level, particularly to the west. The current green field provides a natural soakaway for surface water, but excess water currently floods St Bride's Road. Concreting over areas will reduce the natural soakaway resulting in more surface water run off onto St Bride's Road and potentially flooding nearby properties.

### **Impact on protected sites – 125 responses:**

- There is a Listed Building, Woodland House, situated only 40m from the proposed site.

- The site is within the Gwent Levels, only 70m from a Site of Importance for Nature Conservation (SINC) and only 700m from the Site of Special Scientific Interest (SSSI).
- The site lies within a Mineral Safeguarding Area.

**Property values – 2 responses:**

- Property prices are already starting to go down, we are worried it will get worse should proposals go ahead.

**Overdevelopment of area – 59 responses:**

- Magor with Undy is already overdeveloped, with a documented deficit of open green space. Part of the site is currently designated as an Area of Amenity Importance, yet the Council intend to remove this to allow development.
- It's difficult enough as is to register for healthcare facilities such as a local GP, not to mention a dentist, which I've still be unable to get locally after living in the area for a few years.
- Lack of Welsh language primary and secondary education. Considering Wales wants to increase the number of Welsh speakers within the country, it would be at a disadvantage to the travelling community to be in an area where there are little to no opportunities for them to attend a school through the medium of Welsh.

**Bradbury Farm and Oak Grove Farm**

9.15 Due to site locations being near to each other, feedback provided for Bradbury Farm and Oak Grove Farm were similar and therefore grouped in this report.

9.16 **Advantages/strengths – 87 responses, summarised below:**

- Further away from the M4 so therefore the area has better noise level and air quality compared to the proposed Langley Close site.
- The site retains good access to public transport and has easy access to Caldicot and a range of local services.
- That stretch of the A48 was a Traveller's route hence Travellers know this area probably better.
- Monmouthshire County Council own the land.
- Remote location on a quiet stretch of road.



- It is far enough away from existing dwellings as the Traveller community prefer not to be adjacent to existing houses.
- It is a flat/level site.
- This site is also surrounded by hedgerow and fencing giving the tenants privacy.
- Crick is a small village with ample green space to share. Giving up part of an existing farm is more suitable if the village is not opposed to the change of use of this land.
- Developing there would have little impact on ecology and wildlife compared to other site plans.
- Site not near to existing local anti-social behaviour.

#### 9.17 **Disadvantages/weaknesses:**

##### **Principle of location – 60 responses:**

- It enables Monmouthshire County Council to identify a site with minimum effort by simply tagging onto the RLDP, rather than working to identify the best sites in Monmouthshire.
- There are sparse amenities within walking distance.

##### **Green and open spaces – 16 responses:**

- The proposal will result in the loss of publicly owned agricultural land and green spaces.

##### **Traffic and road safety – 123 responses:**

- There is no footpath which makes walking on the road very hazardous.
- Additional vehicles entering and exiting a future site on the road would worsen this situation.
- That stretch of the A48 cars can go as fast as 60mph. There have been 'near misses' of pedestrians almost being run over.

##### **Noise – 34 responses:**

- Busy roads in the proximity and noise from the nearby M48 motorway (even if it is a quieter motorway than the M4).

##### **Impact on existing neighbourhoods – 56 responses:**

- Too close to existing developments and the A48.

- Crick is a very small community with no amenities or services. The creation of additional residents will have a big impact on existing residents.
- More rural location making integration with the community more difficult.
- Fear of increased crime in the area, and with reduced police presence.

**Habitat loss – 6 responses:**

- We should not be using up green belt that we will need for food production for generations to come.
- We need greenbelt and farmland to assist with reduction of CO2 and net zero goals.

**Pollution – 38 responses:**

- The potential damage to land due to unlawful fly-tipping.

**Flooding risk – 7 responses:**

- A lot of water drains away from Ballan Wood.
- Crick area is prone to flooding.

**Tourism – 9 responses:**

- There were a number of discriminatory views expressed through the consultation. These comments have not been included and have been discounted.

**Property values – 10 responses:**

- Concern about house prices decreasing as a result of this development. Suggestion that community tax being reduced accordingly.

**Overdevelopment of area – 44 responses:**

- Crick already has two Traveller sites providing accommodation for 7/8 families. A further development provided for approximately 6 families will mean that a high percentage of the area is given over to Travellers and create an imbalance in population.
- The addition of a Traveller's site could rise local services being overstretched. They are already under pressure especially with the addition of the hundreds of homes under construction in the area.
- With the recent Enzo estate and Redrow in Sudbrook, the Lovell estate, and Nant y Castell in Caldicot, these are already adding a lot of numbers to the area.

- Recent developments in Portskewett and Sudbrook has already increased population with no amenities added such as shops, doctors, school, pharmacy, activities for kids, etc.

## Additional Oak Grove Farm comment

9.18 In addition to the above, the only comment which was clearly identified for Oak Grove Farm rather than Bradbury Farm is:

- This proposed site is not part of Oak Grove Farm, it is situated as part of what was Severn Farm and now farmed by the tenants of Parkwall Farm **(9 responses)**.

## Other comments

- **Planning policy** - The proposal is in direct contradiction to a number of policies in the current LDP, for example, Policy DES2 - Areas of Amenity Importance.
- **Community cohesion** - If the idea is to integrate the gypsies and Travellers into the community and get the population to accept them, why hide them away from view at one end of town in an unsuitable site?
- **Geographic concentration of site** - Questions were raised about the justification of choosing sites in a small geographic area when Monmouthshire is a large county with lots of land potentially more suitable. There is a lack of parity for changes in the three market towns of Monmouthshire, namely Chepstow, Monmouth, and Abergavenny. The three main market towns are having to meet increasing demands in health, education, and road improvement budgets. The needs of Chepstow residents are relatively being treated differently.
- **RAG process** - There are concerns about the lack of detail in the RAG report for the proposed sites.
- **Consultation process** - Some have questioned the approach of being asked about multiple sites as the decision should be mutually exclusive and should not 'play one site off against another'. They consider this as unfair to those involved, and it could be perceived as being very divisive within a local community.
- **Consultation publicity** - Would like future consultations to be promoted using more traditional means rather than rely on social media and digital channels.
- **Alternative sites assessment** - The Council requested residents to send in ideas for alternative sites, yet the Council has not reported back on this. At least one resident sent into the Council a list of 11 alternative sites, five of which were brownfield and one underutilised council land.

# 10. Summary and next steps

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10.1 This consultation report sets out the actions taken by Monmouthshire County Council to undertake the early-stage consultation both with key stakeholders and the community.

10.2 The level of feedback from this consultation has been high and very consistent, in terms of the number of people as well as what they have to say.

10.3 The most common themes fed back were:

- For Langley Close: pollution; noise; impact on existing neighbourhood; habitat loss; and principle of location
- For Bradbury Farm and Oak Grove Farm\*: traffic and road safety; principle of location; impact on existing neighbourhood; overdevelopment of area; and pollution.

*\* Due to site locations being near to each other, feedback provided for Bradbury Farm and Oak Grove Farm were similar and therefore grouped in this report.*

10.4 Feedback from this consultation will inform the Council's ongoing evaluation of the three sites in question and the next stage of the site identification process.

10.5 Running alongside the review of the consultation is site evaluation work of each of the three sites. External specialists have been appointed to undertake:

- Noise assessments
- Ecology assessments
- Land contamination assessments
- Air quality assessments, and
- Transport assessments.

10.6 The findings of these assessments will be considered by the Council's Ecology, Highways and Environmental Health teams who will be asked to make recommendations on the basis of the findings.

10.7 In addition, the Council is continuing to proactively engage with households who own private land about the possibility of obtaining planning permission for pitch provision.

10.8 The outcome of these three strands of work will inform a recommendation of whether any of the three sites are suitable to be recommended to Cabinet for inclusion in the emerging Replacement Local Development Plan. This recommendation will be reported to the Council's Place Scrutiny Committee

for initial consideration by elected members. Cabinet will then decide which site(s) will be included in the Replacement LDP Deposit Plan.

10.9 Further consultation will be undertaken as part of the Replacement Local Development Plan 2018 – 2033 Deposit Plan in 2024. There will also be further consultation as part of any future individual planning applications.

## Statement from the Council

10.10 The Council would like to pass on its thanks and appreciation to everyone who has shown an interest in the site identification process and who has provided comments and views about the suitability of the individual pieces of land at Langley Close, Bradbury Farm and Oakgrove Farm for possible future use as Gypsy & Traveller pitches.

# 11. Appendices

## Appendix 1 Consultation programme

### Project Programme



**Project** Gypsy, Roma and Traveller site identification consultation  
**Client** Monmouthshire County Council  
**Date** 12 October 2023

Dates	Actions required
13/10/2023	Prepare consultation plan and key messages, project risks
13/10/2023	Preparation of communications materials including press release, social media toolkit, poster and webpage content
16/10/2023	Organise consultation events
17/10/2023	Draft copy to client: press release, social media toolkit, posters
18/10/2023	Client review copy
19/10/2023	Finalise copy and issue for Welsh translation
24/10/2023	Launch of 6-week consultation: Issue press release and website live <ul style="list-style-type: none"><li>● Social media - Launch</li><li>● Social media to provide website update with exhibition material</li><li>● Social media to promote event 1</li><li>● Social media to promote event 2</li></ul>
22/11/2023	Event 1: Portskewett Church Hall, Portskewett,
23/11/2023	Event 2: Magor and Undy Community Hub, Major <ul style="list-style-type: none"><li>● Social media - thanks for coming give feedback</li><li>● Social media - deadline</li></ul>
05/12/2023	End of 6-week consultation
18/12/2023	Data analysis
20/12/2023	Consultation report drafted

## Appendix 2 Feedback form (paper)



### Monmouthshire County Council

### Gypsy & Traveller Site Consultation Form

Monmouthshire County Council (MCC)'s Gypsy & Traveller site identification process has identified three sites that the Council would like your views on. A public consultation for 6 weeks will run from **9<sup>th</sup> November 2023 to 22<sup>nd</sup> December 2023**. This is being run by [Grasshopper Communications](#) on MCC's behalf.

Please use this form to respond to the consultation using additional sheets as necessary. If you would like to provide further supporting information, please send this via email using the details below. The questions have been designed to inform the Council's continued evaluation of the three sites and their potential suitability for Gypsy & Traveller sites. Further copies of the form can be obtained from the Housing & Communities Team and the Council's website or you can photocopy this form.

The Council has a zero tolerance to the use of any racist, discriminatory or prejudiced remarks or feedback. Any such comments will not be included in the consultation and will be returned to the author.

### How to submit your response

To assist with the efficient processing of responses we would ask you to submit your comments electronically via the MCC website: <https://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/>.

Alternatively, forms can be: emailed to [housingrenewals@monmouthshire.gov.uk](mailto:housingrenewals@monmouthshire.gov.uk); handed into Caldicot Hub (located in Caldicot Library, Woodstock Way, Caldicot, NP 26 5DB); or posted to Housing & Communities, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA.

All responses must be received by **22<sup>nd</sup> December 2023**. For postal forms responses must be received by **Tuesday 2<sup>nd</sup> January 2024**.

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## PART 1: Tell us about you

The survey includes some questions about you. Some of the questions may not be important or relevant to you, but they are important to the person with that characteristic. Completing these questions will help us analyse results accurately as well as helping us make sure we reach a representative section of the Monmouthshire population. If you choose not to answer them, we will still include your views in our analysis.

Your details	
Name	
Post code	
Phone no.	
Email	

Please tell us which part of the community you are representing (please tick one)		
Resident		
Business/Agency		Name of Business/Agency
Community Council Member		
MCC Elected Member		
MP/MS		
Other		Please specify

What age group do you belong to? (please tick one)			
16-24		25-34	
35-44		45-54	
55-64		65+	
Prefer not to say			



Gender? (please tick one)	
Female	
Male	
Other gender identity	
Prefer not to say	
Is the gender you identify with the same as your sex registered at birth?	[Yes / No]

What is your ethnicity? (please tick one)			
<b>White</b>			
Welsh		English	
Northern Irish		Scottish	
British		Irish	
Gypsy, Roma or Irish Traveller		Any other White background	
<b>Asian or Asian British</b>			
Bangladeshi		Chinese	
Indian		Pakistani	
Any other Asian background			
<b>Black, African, Caribbean or Black British</b>			
African		Caribbean	
Any other Caribbean background			
<b>Mixed or Multiple ethnic groups</b>			

White and Asian		White and Black African	
White and Black Caribbean		Any other Mixed or Multiple ethnic background	
<b>Other ethnic group</b>			
Arab		Any other ethnic group	
<b>Prefer not to say</b>			

<b>Do you consider yourself to have a disability? (please tick one)</b>	
Yes	
No	
Prefer not to say	

## PART 2: Your comments

Please set out your comments in full, this will help us to understand your views and any issues you raise on suitability.

The Council has a legal and moral duty to meet the pitch needs of Gypsy & Travellers living in Monmouthshire. The Council is looking to identify land in sustainable locations where Gypsy & Traveller households can establish homes.

The Council's vision for meeting this duty and providing sites is:

- The Council recognises that safe, culturally appropriate accommodation is necessary for individuals to flourish in other parts of their lives.
- Small Gypsy and Traveller sites, ideally occupied by only one family or household.
- Each site will be a maximum of six pitches and be well designed and landscaped.
- To provide places for families who are already living and well-integrated in local life in Monmouthshire and have an identified need.
- Only a small amount of land has been proposed to be allocated from each of the three sites:
- *Do you have any comments on this vision?*

Please tell us what you think about the advantages/strengths of the site in Langley Close, Magor

**Please tell us what you think about the disadvantages/weaknesses of the site in Langley Close, Magor**

**Please tell us what you think about the advantages/strengths of the site in Bradbury Farm, Crick**

**Please tell us what you think about the disadvantages/weaknesses of the site in Bradbury Farm, Crick**

**Please tell us what you think about the advantages/strengths of the site in Oak Grove Farm, Crick**

**Please tell us what you think about the disadvantages/weaknesses of the site in Oak Grove Farm, Crick**

**Do you have any other comments on any of the sites**

**How useful was the information received during this consultation (please tick one)**

Very useful	<input type="checkbox"/>	Useful	<input type="checkbox"/>
Okay	<input type="checkbox"/>	Not very useful	<input type="checkbox"/>
Not useful at all	<input type="checkbox"/>		<input type="checkbox"/>

**Do you have any further comments?**



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

MCC comply with all legislation governing the protection of personal information, including the Data Protection Act 2018 and the UK: General Data Protection Regulations (GDPR). The personal information you supply in this form will remain strictly confidential and will only be shared with Grasshopper Communications for purposes of facilitating consultation on land for potential Gypsy & Traveller site provision. This information will be held and used in line with our retention policy. For more information about privacy, please visit: <https://www.monmouthshire.gov.uk/your-privacy/> or <https://grasshopper-comms.co.uk/privacy-policy/>.

**THANK YOU FOR YOUR RESPONSE TO THIS CONSULTATION**

## Appendix 3 Consultation launch media release

Gypsy and Traveller pitches in Monmouthshire

# Gypsy and Traveller pitches in Monmouthshire

Article last updated: 7th November 2023, Under category: [News](#)

Following a full council meeting on the 26th of October, Monmouthshire County Council will proceed with the Cabinet's decision to undertake a public consultation on the proposed council owned sites for possible use as Gypsy and Traveller pitches for local families in need of permanent place to live.

A six-week public consultation is expected to begin on the 9th of November, where residents, businesses, local stakeholders and the Gypsy and Travellers community can provide feedback on the proposed sites.

Along with comprehensive information on our website (to be published shortly:

<https://www.monmouthshire.gov.uk/gypsy-and-travellers/>), residents can attend public drop-in sessions at Church Hall, Portskewett, on the 22nd of November between 4.00pm – 7.00pm and at Magor and Undy Community Hub on the 23rd of November between 4.00pm – 7.00pm to find out more about the Council's obligations and considerations. Further drop-in sessions are also planned for the Gypsy and Traveller community. Additional information on the public drop-in sessions will be made available on our website.

Monmouthshire County Council has a legal and moral duty to provide sites within its Replacement Local Development Plan to meet identified needs. No decision has been made on which site(s) will be put forward. The public consultation will fully allow participants to gain information and provide feedback.

Monmouthshire County Council, Deputy Leader and Cabinet Member for Planning and Economic Development, Cllr Paul Griffiths said: "The public consultation will allow residents, businesses, local stakeholders and the Gypsy and Travelling community an opportunity to voice their opinion on the proposed sites. Please take this opportunity to engage with officers and councillors on what matters to you. I would urge everyone to read the information that will be available shortly to gain an understanding of the proposals."

Tags: [Monmouthshire](#), [news](#)

## Appendix 4 Drop in events poster advert

# Gypsy and Traveller sites consultation

Monmouthshire County Council would like to hear your views on the proposed Gypsy and Traveller sites in the Magor, Portskewett and Crick catchments.

Come to a drop-in event to learn more about what is proposed:

**Wednesday 22 November**  
**4pm-7pm**

Portskewett Church Hall,  
Crick Rd, Portskewett,  
Caldicot NP26 5UL

**Thursday 23 November**  
**4pm-7pm**

Magor and Undy Community  
Hub, Main Road, Undy,  
Caldicot NP26 3GD

Please send in your feedback  
by **Friday 22 December 2023**.



monmouthshire  
sir fynwy

Go to the  
consultation  
website:





# Appendix 5 Social media toolkit



## Monmouthshire County Council Gypsy, Roma and Traveller sites consultation Social media toolkit

Supporting images to be agreed with Monmouthshire County Council and Travelling Ahead.

### Post 1: Launch

Proposed date – 9 November

<b>Facebook</b>	Today, we are launching our public consultation on the proposals to develop Gypsy, Roma and Traveller sites in three locations near Magor and Crick.  Read more in our press release: <a href="#">[LINK TO NEWS STORY]</a>
<b>Twitter/X</b>	Today, we are launching our public consultation on the proposals to develop Gypsy, Roma and Traveller sites in three locations near Magor and Crick.  Read more in our press release: <a href="#">[LINK TO NEWS STORY]</a>  (205 characters)

### Post 2: Website update with exhibitions materials

Proposed date – 14 November

<b>Facebook</b>	We are seeking your views on our proposals to develop Gypsy, Roma and Traveller sites near Magor and Crick. All the information on how you can get involved is here: <a href="#">[LINK TO MAIN PROJECT PAGE]</a>
<b>Twitter/X</b>	We are seeking your views on our proposals to develop Gypsy, Roma and Traveller sites near Magor and Crick. All the information on how you can get involved is here: <a href="#">[LINK TO MAIN PROJECT PAGE]</a>  (190 characters)

### Post 3: Event 1

Proposed date – 17 November

<b>Facebook</b>	<p>Have your say on our proposals to develop Gypsy, Roma and Traveller sites. We have two drop-in events taking place in the next week, the first of which is at Portskewett Church Hall.</p> <p>We look forward to hearing your thoughts.</p> <p>Wednesday 22 November, 4pm-7pm.</p> <p>[LINK TO PROJECT PAGE]</p>
<b>Twitter/X</b>	<p>Have your say on our proposals to develop Gypsy, Roma and Traveller sites. We have two drop-in events taking place in the next week, the first being at Portskewett Church Hall.</p> <p>We look forward to hearing your thoughts.</p> <p>Wednesday 22 November, 4pm-7pm.</p> <p>[LINK TO PROJECT PAGE]</p> <p><i>(274 characters)</i></p>

### Post 4: Event 2

Proposed date – 20 November

<b>Facebook</b>	<p>We have organised a drop-in event at Magor and Undy Hub, so you can learn more about our proposals to develop Gypsy, Roma and Traveller sites in the local area.</p> <p>We look forward to hearing your thoughts.</p> <p>Thursday 23 November, 4pm-7pm</p> <p>[LINK TO PROJECT PAGE]</p>
<b>Twitter/X</b>	<p>We have organised a drop-in event at @MagorandUndyHub, so you can learn more about our proposals to develop Gypsy, Roma and Traveller sites in the local area.</p> <p>We look forward to hearing your thoughts.</p>

	<p>Thursday 23 November, 4pm-7pm</p> <p>[LINK TO PROJECT PAGE]</p> <p>(263 characters)</p>
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### Post 5: Thanks for coming

Proposed date – 27 November

<b>Facebook</b>	<p>Thank you to those who attended our two drop-in events last week. Your views will go a long way in helping us in our final plans to develop sustainable Gypsy, Roma and Traveller sites that will suit all communities involved.</p> <p>If you weren't able to attend either event, you still have time to have your say: [LINK TO PROJECT PAGE]</p>
<b>Twitter/X</b>	<p>To those who attended our drop-in events last week, thank you. Your views will go a long way in helping us develop Gypsy, Roma and Traveller sites to suit all communities.</p> <p>If you couldn't attend either event, you still have time to submit your views: [LINK TO PROJECT PAGE]</p> <p>(275 characters)</p>

### Post 6: Deadline

Proposed dates – 6 December / 13 December / 20 December

<b>Facebook</b>	<p>The deadline to submit your views on the proposed Gypsy, Roma and Traveller sites in this consultation period is 22 December. If you haven't already, please submit your views here:</p> <p>[LINK TO FEEDBACK FORM]</p> <p>There will be further opportunities to have your say after this current process. Further consultation will be undertaken as part of the Replacement Local Development Plan 2018 – 2033 Deposit Plan consultation in 2024. There will also be further consultation as part of the planning application process.</p>
<b>Twitter/X</b>	<p>The deadline to submit your views on the proposed Gypsy, Roma and Traveller sites in this consultation period is 22</p>
	<p>December. If you haven't already, please submit your views here:</p> <p>[LINK TO FEEDBACK FORM]</p> <p>(205 characters)</p>

## Appendix 6 Exhibition boards

# Welcome

## Gypsy and Traveller sites consultation

### Welcome to this early consultation event.

Monmouthshire County Council has a legal and moral duty to ensure everyone has access to good quality accommodation. The Council recognises that safe, culturally appropriate accommodation is necessary for individuals to flourish in other parts of their lives.

In this drop-in event, you are able to learn more about the Gypsy and Traveller site consultation process, the proposed locations, and why it is important the Council acts.




Picture references: Photos of Greenfields Way site in Weston-Super-Mare. Taken from the 'Places We're Proud Of' report published by the National Policy Advisory Board on Gypsy and Traveller Housing, January 2021.


Feel free to ask any questions you have. You will also get the chance to meet Travelling Ahead, an organisation that supports Gypsy and Traveller communities.



### Contact:

 [HousingRenewals@monmouthshire.gov.uk](mailto:HousingRenewals@monmouthshire.gov.uk)

 01633 644644

 [www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Process

## Gypsy and Traveller sites consultation

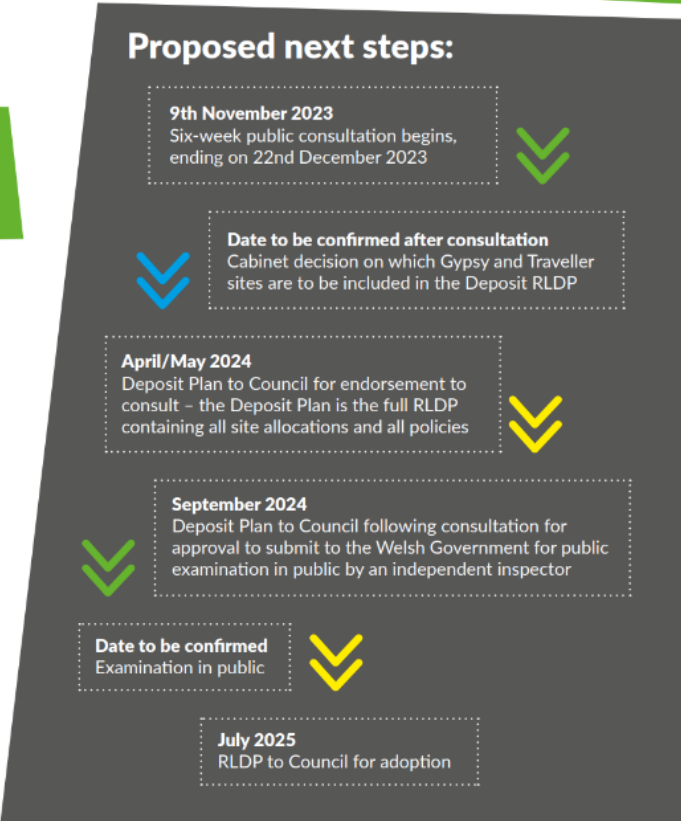
The process of allocating Gypsy and Traveller sites is a lengthy process and takes several years before sites can be developed.

**The Council's 2021 Gypsy and Traveller Accommodation Assessment (GTAA) has identified a need for an additional 13 pitches for the Gypsy and Traveller families already living in Monmouthshire.**

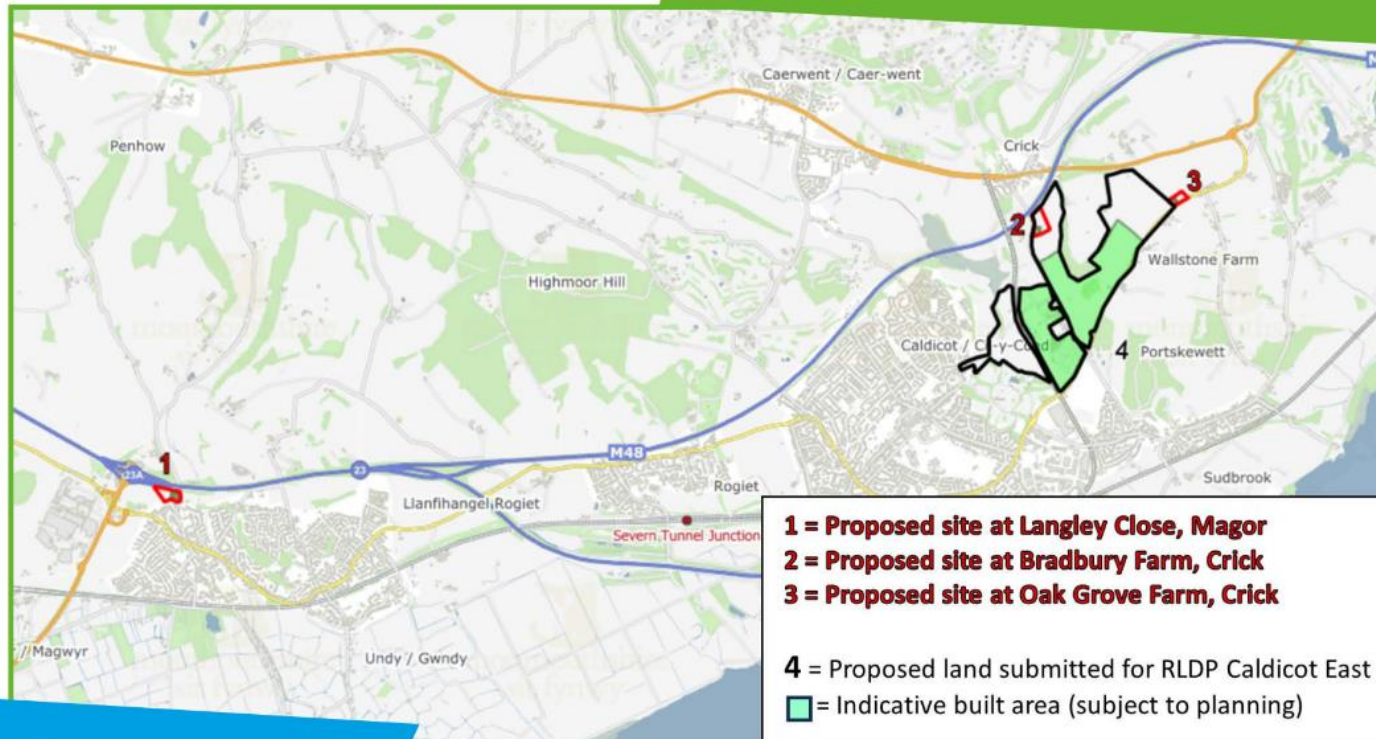
- Three Council owned sites that have been identified as potentially suitable to meet the current needs for the Gypsy and Traveller community.
- The Council is holding a six-week public consultation on these sites. Cabinet will consider the feedback from this consultation and decide which site(s) will be allocated in the Replacement Local Development Plan 2018 - 2033.
- Monmouthshire County Council has worked closely with Travelling Ahead: Gypsy and Traveller Advice and Advocacy Service to co-design a consultation

process to enable the Gypsy and Traveller communities to be well represented during this process.

- This consultation period is the first stage in an ongoing process. Further consultation will be undertaken as part of the Replacement Local Development Plan (RLDP) 2018 - 2033 and Deposit Plan in 2024. There will also be further consultation as part of any future planning applications.
- A strategic site located in Caldicot East has been proposed to be allocated for development within the RLDP Deposit Plan.



# Gypsy and Traveller sites consultation



# Feedback

## Gypsy and Traveller sites consultation

### How to provide feedback and get in touch

We will ensure that everyone in the community has an equal and safe space to participate in the consultation process. We will have a zero-tolerance policy to any discriminatory or racist comments or behaviour. Any responses that include discriminatory or racist comments will not be considered.

The Council will listen to all members of the community, feedback will be summarised and reflected in the consultation report.



Please submit your comments electronically via **the MCC website, or the QR code**

### Alternatively, forms can be:



emailed to **housingrenewals@monmouthshire.gov.uk**



handed into **Caldicot Hub**

All responses must be received by **22nd December 2023.**



### Contact:



HousingRenewals@monmouthshire.gov.uk



01633 644644



[www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Profile: Langley Close

## Site Size:

Approx 23,431m<sup>2</sup>

## Pitch Capacity:

Sufficient to meet MCC's pitch needs\*

\*It is recommended no more than 5 or 6 pitches



## Gypsy and Traveller sites consultation



### General Description:

- Urban
- Access off St Brides Road
- The land forms part of the Council's County Farms estate and is occupied via a grazing license. It is anticipated this license would need to be terminated/amended should the site be supported for this use
- Residential properties adjoining southern boundary. M4 to the north, open land to east and west
- Tree belt around the site





# Profile: Oakgrove Farm

## Gypsy and Traveller sites consultation

### Site Size:

Approx 7,976 m<sup>2</sup>

### Pitch Capacity:

Sufficient to meet MCC's pitch needs\*

\*It is recommended no more than 5 or 6 pitches



### General Description:

- Rural
- Situated on B4245 approximately a mile from the edge of Caldicot
- The land forms part of the Council's County Farms estate and is occupied via an agricultural tenancy. It is anticipated this tenancy would need to be amended should the site be supported for this use
- Land currently used for agriculture



### For more information:

[www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Profile: Bradbury Farm

## Gypsy and Traveller sites consultation

**Site Size:**  
Approx 18,022 m<sup>2</sup>

**Pitch Capacity:**  
Sufficient to meet MCC's pitch needs\*  
\*It is recommended no more than 5 or 6 pitches



**General Description:**

- Rural
- Situated directly off Crick Road
- The land forms part of the Council's County Farms estate and is occupied via an agricultural tenancy. It is anticipated this tenancy would need to be amended should the site be supported for this use
- M48 to the north elevation of the land
- Hedgerow and fencing to east, west and south elevation



**For more information:**  
[www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Vision

The Council has a legal and moral duty to meet the pitch needs of Gypsy & Travellers living in Monmouthshire. The Council is looking to identify land in sustainable locations where Gypsy & Traveller households can establish homes.

## Gypsy and Traveller sites consultation

### The Council's vision for meeting its duty and providing sites is:



The Council recognises that safe, culturally appropriate accommodation is necessary for individuals to flourish in other parts of their lives.

Small Gypsy and Traveller sites, ideally occupied by only one family or household.

Each site will be a maximum of six pitches and be well designed and landscaped.

To provide places for families who are already living and well-integrated in local life in Monmouthshire and have an identified need.

Only a small amount of land has been proposed to be allocated from each of the three sites.



### For more information:

[www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Key documents for download

# Gypsy and Traveller sites consultation

 **RAG, updated on 26th July 2023**  
Monmouthshire County Council uses RAG (Red, Amber, Green) reports to measure the progress of a given project which would influence their next phases.

 **Frequently Asked Questions**

 **The Gypsy and Traveller Assessment 2021**



 **Consultation Website**


 **Welsh Government - Guidance and Planning**



Picture references: Photos of Greenfields Way site in Weston-Super-Mare and Brooks Green, Harford. Taken from the 'Places We're Proud Of' report published by the National Policy Advisory Board on Gypsy and Traveller Housing, January 2021.

 **monmouthshire**  
sir fynwy

**For more information:**  
[www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/](http://www.monmouthshire.gov.uk/gypsy-and-traveller-sites-consultation/)



# Appendix 7 Photos to support the consultation

## Appendix 7a

### Mill 1 St Brides





Appendix 7b

St Brides Road



MONMOUTHSHIRE COUNTY COUNCIL'S LAND EVALUATION -Appendix 1

Gypsy & Traveller Site Identification – MCC Land Evaluation											
<p><b>MCC Land – Langley Close, Major</b></p> <p><b>Site Size – Approx 23.43ha*</b>      <b>Pitch Capacity – sufficient to meet MCC's pitch needs*</b></p> <p>*The site has the capacity for additional pitches above the identified need, but these are not required. Large sites and provision above 5 or 6 units are not recommended.</p> <p><b>General Description</b></p> <ul style="list-style-type: none"> <li>• Upton</li> <li>• Access off St Brides Road</li> <li>• The land forms part of the Council's County Farms estate and is occupied via a grazing licence. It is anticipated this licence would need to be terminated/terminated should the site be supported for this use</li> <li>• (Woodland) prospective adjacent woodland boundary. ME to the north, open land to west and south</li> <li>• Tree belt around the site</li> </ul> <p><b>Ward – Major West</b></p>											
<p><b>Photo's</b></p> 	<table border="0"> <tr> <td data-bbox="721 766 944 1012"> <p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Level land</li> <li>• Scope for expansion (within the context of not creating a large site)</li> <li>• Ability to create a margin between houses and M4</li> <li>• New access can be created on St Brides Close</li> </ul> </td> <td data-bbox="944 766 1232 1012"> <p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Greenfield</li> <li>• Mineral safeguarding area</li> <li>• Existing access is not suitable</li> <li>• Traffic and noise assessments/surveys would be needed given the proximity of the M4 - a TAN 11 Noise assessment to establish whether the site is suitable having regard to the existing background noise levels.</li> <li>• Woodland along M4 corridor may support Dormouse, reptiles, birds and Scares</li> <li>• Adjacent to existing homes</li> <li>• There would be a loss to the current grazing licence holder who would need to be served notice to terminate/terminate their existing licence.</li> </ul> </td> </tr> <tr> <td data-bbox="721 1025 944 1057"> <p><b>Opportunities</b></p> </td> <td data-bbox="944 1025 1232 1057"> <p><b>Threats (Risk)</b></p> <ul style="list-style-type: none"> <li>• Close to M4 – air and noise pollution.</li> </ul> </td> </tr> </table>	<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Level land</li> <li>• Scope for expansion (within the context of not creating a large site)</li> <li>• Ability to create a margin between houses and M4</li> <li>• New access can be created on St Brides Close</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Greenfield</li> <li>• Mineral safeguarding area</li> <li>• Existing access is not suitable</li> <li>• Traffic and noise assessments/surveys would be needed given the proximity of the M4 - a TAN 11 Noise assessment to establish whether the site is suitable having regard to the existing background noise levels.</li> <li>• Woodland along M4 corridor may support Dormouse, reptiles, birds and Scares</li> <li>• Adjacent to existing homes</li> <li>• There would be a loss to the current grazing licence holder who would need to be served notice to terminate/terminate their existing licence.</li> </ul>	<p><b>Opportunities</b></p>	<p><b>Threats (Risk)</b></p> <ul style="list-style-type: none"> <li>• Close to M4 – air and noise pollution.</li> </ul>						
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LANGLEY CLOSE – CONTEXT – IMAGERY SOURCE GOOGLE EARTH -- Appendix 2

Langley Close Site – Part of Gwent Levels. Location within Magor – North West corner only 10m from M4 / J23A. Grade 2 listed building (Woodland House) only 40m from site. Existing properties only 48m from tree buffer. SINC only 70m. Field is split into 3 separate smaller fields by hedgerows. No reasonable buffer can be created to any of these.



'Gateway to Wales' - View from M4 bridge over St Brides Road. Site is immediately behind trees which provides little screening in winter.





M4 Westbound at J23A Magor showing raised slip road and idling traffic. A typical day of noise and air pollution.



'Gateway to Wales' - view towards site from slip road



ST BRIDES ROAD – THE SITE LOCATION (LANE RUNS BETWEEN B4245 AND A48) - IMAGERY SOURCE GOOGLE EARTH - Appendix 3

Langley Close site. Existing Access On Bend. Note approach to 60mph zone. Single track road



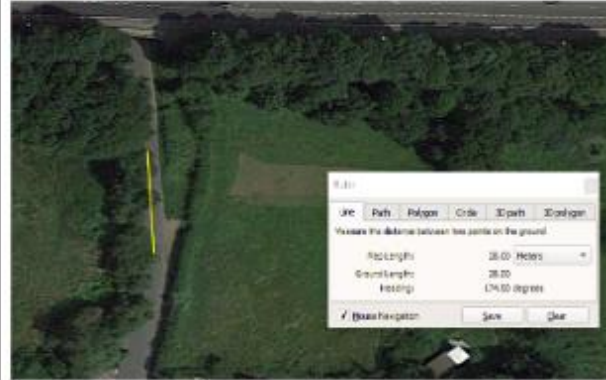
New access has to go on this stretch – note narrowness of road and bridge under M4. Also no footpath – danger for pedestrians especially children and mobility impaired.



Low narrow bridge under M4 and blind bend. M4 is raised, slip road is raised further.



New access must be on straight part of road. Max 28m visibility in either direction due to 2 blind bends. Trees also block view. Cannot comply with Visibility Splay and Sight Stopping Distance requirements. Doesn't meet highway safety regs Manual for Streets 2 and TAN18



[AIR POLLUTION DATA – SOURCE NAEI WEB SITE-Appendix 4](#)

#### AIR POLLUTANTS

DATA RETRIEVED FROM THE NATIONAL ATMOSPHERIC EMISSIONS INVENTORY (NAEI) WEB SITE. PART FUNDED BY THE WELSH GOVERNMENT

THE NAEI COMPILES ESTIMATES OF EMISSIONS TO THE ATMOSPHERE FROM UK SOURCES SUCH AS CARS, TRUCKS, POWER STATIONS AND INDUSTRIAL PLANTS. THE FOLLOWING HAZARDOUS AIR POLLUTANTS ARE ALL IN THE RED CATEGORY IN THE AREA BETWEEN JUNCTION 29A AND LANGLEY CLOSE

- ARSENIC
- CALCIUM
- CHROMIUM
- CO2 AS CARBON
- COPPER
- HYDROGEN CHLORIDE
- LEAD
- MERCURY
- NICKEL
- PARTICULATE MATTER 10 AND 2.5
- VANADIUM AND ZINC

A NUMBER OF THESE AIR POLLUTANTS CAUSE RESPIRATORY DAMAGE, KIDNEY AND BONE DAMAGE WITH HIGH LEAD LEVELS KNOWN TO CAUSE LEARNING DIFFICULTIES.

NAEI UK National Atmospheric Emissions Inventory  
<https://naei.berr.gov.uk/>



## NOISE POLLUTION

DATA RETRIEVED FROM THE EXTRIUM WEB SITE.

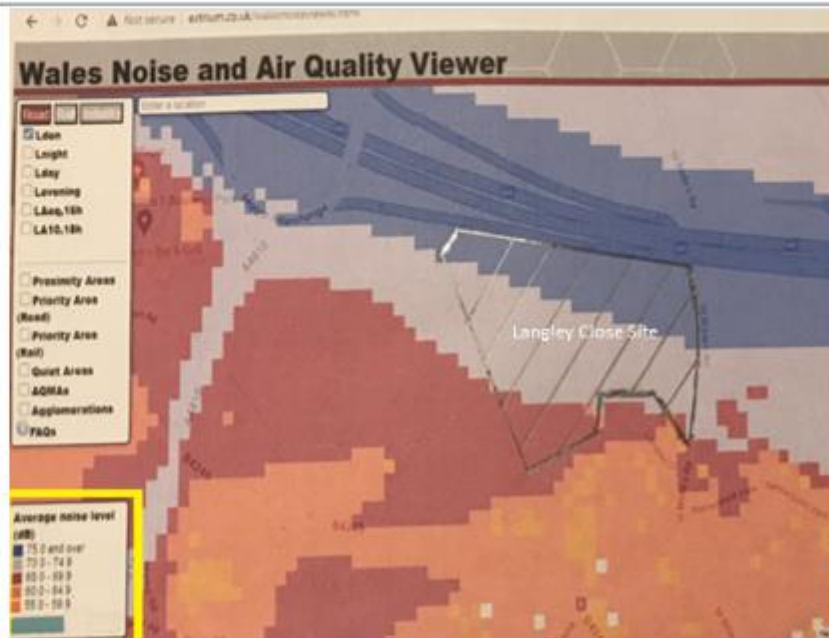
BASED ON DATA MOST RECENTLY PUBLISHED BY WELSH GOVERNMENT IN 2017, I.E. BEFORE REMOVAL OF TOLLS AND INCREASED TRAFFIC (REPORTED 16% INCREASE IN FIRST YEAR).

THE VIEWERS SHOW NOISE LEVELS FOR ROADS AND RAILWAYS AND INDUSTRIAL NOISE LEVELS.

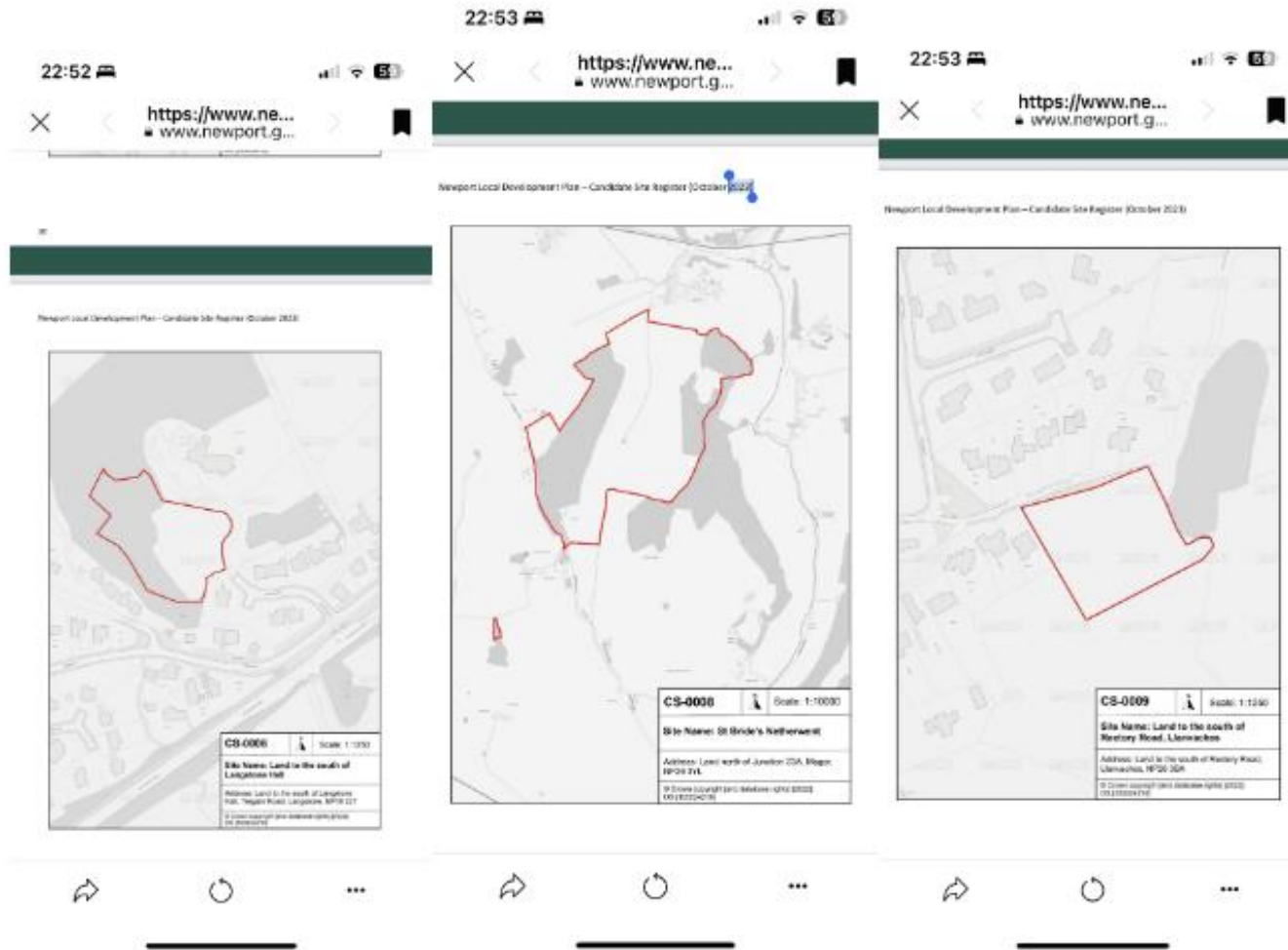
MOST OF THE LANGLEY CLOSE SITE IS OVER 70DB AND ONE THIRD OF THE SITE EXCEEDS 75DB WHICH IS THE HIGHEST (SHOWN IN DARK BLUE)

SECTION 7.7.3.2 OF BS 8233:2014 ENTITLED 'DESIGN CRITERIA FOR EXTERNAL NOISE' STATES; "FOR TRADITIONAL EXTERNAL AREAS THAT ARE USED FOR AMENITY SPACE, SUCH AS GARDENS AND PATIOS, IT IS DESIRABLE THAT THE EXTERNAL NOISE LEVEL DOES NOT EXCEED 50 DB L<sub>AEQ,T</sub> WITH AN UPPER GUIDELINE VALUE OF 55 DB.

Wales Noise and Air quality Viewer:  
<http://extrium.co.uk/walesnoiseviewer.html>



IMAGERY SOURCE -Newport Local Development Plan – Candidate Site register (october 2023) - Appendix 5- 3 pages maps





**CS-0014** Scale: 1:4000  
**Site Name:** Land north of A48, Langstone  
**Address:** Land off the A48, Langstone, Newport, NP18 2JH  
© Crown copyright and database right (2023) OS 100042162



**CS-0014** Scale: 1:4000  
**Site Name:** Land south of A48, Langstone  
**Address:** Land off the A48, Langstone, Newport, NP18 2JH  
© Crown copyright and database right (2023) OS 100042162



**CS-0016** Scale: 1:5000  
**Site Name:** Land south of Brookwood  
**Address:** Land South of Major Road, Langstone, Newport, NP18 2JH  
© Crown copyright and database right (2023) OS 100042162

24

25

25



22:57



22:58



https://www.ne...  
www.newport.g...

https://www.ne...  
www.newport.g...

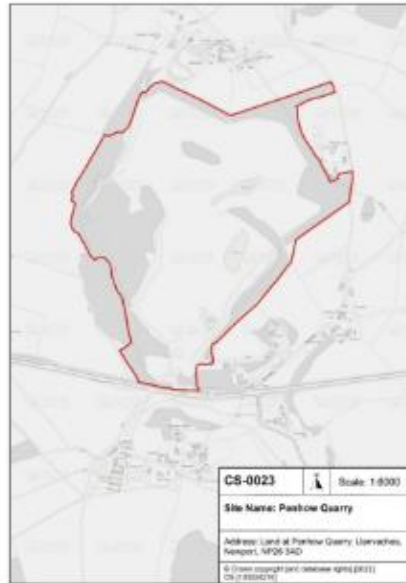
Newport Local Development Plan – Candidate Site Register (October 2023)



26

Newport Local Development Plan – Candidate Site Register (October 2023)

Newport Local Development Plan – Candidate Site Register (October 2023)



27



Appendix 7d

river





## Appendix 7e

Fig 1. Lorry on left of picture having had to reverse into Langley Close, having caused traffic disruption in St. Brides Road. Note Volvo car unable to pass proposed site entrance as it is single track at that point.



Fig 2. Another lorry having to turn around in St Brides Road/Langley Close



Fig 3. Lorries trying to pass each other in St Brides road. Note dangerous driving over pavement.



Fig 4A. Lorry trying to turn around in Langley Close. Note dangerous move over St Brides Road pavement



Fig 4B - Yet another lorry stuck in St Brides Road. So large it was unable to reverse safely into Langley Close so it chose to reverse into Netherwent view. BUT it still had to dangerously mount the pavement to achieve this.



Fig 5. Blind Bend on St Brides Road – Even Police cars have to drive in the middle of the road seeking visibility.



Fig 6 . Mon CC Refuse truck in middle of road near proposed site entrance – Note how it takes up much of the single track road



Fig 7 Example blind bend in St Brides Road



Fig 8. Tractor approaching blind bend near to proposed site entrance - Note how it takes up most of single track road



Fig 9 . Regular tailbacks on B4245



Fig 10 . Tailbacks on B4245



Fig 11. Water Run Off from proposed site



Fig 12 .Other flooding in St Brides Road and blind bend



Fig 13 Flooding at junction of B4245 and St Brides Road



Fig 14. Sparrowhawk in garden with kill





Fig 15. Egrets – a new visitor to the proposed site



Fig 16. Recent badger sett in middle of proposed site – Note also gradient on site i.e it is not level

