

DC/2019/00001

Residential development of 345 dwellings and associated infrastructure and landscaping

Mabey Bridge, Station Road, Chepstow

RECOMMENDATION: APPROVE

Case Officer: Kate Young

Date Registered: 02/01/19

1.0 APPLICATION DETAILS

This application is presented to Planning Committee due to there being at least five objections to the proposal

1.1 The Fairfield Mabey Site in Chepstow is identified as a Strategic Development Site under Policy SAH3 of the adopted Local Development Plan. In November 2017 outline planning permission (DC/2014/01290) was granted for redevelopment of the site to create a new neighbourhood. The access into the site was considered as part of the outline. This current reserved matters application seeks residential development of 345 dwellings and associated infrastructure and landscaping. The dwellings would be a mix of two and three storey, divided into three distinct character areas. There would be three public squares including the main one in front of Brunel House which is a Grade II Listed Building. The historic slipways would be retained and part of Slipway 4 would be used as public open space. There would be a 3m wide riverside path for pedestrians and cyclists running the length of the site; between the path and the river would be a thicket hedge and a fence. The main vehicular access into the site would be from Station Road under the Railway Bridge and there would be a secondary vehicular access linking into the adjacent Osborn's Housing Site. There would be two green corridors running east west through the site containing informal play provision and a riverside park containing a community orchard, informal play opportunities and a nautical-themed play area.

1.2 The outline application site covered an area of approximately 20 ha and comprises the former Mabey Bridge engineering works, including many industrial buildings, the former shipyard made up of four slipways, the former Beaufort Quarry (covering approximately 2.6 ha), Brunel House (currently being used as offices) and an industrial area at the far north of the site leased to Forest Sand Limited and R&B Skip Hire. The current reserved matters application does not include Brunel House, the area under the rail and road bridges, Beaufort Quarry or the land identified for Affordable Housing and employment land. The size of the current application site is therefore 19 ha of which almost 9ha would be for residential development. This equates to an average density of 15.5 dwellings per acre (39 dwellings per hectare) across the site.

1.3 The site is within the Chepstow Development Boundary and has been allocated within the LDP as a Strategic Housing Site. The boundaries of the site are formed by the River Wye to the East and the main railway line to the west. The northern point of the site abuts the Brunel Bridge carrying the railway and the A48 Bridge. Beyond this is the Osborn housing site which is currently under construction. There is an existing vehicular access into the site from Station Road which passes under a Grade II listed railway bridge. The River Wye in this location is designated as a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and a RAMSAR site.

The application is accompanied by the following documents.

Composite Planning Layout
Drainage Details
Topographical Survey
Materials Layout
Parking Matrix
Street Scenes
Adoption Plan
Site Sections
Land Use plan
Building Heights Plan
Character Zones
Movement Strategy Plan
House type Booklet
Landscaping Plans
Vehicle Tracking

1.4 Following negotiations with officers and in collaboration with Members of the Planning Delegation Panel, the design and layout of the scheme has been amended. There has been full re-consultation on these amendments.

2.0 RELEVANT PLANNING HISTORY

DC/2014/01290 Redevelopment of the site to create a new neighbourhood including: a range of new homes (apartments, houses and some sheltered accommodation for the elderly - use classes C2 and C3); new offices and workshops (use class B1); new commercial leisure facilities (use classes A1 and A3); the retention and flexible change of use of Brunel House to commercial, residential and / or community uses (use class A1, A3, B1, C2, D1 and D2); a network of open spaces including a new riverside linear park, footpaths, public open space and areas for informal recreation; highways infrastructure including accesses and paths; Approved 27/11/17

3.0 LOCAL DEVELOPMENT PLAN POLICIES

Strategic Policies

S1 Spatial Distribution of New Housing Provision
S3 Strategic Housing Sites
S5 Community and Recreational Facilities
S7 Infrastructure Provision
S12 Efficient Resource Use and Flood Risk
S13 Landscape, Green Infrastructure and the Natural Environment
S14 Waste
S16 Transport
S17 Place Making and Design

Development Management Policies

H1 Residential Development in Main Towns
CRF2 Outdoor Recreation/ Public Open Space and Allotments
SD2 Sustainable Construction and Energy Efficiency
SD3 Flood Risk
SD4 Sustainable Drainage

LC5 Protection and Enhancement of Landscape Character
GI1 Green Infrastructure
NE1 Nature Conservation and Development
EP1 Amenity and Environmental Protection
W1 Waste Reduction by Landfill or Land Raising
MV1 Proposed Developments and Highway Considerations
MV2 Sustainable Transport Access
MV3 Public Rights of Way
MV9 Road Hierarchy
MV10 Transport Routes and Schemes
DES1 General Design Considerations
SAH3 Fairfield Mabey Strategic Site

4.0 NATIONAL PLANNING POLICY

Planning Policy Wales (PPW) Edition 10

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

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

5.0 REPRESENTATIONS

5.1 Consultations Replies (initial responses)

MCC Planning Policy

The site is allocated in Policy SAH3 of the Local Development Plan for around 350 dwellings during the LDP period. It is noted the current proposal relates to 345 dwellings along with associated infrastructure and landscaping. In accordance with the outline permission (DC/2014/01290) 1.5 acres of land is provided for affordable housing.

As discussed in pre-application advice the provision of serviced employment land to 1.2 acres is considered to be acceptable, however, as noted at the pre-application discussions it would be useful if additional detail could be provided to support the planning application to demonstrate that this can accommodate 6500m² flexible working space as per the requirements of the outline permission.

Criterion b) of SAH3 of the LDP states that the serviced employment land shall include an area for four starter business units to be financed from the adjoining Osborne International redevelopment site. As noted at the pre-application meeting it has been confirmed by our solicitor that there is no obligation for the landowner to provide such a scheme within the site as they were not a signatory, the fulfilment of this part of criterion b) cannot therefore be enforced.

MCC Highways

The layout is generally acceptable but amendments are required

Layout

Generally the layout is acceptable and accords with current design principle, however at this stage I would highlight the following for further detailed consideration

The carriageway is not a constant width varying between 5.5m – 5.0m, 5.5m is required over its length. Footways are required on both sides of the prospectively adoptable highway providing a connection with the adjacent Osborne development and ensuring transport connectivity. The S106 requires a highway link and the movement plan indicates this route as a secondary route Details of connection to Osborne layout is required, Insufficient detail to determine how the junction square will operate, further detail is required to demonstrate how; Parking will be managed – the location is considered to be major attractor for residents and visitors to gain access to the river walk/coastal path. Pedestrian links from conventional footways to shared space both in the square and along the river front highway.

Parking

The principle for a reduction in parking provision is accepted in principle, but is very reliant on the overall layout design and provision of off street parking provision. Generally if parking provision is attractive to residents then it will be used, if it is not then the highway tends to be used. A balance has to be achieved between accessible off street parking and the ability for the highway to accommodate any reasonable shortfall as well able to accommodate visiting parking.

Total No. Spaces Required 1009 + 69 Visitor Parking 1078

Total No. Spaces 883 + 18 Visitor Parking = 901

Shortfall in parking = 177

The number of properties with a shortfall in parking provision is 136

The calculations s provided in the Parking Matrix appear somewhat askew, can they be revisited an adjusted as necessary and a plan provided indicating where the shortfalls are as it appears the layout has been further amended.

Network Rail

Whilst there is no objection in principle to this proposal, the developer must comply with Network Rail's engineering requirements relating to works and in the vicinity of Mill Lane rail over road bridge, also with regards to any other works which have a potential interface with the operational railway. Such requirements having been legally documented in 2011 with the then landowner.

Notwithstanding the above, I give below my comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.

FORMER BR LAND

The development appears to be located on an area of land previously under the ownership of Network Rail. Often these sites are sold and are subject to a demarcation or covenant agreement which may include particular rights in relation to the safe operation of the railway and associated infrastructure. It must be considered when Network Rail has access rights over the development site; access must not be blocked or restricted at any time. The applicant must comply with all post sale covenants in the demarcation agreement and understand the implications this will have on the implementation of this development.

Any representations made are without prejudice to those rights and obligations and on the basis that they do not imply that Network Rail's approval under the demarcation agreement will be given for the proposed development or for any part of it.

FOUNDATIONS

Network Rail offers no right of support to the development. Where foundation works penetrate Network Rail's support zone or ground displacement techniques are used the works will require specific approval and careful monitoring by Network Rail. There should be no additional loading placed on the cutting and no deep continuous excavations parallel to the boundary without prior approval.

DRAINAGE

All surface water drainage should be directed away from Network Rail's land to the public mains system. Soakaways are not acceptable where the following apply:

- Where excavations which could undermine Network Rail's structural support zone or adversely affect the bearing capacity of the ground
- Where there is any risk of accidents or other acts leading to potential pollution of Network Rail's property/infrastructure
- Where the works could adversely affect the water table in the vicinity of Network Rail's structures or earthworks.

GROUND DISTURBANCE

The works involve disturbing the ground on or adjacent to Network Rail's land it is likely/possible that the Network Rail and the utility companies have buried services in the area in which there is a need to excavate. Network Rail's ground disturbance regulations applies. The developer should seek specific advice from Network Rail on any significant raising or lowering of the levels of the site.

FENCING

If not already in place, the Developer/applicant must provide at their expense a suitable trespass proof fence (of at least 1.8m in height) adjacent to Network Rail's boundary and make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed.

SITE LAYOUT

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

CHILDRENS PLAY AREAS/OPEN SPACES/AMENITIES

Children's play areas, open spaces and amenity areas must be protected by a secure fence along the boundary of one of the following kinds, concrete post and panel, iron railing, steel palisade or such other fence approved by the Local Planning Authority acting in consultation with the railway undertaker to a minimum height of 2 metres and the fence should be not able to be climbed.

PILING

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

EXCAVATIONS/EARTHWORKS

All excavations / earthworks carried out in the vicinity of Network Rail's property / structures must be designed and executed such that no interference with the integrity of that property / structure can occur. If temporary compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Engineer should be undertaken.

SIGNALLING

The proposal must not interfere with or obscure any signals that may be in the area.

NOISE

Network Rail would remind the council and the applicant of the potential for any noise/ vibration impacts caused by the proximity between the proposed development and the existing railway, which must be assessed in the context of the National Planning Policy Framework (NPPF) and the local planning authority should use conditions as necessary. The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running and heavy freight trains.

There is also the potential for maintenance works to be carried out on trains, which is undertaken at night and means leaving the trains' motors running which can lead to increased levels of noise.

We therefore strongly recommend that all future residents are informed of the noise and vibration emanating from the railway, and of potential future increases in railway noise and vibration.

LANDSCAPING

It is recommended no trees are planted closer than 1.5 times their mature height to the boundary fence. The developer should adhere to Network Rail's advice guide on acceptable tree/plant species. Any tree felling works where there is a risk of the trees or branches falling across the boundary fence will require railway supervision.

PLANT, SCAFFOLDING AND CRANES

Any scaffold which is to be constructed adjacent to the railway must be erected in such a manner that, at no time will any poles or cranes over-sail or fall onto the railway. All plant and scaffolding must be positioned, that in the event of failure, it will not fall on to Network Rail land.

LIGHTING

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

SAFETY BARRIER

Where new roads, turning spaces or parking areas are to be situated adjacent to the railway; which is at or below the level of the development, suitable crash barriers or high kerbs should be provided to prevent vehicles accidentally driving or rolling onto the railway or damaging the lineside fencing.

METHOD STATEMENTS/FAIL SAFE/POSSESSIONS

Method statements may be required to be submitted to Network Rail's Asset Protection Engineer for prior approval of works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when

the railway is closed to rail traffic i.e “possession” which must be booked via Network Rail’s Asset Protection Engineer and are subject to a minimum prior notice period of booking of 20 weeks. The applicant will be liable for all costs incurred by Network Rail (including all possession costs, site safety supervision, asset protection presence). The applicant is reminded that Network Rail can refuse any third party works that would impact adversely on its infrastructure.

ACCESS POINTS

Where Network Rail has defined access points, these must be maintained to Network Rail’s satisfaction.

Cadw

No objection.

Having carefully considered the information provided with this planning application, we have no objections to the impact of the proposed development on the historic assets.

Outline planning consent for this development was granted to planning application 2014/01290, In responding to that application we had concerns that the development would have a significant impact on the slipways of the previous shipyard which had been determined to be of National importance and are currently in the process of being designated as scheduled monuments. Design changes to the original indicative master plan removed flood alleviation ponds from the area of the slipways in order to prevent damage to them and the detailed plan of the slipway area continues to protect them. We therefore currently have no objection to the overall current design of the proposed development: However, we are aware that various suggestions have been made for changes to the layout of the proposed development. If any of these changes are made in the vicinity of the slipways then Cadw should be re-consulted on this application.

Natural Resources Wales (NRW)

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement – modifications to the proposed layout are required to demonstrate that the proposal will not be detrimental to the maintenance of the favourable conservation status of Bats (European Protected Species).

Requirement: European Protected Species

Approval of a reserved matters application is sought for 325 dwellings with the relevant reserved matters to include appearance, landscape, layout and scale. We comment as follows.

We note that the bat house, which is located on the western boundary of the site adjacent to the railway line, is proposed to be fully enclosed by housing, with the rear gardens of the housing fronting the bat house.

We consider that the layout of the proposals is inappropriate because:

- i. Connectivity of the bat building / house to vegetated flight paths relies on the habitat on land on an adjacent property, and there is no information with the application to confirm that the applicant has the legal control of this land for the purposes of managing and maintaining that habitat to facilitate use of the bat house. There is therefore no guarantee that vegetated flight paths leading to the bat building / house will be appropriately sustained.
 - ii. The bat house is surrounded by housing making it completely inaccessible for monitoring or maintenance, both of which are requirements of the European Protected Species Licence;
 - iii. The bat building / house is surrounded by the rear gardens of housing, putting it at risk of inappropriate lighting from private properties (see our letter referenced CAS-74877-X4V7).
- In view of the above we cannot advise that the proposals are unlikely to result in a detrimental impact to the maintenance of the favourable conservation status of the

population(s) of lesser horseshoe bats concerned. We advise that the layout of the development is revised to ensure that:

- i. the bat building / house remains linked to the River Wye corridor via an appropriate green infrastructure corridor within the site;
- ii. the bat house remains accessible for monitoring and maintenance purposes; and
- iii. lighting from the development, either street lighting or lighting from private properties, does not compromise use of the bat house, or vegetated flight paths/green infrastructure that lead off-site from it.

We therefore require modifications to the proposed layout in line with the above advice.

Other Comments

Given the proposals are situated along the river and the presence of flood defences to the North of the site we remind the applicant of the requirement for a Flood Risk Activity Permit for any works within 16m of this area

Glamorgan Gwent Archaeological Trust (GGAT)

You will recall from our previous responses to development at this site, in our letters of 2014, in response to 2014/01290; of 2016 also in response to 2014/01290 with amended plans; and of 2018 (2018/01063) in response to the submission of the Written Scheme of Archaeological Investigation, all as your archaeological advisors.

You will also recall from these that we identified two elements of the proposed development that would require mitigation; one being the buried archaeological resource; the other the historic buildings on the site. Regarding the buildings, as we noted, these: "including a building associated with the First World War development of the site as a shipyard. The application area is significant as one of the sites chosen for the assembly of N-type ships during the First World War; demand for vessels was high following extensive loss of merchant shipping at the start of the First World War and assembly sites for prefabricated N type ships were a vital part of the nation's response to this demand." Within the recommendation section we therefore clearly stated that mitigation would be necessary in order to preserve the buildings by record: "We envisage this this will take the form of detailed building recording of surviving elements of the early shipyard and associated structures" as the building forms part of the whole complex with the extant shipyard remains.

The buildings have been demolished without record, between 2017 and 2018, contrary to our detailed advice; we had contacted your Authority with this information in 2018. The WSI we approved in June 2018 also includes a section to record these buildings; and we have not received a report on this. Given that 2018 marked the centenary of the cessation of hostilities, the loss of these First World War structures without record is a loss to the Historic Environment Record.

Regarding the buried archaeological resource, our responses recommended the submission and implementation of a written scheme of investigation to mitigate the impact of the development on the buried archaeological resource. This formed part of the document we approved in 2018. We look forward to the implementation of this and the subsequent production of the report containing the results of this work.

Welsh Water

SEWERAGE

We have reviewed the submission package for the above reserved matters application, we note the applicant has submitted plans detailing the spine drainage at this site, this details on site foul and surface water drainage, while we have previously completed a foul water hydraulic modelling assessment on the surrounding sewerage system the applicant has instructed us to complete a further assessment to address levels of detriment caused by connecting the proposed development site into the surrounding sewerage system. The second hydraulic assessment is currently on going and the extent of off-site sewer reinforcement works to overcome the levels of detriment caused by the site is currently unknown.

The proposed development site is also crossed by a number of public sewer and water assets, including a sewage pumping station and a number of strategic rising sewer mains which are operating under pressure, while we have been engaging with the applicants in regards to the locations of these assets the exact locations of the rising sewer mains are yet to be determined on site, the protection zone of the sewers either side of the centreline of the sewers will depend on the location, size and depth of the assets which will in turn will influence proposed development layout.

We object to the approval of reserved matters at this time, upon the completion of the additional foul water hydraulic modelling assessment and confirmation of the exact locations of sewers assets crossing the site we will review our current position.

Gwent Police

I have looked at the available plans for the application for a residential development at the former Fairfield Mabey site and although I do not formally object, I do have reservations over the layout.

Historically, communal parking areas have proved to be problematic and on the planning layout it is clear that there are numerous parking areas to the rear of the dwellings throughout the site. There will be little to no natural surveillance from the properties over the vehicles. It is also likely that the rear garden access will become the primary entrance for the dwellings, therefore a likelihood that garden gates will remain unlocked, therefore leaving the rear entrance and sheds vulnerable to potential break ins. I would suggest where possible, parking should be to the front of properties in view of dwellings and passers-by. If the properties will be subject to DQR, and required to achieve Secured by Design then the parking arrangements will need to be reviewed in order to have that surveillance.

MCC GI Team

Our response is based upon the approach set out in our adopted LDP policies S13 - Landscape, Green Infrastructure and the Natural Environment, Policy G11- Green Infrastructure and our recently adopted GI SPG, in support of the above policies.

GI Response

We refer to our previous pre-application comments that were sent to Barratts on the 20/12/18 – these points have not been addressed in the plans submitted and proposals will need to take account of these. We have however looked at the proposals and highlight the points listed below in addition to those made previously. We reserve the right to comment further on the overall layout and details as plans are amended and evolve to take account of: site changes, additional updates to plans and comments made here and in the pre-application comments on 20/12/18. For clarity these comments only relate to the RM 2019/00001, detailed comments in relation to conditions 6 -22 will be provided separately following submission of updated plans and information as a result of these comments and surveys and assessments being currently prepared by Barratts. We will endeavour to provide some structural comments by the end of the week based on information provided to date.

Key Issues

1. We require an overall GI masterplan to be submitted not just a Planning Layout plan this will then need to support and correspond with the detailed landscape plans; there are currently inconsistencies between plans.
2. The GI Masterplan and the landscape layout plans – should include specification information about:
 - The riverside park grassland areas.
 - Existing grassland and vegetation.
 - Clarification of vegetation east of fence and hedge.
 - Treatment of bat house enclosure (see Ecology comments below).

- Pumping stations mitigation.
- Western and southern boundaries

4 Western Boundary

Details of the western boundary and green space left over from network rail buffer and /or how those areas within the NR buffer will be dealt with in terms of; stability; management and any new planting. Stability of the cliff face to be surveyed by Barratt and possibility explored with NR to using the existing retaining wall rather than erecting an additional secondary fenceline. Whilst on site it was noted that significant areas of vegetation had been cut back removing more tree planting, exposing the railway to the south of Brunel House; clarification of this entire boundary needs to be provided.

5 Street tree planting

This should be incorporated outside of private ownership along both sides of the main spine road plots 138 – 175, along plots 261- 251, plots 136 – 160, and between plots 110 and 328, these features are important as they will help reduce density, establish character, help reduce pollution, help support safer walking routes by framing visual routes, help reduce surface water, provide shade, and support health and well-being through the creation of an attractive environment thus reflecting and addressing the new approach to place- making in PPW10. They will help create connectivity to the green corridors and riverside park in what would otherwise be a hard urban environment.

6 Insets on key areas

These have not been provided see previous pre-application comments(20/12/18) for these requirements together with amendments for these areas e.g. 1 Bombardon Square, 2 Brunel Square, 3 Main green corridor play areas, 4 Natural nautical play area, 5 Informal play area David Wilson side, 6 Green Corridor up to the network rail site , 7 Green space not clearly defined alongside plots 313-320 , 8 Interface between the proposed site and the Osborn site (A48)

7 Levels

A detailed levels plan for the whole site to be provided; it was acknowledged on site that a levels plan was being prepared, this will be essential and will have a significant impact on much of the green space proposals. It was agreed on site that opportunities for raising sections of the footpath to enable vistas across the hedge/fence would be incorporated in revised plans following completion of the levels information. These elevated sections would be explored in key locations to support views out across the site towards the Bridge as a key landmark vistas.

8 All detailed landscape plans should include a key of features and relevant plant species.

9 Planting

Detailed comments on plant species to be provided following updated information however all planting should be appropriate in terms of location (e.g. fruit trees and the highway may need to be reconsidered) and as highlighted in comments dated 20/12/18 pollinator friendly species should be incorporated particularly along the riverside parkland and green corridors.

10 Revetments

Clarification required – we would like to see what is being proposed and seek the incorporation of these area seeded with appropriate mixed species grass.

11 Southern Green Corridor

The incorporation of a green corridor at the lower end of the site has not been integrated into the scheme, (see previous pre-app comments) concern is raised over the amount of accessible green space being offered across the site as a whole. The purpose of the Southern Green Corridor in the outline application was to form part of a series of connected green corridors – whilst connectivity in this was may not be deliverable, the integration of a green corridor at this lower end of the site is important to help break up the density of the development both internally and externally. Please can Barratt clarify based upon the Landscape Use Plan submitted with the RM, the total area of developable space and the total amount of accessible green space. This was previously identified as 8.4 hectares developable space and 2.6 ha for the accessible open space - has this changed?

12 Slipways

Treatment and extent of slipways needs clarifying and reflecting accurately on plan. We are happy for the slipways below the revetments to remain exposed however above the revetments we would like to see these areas top dressed with soil and include a suitable mixed species grassland. Anthony Jellard's concerns were explained on site, however it is felt that a suitable grass mesh secured to the concrete and either filled or impregnated with soil and seed would address issues of soil stability and growth. It was noted on site that a much larger area has been cleared than was originally envisaged; this will need to be reflected on the landscape plans and the overall GI Plan in terms of how this is being dealt with.

In relation to Slipway 4 an inset is required for this area identifying the detail and materials. As discussed on site the possibility of incorporating the interpretation into the slipway way was raised – this could be in the form of visual images silhouettes of shipyard workers images of the boats and machinery as well of text reflecting and connecting with the approach taken in the town centre.

Details of the fence to the bottom of slipway 4 to be provided and if absolutely required then this should form part of the visual story from the wall perhaps incorporating silhouette figures of the shipyard workers so the fence becomes part of the interpretation rather than a visual blight. Slipways 4 also offers the opportunity to seek the incorporation of existing site materials as visual reminders of the history of the site e.g. using any existing mooring bollards as seating etc. and incorporating remaining structures as features which can include interpretation.

13 All grouped parking areas along the riverside park to have hedgerows and hedgerow trees.

14 Seating, Interpretation, Street Furniture & Lighting

Details as per pre-app comments relating to seating, interpretation street furniture and cycle stands needs to be provided. A clear palette of materials including colours should be set out for the different areas to ensure continuity, this should correspond with the identified character zones. All street furniture along the riverside park should be reflective of the location, which picks up the nautical theme particularly at slipway 4 and the play areas. Incorporation of cycle stands and lighting which is appropriate to its setting and the ecological requirements will need to be addressed. Detailed comments on condition 13 to be provided separately.

15 Pumping /Water sewage treatment

The area adjacent to the central pedestrian access to be revised to take account of additional requirements; 15m buffer to be reviewed. Location of wet well to be confirmed. Odour assessment to be carried out. Concern is raised regarding ability to carry out any meaningful planting with sewages treatment works proposed immediately beneath. Suitable mitigation will be essential. All pumping stations to have suitable mitigation fencing and planting details incorporated the current proposal have not shown any.

16 Riverside park Hedge /Fence

We confirm we are happy with the proposed riverside hedge height of 1.5m as a minimum as indicated in the GI MP, please incorporate on plan as well. At key locations the hedge will be removed to allow viewing gaps – these gaps to be confirmed in conjunction with levels plan and the fence height to be lowered at these points to 1.2m. It was agreed on site that specification for the fence would be revisited we look forward to receiving alternatives designs.

17 Boundary treatment at the most southern end of the site needs to be clearly detailed.

18 Landscape treatment under the pedestrian access point and the point to the quarry needs further clarification.

19 Proposed Wales Coastal Path

To date we have had considerable support for the route to be dedicated as part of the Wales Coastal Path from the Ramblers and from the local community in Chepstow. We have made the following points on multiple previous occasions and they have still not been addressed therefore we reiterate them. To formalise this route becoming part of the Coast Path, NRW requires that it must have a permanent public right of access. This can be achieved by either dedicating the path as a public right of way or if the path is to be maintained by a management company by entering into a Local Government Act agreement. MCC would like to see this extended northwards along the river to connect to The Back though we realise there are ownership details beyond the quarry. In achieving this we need confirmation about the triangular section of land which would allow the through connection to be made. Materials proposed for the Coastal path will need to be durable and therefore hoggins would be unsuitable; we would suggest a resin bond instead. If the authority are asked to take on the management of the coastal path we will require s106 management contribution towards this.

As stated previously four key points of access have been identified which is positive, although the deliverability of the connection with the coastal path at the quarry end needs to be clarified, Barratts were to get back to us with this information following our 2nd pre-application meeting. The 3-metre wide footpath link is acceptable as is its alignment but it should be extended in a northerly direction to meet up with the path on the Osborn's site. We can supply a plan of the Osborn's site to show the position of the footway. The site is generally permeable however much of this will be channelled through streets rather than green corridors however the riverside path is a positive contribution to this green route through. Concern however is raised about the lack of cycle access.

A footpath link is also required to the side of plot 116 linking the cul-de-sac to the main spine road.

20 It was noted a significant amount of tree work has been carried out on site – confirmation is required of further work to be undertaken.

Ecology Comments

Habitats Regulations Assessment

Work has commenced on the updated Habitats Regulations Assessment and NRW have been consulted on the scope of this. This is largely a screening exercise being undertaken to reflect changes that are proposed in this multi-stage consent. Depending on the detail of the scheme as it evolves, we do not expect to require any additional specific information from the applicant although some of the information relating to lighting strategy and GI Management Plan to be requested separately will be referred to in the screening.

Lesser horseshoe roost

We are still concerned about the isolation of the bat house and the connections between this and the vegetated railway corridor (in light of the requirement for the palisade fence) and wider green infrastructure. The applicant is advised to check the WG licence requirements relating to connections and corridors for foraging/commuting bats to and from the roost. It would be useful if we could see the detail of the licence to understand the extent of the issue. The proximity of the compensatory roost to the rear gardens of the adjacent properties (plots 63-66) is also inappropriate due to the risk for disturbance; additional measures may be needed to screen and soundproof the roost. We would not want to see mitigation secured through the demolition application process compromised by the Reserved Matters. I

acknowledge that there is a thin strip of mostly laurel adjacent to the building which would need to be enhanced, retained and maintained. Connections to this need to be enhanced and improved. The long-term management of this area will be secured via the GI Management Plan (detailed comments to follow).

Hedgehog fencing – External works plans demonstrate the locations of gaps under fences for hedgehog. Overall the access being offered is very limited. I note there are constraints to providing further dedicated access because of the layout/roads. Suggest that the area around plot 249 is looked at again to try to achieve access to this block of larger gardens. Additional access needs to be provided in the DW homes section in the south where there are more opportunities for safe movement associated with the river corridor.

Swift boxes – External works plans have been consulted to review the locations of these. Most areas seem to provide reasonable opportunities with the following exceptions:

- Sheet 2 – require additional boxes are applied/integrated to the riverbank facing plots 117, 188, 199, 126 (at least one plot)
- Sheet 4 – require additional boxes are applied/integrated to the riverbank facing plots (at least one per block of plots)
- Opportunities should be provided in the south of the site (David Wilson Homes section).

MCC Urban Design

Brunel House

The setting of Brunel House (BH) needs to be respected and emphasised.

- ☐ The square needs to be proportionate to the BH setting and visually linked. Ideally the physical connection between the building and the square needs to be accessible to all i.e. steps and ramp arrangement
- ☐ The proposed buildings to the square need to respect the quality of the BH setting, materials and elevation.
 - o New building to square to be proportionate size in relation to BH
 - o Not obstructing the BH setting i.e. aligned outside of the curtilage of the BH building
 - o No small single storey housing style abutting square or BH curtilage
 - o Natural slate roof ideally sourced from the UK
- ☐ The square also needs to be part of the linked axis to both the river frontage and the principle slip way via a principle tree lined route
- ☐ The functionality of the square needs to be addressed within the surface and boundary treatments along with feeder pillars, seats and appropriate tree planting with equal separation from the private residential surround

Slipway 4 setting and frontage

The setting for a visual frontage to the slipway and river frontage development to be denser, three floors, pitched roofs, vibrant colours with tree lined frontage.

Slipway to be a destination attraction as well as high quality interpretative space

- ☐ 'Wharf' design frontage to new to reflect setting using a more contemporary architectural style and balanced with branded build style
- Semi-private / semi-public space to frontage of properties. Delivery access and parking the rear with resident pedestrian and cycle access to frontage
- ☐ Slipway to include mural and artistic interpretative boundary fence
 - ☐ Mutual high quality streetscape link from BH to and from slipway to be contiguous
 - ☐ Low level lighting at slipway for extended use

Shared surface riverside link

The link needs to be of a high 'accessible for all quality', which also links with the 'Osborne' development to the North

- ☐ Levels between the two sites, land ownership and link alignment needs to be agreed and finalised
- ☐ Constructional details provided to ensure the proposal works , takes into account the flood bund, listed structure, alignment with highways connectivity, interface with development to the north
- ☐ Adoptable standard construction ie PCC edge, tarmac over subbase with buff (or similar) grit finish rolled into wearing course.
- ☐ Waymarked and linking with Wye valley walk
- ☐ Provision for occasional parking by visitors to the riverside frontage should be provided to ensure controlled management of external visitors to the river frontage.

5.2 Responses received after re-consultation on 17/04/19

Network Rail

We have previously provided comments on 24th January 2019, attached for convenience. Our previous consultation response is still valid, and I would request this is reflected in any conditions/advisory notes attached to the decision notice. Based on our previous comments, we have no objection to this proposal.

MCC Ecology

Based on the submission and supporting information from associated applications available, we have enough ecological information to make a lawful planning decision. Overall, the development has not delivered the high quality that we had hoped to achieve for such an ecologically sensitive location. There are many missed opportunities for maximising biodiversity through appropriate planting, etc. However, there are still many details to be worked out through other applications such as DM/2018/02091.

Revetments

The technical note provided is acknowledged and we accept the difficulty of including planting in the structures. We will seek to safeguard monitoring and restoration of the habitats within the construction areas of the revetments via planning condition (to be provided in final ecology comments). The revetment example design shown (Riverside Park Landscape Materials) illustrates gaps in the wall units which could be used by nesting birds, bats reptiles etc. which will be a positive feature. This detailed design should be secured via planning condition.

A Habitats Regulations Assessment has been undertaken to inform your planning decision. This assessment is required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017, in accordance with the EC Habitats Directive (Council Directive 92/43/EDC) before the Council as the 'Competent Authority' under the Regulations grant consent for the project. . In accordance with Welsh Government policy, the assessment is also made in relation to the sites listed under the 1971 Ramsar Convention.

NRW

European Protected Species

We welcome the revised CEMP entitled 'Construction Environmental Management Plan. Remediation Phase. Mabey Bridge, Chepstow (Issue 6)' by Barratt Homes and David Wilson Homes dated February 2019.

We acknowledge the inclusion of the following text on page 13 of the document under the title 'Bats': 'To avoid lighting of key areas of Green Infrastructure on site that are to provide vegetative flightpaths to/from the Bat roost, any works within these areas are to be strictly supervised by the EcoW'.

The above addresses our concerns stated in our previous response dated 14 March 2019 and as such we have no objection to the discharge of condition 21 of DC/2014/01290.

MCC Green Infrastructure Team

Our response is based upon the approach set out in our adopted LDP policies S13 - Landscape, Green Infrastructure and the Natural Environment, Policy GI1- Green Infrastructure and our recently adopted GI SPG, in support of the above policies.

Inconsistency in the plans and their scales.

The GI Master Plan should include mitigation for boundary treatments, Swales and the Thorney Hedge should have higher planting (600-900mm not 450-600mm)

Require more details of the Western Boundary.

Require further details of the street furniture

Require further details on Public Open Spaces

Require details of the palette of the lighting structures

Require details of the surface materials

Require insets of the details of all the play areas.

The levels plan does not correspond with levels for open space areas, riverside walk and play areas.

Require a new GI Management Plan

Riverside park – there should be more extensive areas of flower rich grassland areas including planting for pollinators.

Would like to see a different palette of planting for the different character areas rather than the same planting throughout the site.

The Trees need to be full canopy– avoid all columnar and fastigate varieties

In play areas - incorporating more shade bearing trees in place of birch.

Replace Quercus Robur fastigiata koster – with full canopy Oak or lime.

E-W corridor needs to include more architectural specimens to provide a meaningful bat corridor in the long term.

None of the mitigation planting for immediately adjacent to the bat house has been specified on the landscape plan (except the laurel corridor this should be replaced with native hedge planting) . This needs to be included before approval to ensure implementation

The revetment example design shown (Riverside Park Landscape Materials) illustrates gaps in the wall units which could be used by nesting birds, bats reptiles etc. which will be a positive feature. This detailed design should be secured via planning condition.

Landscape treatment under the pedestrian access point and the point to the quarry needs further clarification. This should be shown on the landscape plans not conditioned

Require more details on the riverside path

Require a greater number of footpath links within the site.

Additional Hedgehog mitigation and Swift enhancements are welcomed

Require surface water drainage details.

MCC Highways

No objection to the overall design layout and car parking provision.

The layout is generally acceptable and accords with current design principles; however, a number of issues highlighted in previous comments prepared and made available in January 2019, have not be considered to the satisfaction of the highway authority and a number of additional issues have been identified that require resolving; require more details of the horizontal and vertical alignment to link into Osborn's and considers that the layout of Bombardon Square will lead to residents and non-residents using the square to park to gain access to the riverside park and other recreational facilities

The number of properties with a shortfall in parking provision is 172 3-bed properties that have had the number of spaces reduced by 1 to 2 number parking spaces.

The shortfall in parking provision against the Council's Parking Standards is considered appropriate as the those properties affected will have the benefit of 2 parking spaces, the

site is being developed in what is considered a reasonably sustainable location with reasonable walking and cycling distance to local amenities and public transport, bus and rail

There are a large number of private drives being proposed that serve more than five dwellings; this may lead to problems with refuse collection once the dwellings are occupied.

There are some other issues identified relating to the adoption of the road but these are not considered critical at this stage but can be considered during the finalisation of the section 38 Highways adoption Agreement: These include where the footpath in the E-W corridor crosses the road and where pavements are inconsistent.

Dwr Cymru-Welsh Water

No objection

The addendum to the initial foul hydraulic modelling assessment has now been completed, this has demonstrated that detriment will be caused by the development site; we have designed an engineering scheme that will overcome the levels of detriment caused. The developer is going to progress with the engineering solution.

In our previous response, we also referenced a number of sewerage and water assets that are crossing the development site, including a sewerage pumping station and a number of rising sewer mains. The applicant has instructed us to complete a sewer trace on all sewer assets crossing the development site; we are currently arranging this and will inform the applicant of the results. If the assets protection zones extend into areas whereby operational development is proposed, the applicant will have to amend development design or alternatively look to divert assets under Section 185 of the Water Industry Act 1991.

Therefore, we have no objection to the approval of reserved matters attached to the above planning application.

5.3 Neighbour Notification

Letters of objection from 130 properties.

Inadequate access

Increase in traffic

Increase of pollution

Noise nuisance

Strain on existing community facilities

Putting more and more housing in everywhere is not the right way to grow a cohesive effective community

Over-development

Can it not be phased so all infrastructure and community issues be tackled and solutions found

Schools and Doctors Surgeries are at capacity

Impact on Residential Amenity

Chepstow is already choked with traffic and the Station Road area is particularly bad at all times of the day. Pollution levels would increase markedly from the extra traffic associated with this project both during the build phase and afterwards

Inadequate Public Transport Provision

The town is already at a point that it cannot cope with the increased population. Permanent traffic jams at peak times and even on the weekend there are traffic jams gaining entry to Chepstow from Lydney on the A48.

Development is too high

More open space needed on development

Potentially contaminated land

The space would get better use brining new businesses to bring some life back into the town centre area and better serve the town in general and the future

Unless a sustainable solution to vehicle traffic and air pollution can be found there should be no further expansion to the town of Chepstow

Affect local ecology

Out of keeping with the character of the area

Inadequate parking provision

Loss of parking

No logistical support measures put in place to support local traffic routes local schools, local doctors, and public transport.

The development of new houses is a good thing but all the local infrastructure needs to be more substantial to support the amount of new people who will inhabit the houses

Bulwark corner was recently listed as the seventh most polluted area in the UK, exceeding WHO limits, this development will significantly worsen this.

MCC do not seem to want to reconsider this decision in light of this changing legal landscape regarding responsibility for traffic pollution

I have also been told by a councillor, before the original decision was passed, that if we build first this would emphasise the need for the by-pass; this does not seem to be an acceptable way to continue

How does this proposal line up with the Current Air quality issues in Chepstow, and the current level of traffic flowing through the Town.

With 901 parking spaces provided in these plans, there is no plan to relieve the current situation with regards to traffic through Chepstow up Hardwick Hill

How many of these houses will actually be affordable for first time buyers?

Pushing up house prices

Before any more housing developments are allowed in Chepstow more primary and secondary schools need to be built.

A link road linking Thornwell Chepstow and back on further up on to the A48 Gloucestershire side needs to be built. Better, reliable and affordable public transport is needed to lower the traffic and pollution from people's commutes to surrounding cities.

Adverse impact on Tourism

It would appear that all of the community benefits proposed originally have been removed which can only suggest that this is a money making process alone with no care or conscience for the area, it will just destroy what is a lovely town.

In the recent high profile High Court decision relating to pollution as a cause of death, one of the grounds for calling a fresh inquest (and leave to apply was granted) was that permitting illegal levels of air pollution was a potential breach of human rights under Article 2 of the European Convention on Human Rights. This MUST be something that the council needs to consider. Whilst the need for more housing is recognised, this cannot be at the expense of the health and wellbeing of existing residents.

Not affordable housing, this should be social housing. Developers should be made to contribute local infrastructure, roads, schools, parks, public transport.

It will cause some significant disruption during the build.

I believe the character of our town is changing with all the development going on and object to the scale of this proposal.

I object to more 4 bedroom houses being built. Why are they being built when the size of households are becoming smaller.

Following the closure of the Bridge and the building of new houses over the river in Gloucestershire (Tutshill and Lydney) traffic flow is already not being accommodated. There are significant periods of queueing Mon-Fri at peak times and the High Beech Roundabout has already reached its limits.

This development will not support Chepstow as a key settlement, but simply add more housing, thereby increasing the problems of traffic congestion, air pollution (which is already at unacceptable, illegal levels) and strain on the existing amenities, the proposal contravenes the Council's clearly stipulated parameters as per the LDP.

The whole feel of the 'town' and 'community' is changing - we are becoming a city without further investment. The worst part is, these houses are not selling.

The developers should be forced to contribute to a bypass and local infrastructure not just public spaces that residents should automatically be entitled to anyway.

I appreciate we need housing especially affordable however I do not think these will be guaranteed. I understand the law allows for developers to pull affordable houses if they can prove they will make a loss on them and developers take advantage of this.

Why cannot all developers be forced to put solar panels and environmentally sustainable energy measures on all new builds therefore helping to contribute to the grid rather than take from it?

Light Pollution concerned that poorly shaded street lighting / external lighting will impact on my property. The site currently operations a spotlight all night which is a nuisance due to its alignment.

Construction Noise Nuisance

It is a shame that the sand wharf is not being restored as a good quality local resource. With a history of vessels such as the Balmoral using the site, it would be a great opportunity for the town's tourism to provide this resource.

Although the site needs to be developed to provide additional housing and make use of a brown field sites I have a number of concerns.

The A48 is already substantially congested throughout the day and weekends. The addition of these properties without adequate road / transport alternatives can only increase traffic problems

During periods of high demand it is difficult to safely exit the Tesco site. With increased traffic passing the site I foresee substantial impacts on the site and traffic. It is already difficult leaving the Tesco site to join in the queue of traffic onto the A48. This can only make it worse.

Dust from the site during construction is a concern, especially due to the fine nature of the river mud on the flood plain. PM2.5 and PM10 is a substantial health risk to neighbours.

Loss of Privacy, the site overlooks the end of my garden (which is at river level).

The plans make no provision for the inclusion of the proposed Wye Cycle and Pedestrian Bridge. The Welsh Assembly government prioritises healthy activity and the promotion of cycling and walking. This exclusion risks the development preventing the bridge being installed at a later date without a proper area set aside for the end on the site.

Intended upgrades to the railway station (including disabled access) are not planned until 2025. Therefore any wheelchair users will be excluded from access to the rail network.

This development, while perhaps satisfying its individual planning conditions, when combined with all the other ongoing and potential developments in Chepstow, the Caldicot area and Lydney, will significantly contribute to the current high levels of stress on local amenities and infrastructure.

These plans should not be changed from those already approved. The public spaces and pathways are essential

Where is the foot/cycle path bridge from Sedbury which was on the original plans?

Why is the coastal walk now to be made out of wood chippings which are totally unsuitable for disabled people?

Where is the parking for the railway station and access from this side to enable disabled people to get onto a train at Chepstow heading to Wales.

Where is the variety of housing proposed. These are just bog standard houses. This is a heritage site, and the designs should reflect this

The reduction in mix of housing is also of concern. How would this enhance Chepstow? The town thrives on the assortment of architecture from a touristic and general interest perspective.

Since getting planning permission Barratts have removed key community initiatives within the development such as green spaces for resident enjoyment, bike paths to join up with Severnside Quay and the mix of housing design has been reduced.

Impact on the Human Rights of the local residents

Houses will not be available for local residents but will go to outsiders.

Low proportion of affordable housing

Proposed community park (under the bridge) has now been removed completely. Where are children meant to play?

A new home for the Severn Princess - removed from original plans - this is an important part of Chepstow history.

Quarry will no longer be utilised as a community/environmental space

Maybe we need to be investing in a tram system to Bristol or a relief road that crosses the river

The Active Travel (Wales) Act: I would question how the design contributes towards the Welsh Government's aim to increase levels of walking and cycling

Letters of objection received from 12 properties following re-consultation of 17/04/19

No matter how this application is amended, it is fundamentally flawed simply because all the traffic that it creates is funnelled onto or across the A48 right in the centre of Chepstow.

There must also be doubt whether the type and size of the majority of the projected properties actually helps those local people who are anxious to own their own 'starter' accommodation.

Increased traffic congestion.

Nothing has changed since last objecting. The traffic situation is unacceptable. No extra schools and doctors. No local hospital with increase population. Access to site. I therefore object to this development being passed too. Maybe MCC should look at accommodation for the elderly as nothing has changed in Chepstow for 30 years.

Access onto Church Street will lead to traffic congestion in Lower Chepstow

Object to planned use of Hardwick Avenue to be used as a means of access and egress to heavy plant vehicles for the development of 345 Houses

Mon CC are only looking for more council tax.

Pollution on Hardwick Hill.

Insufficient Facilities in Chepstow

Will price out local residents, people from Cardiff and Bristol will move in.

No need for so many 4 bed houses

MCC not listening to the public.

Chepstow is over developed.

Chepstow requires a by-pass.

Letters of support from two properties

This seems to be a generally well-thought-through proposal. I would, however, direct your attention to the comments made by A-B Connecting Communities in their comment in support of the proposal, which I endorse

I support new affordable housing in the area but feel the developers should be made to adhere to their original plans and include open spaces and community contributions

5.4 Other Representations

Chepstow Society

How will air quality be brought under control?

The new development should be integrated into the town

Present traffic problems should not increase

Need effective protection against flood risk

Believe that the flood protection measures should extend down stream

How will this solve existing traffic congestion?

Inadequate vehicular access into the site

Traffic will use Garden City

Development is on a Brown Field Site

The layout seems acceptable
Needs to have regard to pollution from lead paint
Should consider solar panels and rain water harvesting
Runoff into the river must be controlled
Needs suitable infrastructure, schools doctors, footpaths, parking and planting.

A2B Connecting Communities

There are several considerations to put to Barratt Homes before this development takes place:

1. Discussions with Andrew Leitch Project Manager of the Mabey site and Alan Hayward 4th May 2015 and the meeting with MCC members and others; Mark Hand; John Nicholas; Sue Kingdom; Nicola Edwards, Christian Schmidt, Mark Davies, at the Chepstow Tourist Information Centre on November 22nd 2017 outlined and reinforced proposals from A-B Connecting Communities.
2. A six stage proposal was drawn up with MCC to action a continuous safe and sustainable route for non-motorised transport connecting the Severn Bridge with the Wye and Severn Valleys and the Forest of Dean.

1st Severn Bridge to NS1 site
2nd along NS1 site 3 Bridge
3rd Link Bridge
4 Bridge to start of Railway line
5 Disused Railway Line to Tidenham Tunnel
6 Tidenham Tunnel to Tintern and new Truss Bridge

3. The NDAC with Greenways are planning to submit a planning application to FoDDC at the end of January to restore the disused railway line running from the A48 to Tintern via the Tidenham Tunnel and further revisions will include the sections to connect with Wye Dean School and the Wye Link Bridge.
4. A-B Propose adding the location of the new Wye Link Bridge to the Plans for the Mabey development, in readiness for future direct funding. The cost of the bridge and upgrading the Wales Coastal Path at approximately £3 million is far lower than the cost of the proposed Chepstow bypass at £100 million. The Bridge design should be sufficiently strong to enable access for Emergency vehicles to serve the new development and Chepstow from Gloucestershire and vice versa.

This safe sustainable route with the Wye Link Bridge including the landscaping of the Riverside Park can be built well in advance of the housing. Its use by families and businesses could be well established before the extra strain on the road infrastructure of the new developments in Chepstow and surrounding areas makes itself apparent.

5. A-B also propose a new ecologically built Activity Centre as part of the development to service the proposed Shared Use Path and provide learning facilities for local school children and community groups to include:
Cycle Hire
Accessibility for Disabled users of the Route
Peregrine Viewing Hides and Falconry lessons
Cycle repair shop
Café
Art Gallery
Public space for workshops
Archaeological, Industrial, historical, ecological and conservation displays

Since its inception in 2014 A-B Connecting Communities have raised more than £20,000 in funding independently as a not for profit organisation.

6.0 EVALUATION

6.1 Strategic & Spatial Choices

6.1.1 This former industrial site at Fairfield Mabey site was allocated within the LDP as a strategic housing site, following a Public Examination of the LDP. The development of this site for a mixed use development accords with national policy of developing brownfield sites as a priority and therefore accords with stated objective of paragraph 3.51 of PPW10 of using previously developed land. The site is located within Chepstow, one of the four main towns in Monmouthshire and as such it occupies a sustainable location within easy walking distance of the town centre, public transport hubs and other local facilities.

Principle of the proposed development

6.1.2 The Fairfield Mabey Site in Chepstow is identified as a Strategic Development Site under Policy SAH3 of the adopted Local Development Plan. In November 2017 outline planning permission (DC/2014/01290) was granted for redevelopment of the site to create a new neighbourhood for up to 600 dwellings. Therefore the principle of developing this site for mixed use is already clearly established. The access into the site was considered as part of the outline proposal. The principle of housing development on this site is already established and the current application seeks approval of the layout, design, appearance and landscaping of the site. The position of the access into the site is already approved. The outline permission required that 1.5 acres of land be provided for affordable housing. The area of land for affordable housing has been identified on the plan and conforms to the outline approval but will be the subject of a separate application. Similarly the development of the employment land and the conversion of Brunel House will be the subject of separate applications.

Good Design/ Place making

6.1.3 Layout

6.1.3.1 The main entrance into the site is from Station Road and down Mill Lane under the railway bridge which is a Grade II Listed Structure. It is a requirement of the outline approval that the roadway under the railway bridge will be lowered by approximately 1 metre to allow for traffic to flow in two directions and to provide for a footway beside the road. You will then enter the site adjacent to Brunel House which is also a Grade II Listed Building. In front of Brunel House will be a square measuring approximately 1,100 sq. m. The public square will enhance the setting of Brunel House and can be used for community activities and for informal recreation. The square will be surrounded by three storey dwellings that will assist in framing the Listed Building and enhancing its setting. The setting of Brunel House would be protected and it would appear as the dominant part of this square and the primary building in the public space. The formal square and its associated planting and hard landscaping would be appropriate for the setting of the listed building. PPW Ed. 10 section 6.1.10 clearly outlines that the primary material consideration is the statutory requirements to have special regard to the desirability of preserving the building and its setting and this scheme would ensure that Brunel House's setting is protected in the long term.

6.1.3.2 From Brunel Square the main access through the site will divide into two main tree lined Avenues with views to the river. The first will extend down to Bombardon Square and the other will extend down to Slipway 4. These two main avenues will have a predominance

of 2.5 and 3-storey dwellings. These roads would be key primary routes in the development and have outward views to the riverside.

6.1.3.3 The site has been divided into three distinct character areas in accordance with the requirements of the outline planning application. With 'New Chepstow' at the northern part of the site including Brunel Square and Bombardon Square. The 'Steelyard' is in the central part of the site including Slipway 4. These first two areas would be developed by Barratt Homes. The third character area would be to the south of the site towards the quarry; this would be referred to as 'Hardwick Cliffs' and would be developed by David Wilson Homes. The three areas would have distinctive design characteristics with New Chepstow and Steel Yard being more industrial in appearance with a predominance of three storey wharfside building styles including gables facing towards the road. Hardwick Cliffs would be more domestic in character, with a predominance of two storey detached properties to reflect the character of dwellings in the adjacent Garden City. There would be a common palette of materials throughout the site but there would be a graduation of material with greater use of brick in the northern parts and more render and clad-boardings towards the south of the site.

6.1.3.4 Between the housing development and the riverbank would be a riverside park which would include opportunities for informal play, a nautical themed area of play and a community orchard. In addition, the park would contain a three-metre wide multi-use cycle/footpath which would link into the footpath on the adjoining Osborn's development, under the bridges to the north and into the steps adjacent the quarry in the south. This footpath would therefore provide a footpath link from the Town Centre to Thornwell. It is hoped that this path will eventually form part of the Wales Coastal Path. The riverside park will also include opportunities for informal play and a community orchard. Between the riverside park and the riverbank there would be a 1.2m high fence with thicket planting in front. This is required for ecological reasons to protect the habitat of the River Wye and is also needed for Health and Safety reasons. However, viewing gaps would be provided in the thicket to allow users of the path to gain views of the river as they move along the riverside park.

6.1.3.5 The slipways in the central part of the site are of National Historical Importance. It is a requirement that these slipways are preserved in situ. Slipway no.4 will be restored and form part of the public realm for recreational purposes. The area will be resurfaced, interpretation material will be provided and the sides of the slipway will be repaired. Railings will be provided at the top of the side wall in front of the houses and also across the centre of the slipway above the high tide mark. The development promotes good design with a strong sense of place. The development will enhance quality of life for the residents and will add to local distinctiveness. PPW10 par. 3.9 outlines that the special characteristic of an area should be central to the design of a development. The layout has been designed to ensure that the key historical features of the site such as Brunel House and the slipways are focal points and the layout emphasises these areas. There is a clear rationale behind the layout and it is considered that good design principles have informed the layout in accordance with the requirements of section 3 of PPW10.

6.1.4 Design

6.1.4.1 Officers and Members have worked with the developers to produce a design that reflects this unique development opportunity. It is important that the proposal should reflect the site's distinctive industrial past. The overall design of the development provides a bespoke residential development and it is considered that it delivers on providing a place in which people will want to live. This is the largest single residential development in the County and as such it is important that its design and details respect the distinctive location. At the entrance to the site is Brunel Square that contributes to the setting of the Listed Brunel House. The buildings around the square will be three storey with gable roofs. The

design of the buildings around Brunel Square have an industrial (warehouse) character and contrast with the hipped roof of Brunel House to ensure that the Listed building is the dominant part of the square. The setting of the listed building would be protected and the scale, mass and design of the dwellings in the square ensure that this public realm is distinctive. The dwellings around Brunel House would be constructed with a natural slate roof to ensure the buildings are sympathetic to the Listed Building.

6.1.4.2 There will be two main avenues through the site. These will have landmark three-storey buildings at key focal points. On corner plots the dwellings will be dual aspect to ensure an active frontage is maintained in the street scene. In the Steelyard part of the site, there will be a large number of three-storey terraced properties with gabled roofs and a contemporary design. The two main avenues will have a varied roof height that provides a distinctive street scene that it is not uniform in appearance. Along the western part of the site there will be rows of terraced properties facing towards the river that would be viewed from the footpath and the public open space areas. The design of the dwellings along the main primary routes (i.e. the two avenues and the waterfront) have been carefully considered and do provide a sense of place. The row of nine terraced properties above slipway 4 are visually prominent especially as they will be in a raised position and be clearly visible when viewed from the riverside path when travelling in a southerly direction. These buildings will also create a sense of place around the public open space on the redeveloped slipway 4 and have a nautical appearance to represent the waterfront location. These prominent dwellings will be three storey with a strong vertical emphasis to reflect the setting of the slipways and create a landmark within the development.

6.1.4.3 The dwellings to the south of the site within the Hardwick Cliffs area would have a lower density and would provide a character of area that differs from the rest of the development. The alterations in the character and design of the site ensure that the site is not homogenous and its character and appearance changes when moving around the site. The layout and design of the buildings enable a scheme that is of a good standard of design that is in accordance with PPW to create sustainable and distinctive places in which people will want to live.

6.1.5 *House Types*

6.1.5.1 Of the 345 residential dwellings, the majority of them (244) will be three-bedroom dwellings, 22 of the units will be two-bedroom and the remaining 79 units will be four-bedroom dwellings. A booklet of house types has been produced and forms part of this application. It shows 28 basic house types with various finishing details and orientation. The house types are two, two and a half and three-storeys high with 25% of the properties being over two-storeys. The three-storey units are located within the main visual points in the northern part of the site while the more traditional two-storey dwellings are located predominantly in the Hardwick Cliffs area in the southern part of the site. FOG's are also being proposed, these are flats over garages which help to alleviate the parking pressure on the site. There is a wide range of house types including some of design that is more contemporary. The two-storey detached dwellings, which are more conventional for suburban developments, are mostly concentrated in the southern part of the site. All of the units have overhanging eaves and window reveals. Some of the windows protrude out from the elevation of the property in a more contemporary manner. Officers have been in detailed discussion with the house builders regarding the house types and those house types not considered appropriate for this scheme have been omitted. The layout and design of the whole of the site has been very carefully considered in order to provide a sense of place that reflects the site's unique historical past. The development therefore accords with the objectives of PPW10 and Policy DES1 of the LDP.

6.1.6 *Finishing Materials*

6.1.6.1 The choice of finishing materials has been developed to reflect the site's industrial heritage and to promote a sense of place. There will be a predominance of brick, particularly in the northern part of the site. A single brick type would be used throughout the site and a sample of this is available for Members to view. There will be render detailing on many of the properties and only four colours of render will be used throughout the site to give a sense of cohesion and all these colours are fairly muted. These would be "earth", "light blue", "stone grey" and "white". For the same reason just two types of composite timber cladding will be used: "blue grey" and "grey green." Limiting the range of finishing materials in this way but grading them though the site maintains the three distinct character areas while also allowing for an element of consistency throughout the site. The dwellings around Brunel Square will all have natural slate roofs so there will be a visual link between them and the dominating Listed Brunel House. All the other properties and the garages will have a mini Stonewold roof tile. Again, limiting the range of materials in this way will create a unique identity to the site, helping to create a sense of place. All the fascia, window surrounds and rainwater goods throughout the site will be of grey uPVC. The garage doors and other details such as the metre boxes will be of grey painted steel/ uPVC

6.1.7 Boundary Treatments

6.1.7.1 The screen walls within the residential curtilages will be of brick to match the brick on the houses themselves. Timber fences, 1.8m high, will also be used throughout the site to define plot boundaries. Along the western boundary of the site to the north, adjacent to the wharf and above the wall at slipway 4 and across the middle of slipway 4 there would be a 1.2m high estate rail. This will allow for visual permeability and is in keeping with the waterfront character of the area. This type of railing has been successfully used in other riverside locations throughout South Wales. Elsewhere along the river bank would be a 1.2m high timber post and rail fence with protective mesh; the thicket fence would be planted on the eastern side of this. This is needed for health and safety reasons and also to protect the ecology along the river bank. There will however be several gaps in strategic locations to allow for views down the river and out of the site. There will be a 1.2m high weldmesh fence located in these gaps to prevent the public falling into the riverbank. This solution provides a compromise between ecology interests and the provision of vistas out of the site in important locations. There will be revetments of stone approximately 2.3m high situated in various locations along the western boundary, this is to retain the land and prevent flooding. There is a need for a fence along the western boundary of the site where it abuts Network Rail land; the specification for this will be determined by Network Rail and is likely to be a palisade fence but the details are not yet available so this will need to be the subject of a condition. In general the boundary treatments throughout the site have been carefully considered and will be in keeping with the character of the riverside location while retaining protection for the very sensitive ecological features and for health and safety protection for the public.

6.1.8 Impact on Amenity/ Promoting Healthier Places

Sustainable Location

6.1.8.1 The location of the site itself promotes healthier living. The site is located in a very sustainable location within easy walking distance to the town centre and its many facilities. There would be less dependence on the car with the new residents being able to walk to the shops, schools and other community facilities. In addition, the site is adjacent to Chepstow Train Station and close to Chepstow bus station. The location of this development encourages walking and cycling which results in a healthier lifestyle in accordance with the active travel aspirations within PPW10.

Public Open Spaces

6.1.8.2 The Proposed Development includes 2.7ha of accessible green infrastructure. This includes:

- Two west/ east green corridors, with the northern corridor including areas for informal play;
- The creation of a riverside park which includes a community orchard, areas for informal play, and a nautical themed play area;
- A riverside path, which connects to the Osborn's development to the north and the footpath, steps adjacent to the quarry at the south.
- Three key areas of public open space, these being Brunel Square, Bombardon Square and Shipyard Plaza/Slipway 4

6.1.8.3 These public open spaces will encourage residents to enjoy outdoor activities and this will be for the benefit off all Chepstow residents not just those living in this development. There will be opportunity for walking and cycling along the riverside path as well as formal play in the nautical themed play area and more informal activities along the trim trail and green corridors. The three public open spaces will be destinations for the public to walk and cycle to. The design of the development encourages outdoor activity in the fresh air and this conforms to Welsh Government's objectives of healthier living. The orchard can promote a sense of community and active living. The recreational provision will be considered in more detail later in the report.

Impact on existing residential areas.

6.1.8.4 Owing to the location of the site with the River Wye to the east and the railway line, embankment and cliffs to the west there is very little amenity impact on existing residential communities. The properties most affected by the proposal are those in Wye Bank Road in Sedbury. The occupiers of all those dwellings have been notified of this reserved matters application and site notices have been posted in those areas. Although those properties are on the opposite side of the river they will be able to see into the site. Given the distances involved though there will be no significant overlooking or loss of outlook. Those properties may be slightly affected by dust and noise during the construction phases but the impacts of these will be mitigated by the provisions made in the CEMP and this will be controlled by condition. The residential properties in Thornwell and Bulwark are set at a much higher level and will not be impacted by the proposal. There are several properties at the end of Severn Crescent that are close to the proposed development but they are set at a much higher level and are separated from the site by the railway line. The properties in Garden City are separated from the proposed development by the railway embankment although there would be a pedestrian link under the railway line linking the proposed site with the playing fields on Hardwick Avenue. The properties on School Hill may be potentially affected by the proposal due to the increase in traffic using Station Road. However, the impact of this has been looked at in detail as part of the Transport Assessment that supported the outline application and found to be acceptable. The proposed development would not have an adverse impact on the residential amenity of any other party and would be in accordance with Policy EP1 of the LDP.

6.1.9 Sustainable Management of Natural Resources

6.1.9.1 A primary objective of PPW10 is to maintain and enhance the resilience of ecosystems and the benefits they provide. Whilst the ecological value of the site is limited, the site is ecologically sensitive due to its proximity to the adjacent River Wye that has been designated as Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and a RAMSAR site. This sensitivity was considered in depth at the outline stage that

confirmed the appropriate development footprint for the site. The reserved matters application reflects this development footprint. In addition, the development of the site includes 2.7 ha of accessible open space along with 345 residential gardens. In addition to this, one of the buildings that previously occupied this site contained a bat roost. To comply with a condition of the outline approval a new bat house has been located on the site close to the car park of Brunel House. It is important that a dark, green corridor is maintained along the northern boundary of the site between the river and the bat house. The layout of the housing development has been amended at the request of NRW to reflect this and NRW now have no objections to the development provided that the provisions of the Construction Environmental Management Plan are complied with.

6.2 Active and Social Places

6.2.1 Sustainable Transport Hierarchy

6.2.1.1 As stated above, this site is in a highly sustainable location. The Sustainable Transport Hierarchy for Planning outlined in PPW10 states that in relation to new development, walking, cycling and public transport are prioritised ahead of the use of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services. In this case, walking and cycling are being promoted. From the site, links have been put in place so that the residents can walk to the town centre via Station Road and the underpass under the A48 and can also walk to Lower Chepstow via the Osborn's Development to Lower Church Street. Residents will be able to walk to the adjacent Railway station for trains to Gloucester and Severn Tunnel junction from where they can access trains to Bristol, Newport and Cardiff. The site is also within walking distance of Chepstow Bus Station and other facilities in the town centre. The sustainability of the site was discussed in great detail via the "Green Travel Plan" at the outline stage. This site complies with the objectives of the Sustainable Transport Hierarchy.

6.2.2 Access / Highway Safety

Access into the site

6.2.2.1 The access into this site, including the junction of A48 and Station Road and the junctions of Station Road and Mill Lane were considered in detail and approved as part of the outline application. As the A48 is a trunk road, Welsh Government Transport Division were instrumental in the consideration of the access into the site. It was determined that the junction of A48 Station Road was sufficient to serve a new development of up to 449 dwellings without the need for modification. This development is well under that trigger point. Geometric improvements to increase junction capacity and improvements to the pedestrian realm including the underpass would be required after the first 100 dwellings were constructed. It is also part of the outline application that the junction between Mill Lane and Station road be modified and that Mill Lane be lowered under the railway bridge to provide for a wider, useable carriageway. All these issues relating to the access into the site have already been approved as part of the outline application.

6.2.2.2 Policy MV1 of the LDP requires that all applications that are likely to have a significant impact on trip generation and travel demands must be accompanied by a Transport Assessment (TA). A TA was submitted as part of the outline application and was carefully considered by Welsh Government Transport Division and MCC Highway Engineers. A development of up to 600 dwellings was considered acceptable whilst the reserved matters application is only for 345 units.

Internal Layout

6.2.2.3 The internal layout of the development does form part of the Reserved Matters submission and needs to be considered in detail at this stage. The main access into the site is from Station Road under the railway bridge. The primary route will then divide into two with one road leading to Bombardon Square and the other turning south and going to Slipway 4. This main route will be a tree-lined avenue. There will then be three secondary routes, one linking into the Osborn's development to the north, one going towards the quarry in the south and one in the centre of the site following the riverbank. Off these will be a series of cul-de-sacs, parking courts and private driveways. MCC Highway Engineers consider that the layout is acceptable and accords with current design principles. Furthermore, the proposed road hierarchy conforms to the parameters set out at the outline stage.

6.2.2.4 The Highway Engineers have identified some detailed issues such as the need for a safe crossing of the road by the footpath on the NE green corridor but this can be required by condition. Also identified are detailed issues to the potentially adoptable layout but these do not directly influence the planning decision and can be resolved at adoption layout approval stage. The Highway Engineer has no objection to the overall design, layout and car parking provision of the development. An adoption plan has been submitted as part of the application which indicated where the private drives will be; it must be noted that these will not be adopted and that there will be no access to these for refuse vehicles. MCC Highways have identified that there may be an issue with residents and non-residents parking cars on Bombardon Square, however planning officers do not consider this to be a serious hazard sufficient to warrant a reconfiguration of the road layout.

Parking

6.2.2.5 The adopted Monmouthshire Parking Standard require that there should be one off street parking space provided per bedroom up to a maximum of three spaces. Therefore the total number of parking spaces required for this development is 1013. The layout shows a total of 847 being provided throughout the development. Most of these spaces are being provided on driveways or parking courts although there are some detached garages being provided especially towards the southern part of the site. There is shortfall of 166 spaces throughout the site. The entire shortfall relates to the proposed three-bedroom dwellings which would have two spaces instead of the required three. It has been agreed that the shortfall is acceptable given that Mabey Bridge occupies a sustainable location being within walking distance of the town centre and public transport. There is a supermarket and train station within 250 metres walking distance of the site. There is a bus station within half a mile. Given the sustainable location it is considered that there can be some relaxation of the parking standards. It is more acceptable that the shortfall be among the three-bedroom dwellings as these are the ones most likely to have two cars (or fewer). All visitor parking will be provided informally on street. The shortfall in parking provision against the Council's Parking Standards is considered appropriate as the those properties affected will have the benefit of two parking spaces, the site is being developed in what is considered a sustainable location with reasonable walking and cycling distance to local amenities and public transport, bus and rail

6.2.2.6 Gwent Police have concerns over the number of rear parking courts as this will result in lack of surveillance of parked cars and will also leave the rear of properties vulnerable to theft. While it is agreed that rear-parking courts are less than ideal, it would compromise the design of the layout if each dwelling had to have driveways to the front. The parking courts are also generally well overlooked by the adjoining houses so surveillance is sufficiently available in these locations. Consequently, planning officers have no objection to the level and arrangement of the parking proposed.

6.2.2.7 Given the sustainable location of this development and the objectives of PPW10 to support a modal shift towards walking, cycling and public transport it is considered that the shortfall in parking provision is acceptable. Policy MV1 of the LDP states that where appropriate, new developments should satisfy the adopted parking guidelines, but for the reasons stated above, a degree of flexibility can be allowed in this case.

Footpath links

6.2.2.8 The Sustainable Transport Hierarchy in PPW10 promotes walking and cycling first saying that LPA's must ensure that new developments are highly accessible by walking and cycling (para 4.1.31) and that a development proposal, through good design and supporting infrastructure, should prioritise provision for access and movement by walking and cycling to maximise their contribution to the objectives of the Active Travel Act. In this case a multi-use 3m wide coastal path is being provided on the eastern side of the site and a long length of footpath is provided along part of the western side. In addition, there are several footpath links throughout the site including one through the northern corridor. There is permeability throughout the site and from the site to locations outside. The riverside footpath links into Lower Chepstow to the north and Bulwark to the south via the steps adjacent to the quarry. There is also an important link from the centre of the site under the railway to Garden City. These footpaths encourage active travel and also provide green corridors for wildlife and green infrastructure. Policy MV2 of the LDP supports Sustainable Transport Access stating that new developments should link into existing rights of way, walking, cycling and green infrastructure networks. The proposal accords with this policy.

Coastal Path

6.2.2.9 During the course of the application and following pressure from officers and local residents, details of the 'Riverside Path' have been amended. The path will now link up with the Riverside Walkway on the adjacent Osborn's site. The path will be 3m wide for its entire length and will be finished in a bonded resin material with concrete edging. This is a hard surface and thus the path can have a multi-use function. The path will run through an area of green space between the development and the river. At strategic points along the path the adjacent thicket will be lowered to provide views out of the site towards the river. It is intended that the path will link into the Wales Coastal Path in Bulwark at the southern end of the site via the existing steps adjacent to Beaufort Quarry. This cannot be finalised at this stage because there is a small strip of land the ownership of which cannot be identified. The developers are looking into this issue further. There is an option that in the future the riverside footpath running through the site will be adopted as part of the Wales Coastal Path. The Severn Princess will remain in situ where it is now under Brunel Bridge hopefully to be restored to its former glory by a charitable restoration group. The riverside park will run close to the site of the Princess and therefore afford views of it. To move it to a more central part of the site may cause damage to the structure. An area of land at the eastern extent of the main Avenue has been identified as a potential landing area for the cycle path over the river Wye, this is only indicative at this stage. It is not the applicant's responsibility to provide the bridge. Once final details of the cycle bridge have been commissioned the exact location will be known and provision can be made for it within the site.

6.2.3 Retail & Commercial Centres

6.2.3.1 There are no retail faculties proposed for this site. The outline application approved 1.3 acres of serviced employment land. This plan honours that by proposing land which could accommodate 6500 sq. m of commercial office development on the northern part of the site. This is likely to be in the form of several four-storey office blocks. The details of this part of the development will be the subject of a separate planning application. The current

scheme does indicate however how this amount of employment floor space, car parking and green spaces could be accommodated on the site.

6.2.4 Community Facilities

6.2.4.1 Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places. In this case, a development of 345 dwellings is not of sufficient size to support major community facilities such as a community centre or place of worship. This development however is proposing a community orchard, three public open spaces and several play areas, and these will help to provide focal points for the community and also will help to contribute to a sense of place.

6.2.5 Recreational Spaces

6.2.5.1 It is proposed that there be a large public square in front of Brunel House at the entrance to the site. This will be hard surfaced with tree planting around the edge. There would be a set of large rounded steps at the edge of square offering opportunity for informal seating. The design of these steps are based on those currently provided in Beaufort Square in the centre of Chepstow. Other seating areas would be provided in Brunel Square which is intended as an area for public congregation.

6.2.5.2 A second major area of public open space would be around slipway 4 in the centre of the site. This would contain a more formal play area with a nautical theme and seating areas. Slipway 4 would be hard surfaced with feature paving, benches and interpretation boards. A further area of informal play would be provided adjacent to the footpath crossing the northern part of the site. This will contain a trim trail and other play features. There would be green public open space for informal play on either side of the riverside path and also a community orchard.

6.2.5.3 The amount of accessible recreational open space is 2.7ha which is in excess of the volume of land required under Fields in Trust (FIT) guidance for a scheme of 345 units. Recreational spaces are vital for health, well-being, and amenity and can contribute to an area's green infrastructure. The recreational spaces provided on this site will provide places for formal and informal play, sport, healthy physical activity and places to relax in the presence of nature, thus significantly contributing to the quality of life for residents. The layout of the site provides a network of high quality, accessible green spaces and recreation spaces which will also promote nature conservation, biodiversity and provide enjoyable opportunities for residents and visitors to participate in a wide range of physical activities. These activities will promote well-being.

Play Provision

6.2.5.4 In line with the Council's policies, the requirements of PPW10 and the outline planning permission, play provision is being provided throughout the site. PPW10 recognised that recreational spaces are vital for the health, wellbeing and amenity of the nation and that they can also contribute to an areas Green Infrastructure. There will be one Local Equipped Area for Play (LEAP), three Local Areas for Play (LAP), as well as opportunities for informal play throughout the site adjacent to the footpaths. These will be provided by the developers and maintained by a management company in perpetuity. Policy CRF2 of the LDP states that proposals for new residential development should provide appropriate amounts of outdoor recreation and public open space in accordance with the FIT minimum standards and make provision for allotments. The level of provision proposed by this development exceeds those minimum standards and also exceeds the levels set out in the Fields in Trust Guidance for Outdoor Sport and Play April 2018. The informal and formal

recreational spaces form an integral part of the development. The cycle ways, footpaths and informal recreational provision will be for the benefit of adults as well as children. The public open spaces provided on the site will be integrated and provide opportunity for biodiversity enhancement, ecological connectivity and pedestrian and cycle access both within the site and also linking into adjacent residential areas. While formal allotments are not being proposed within the site, an area has been set aside as a community orchard.

6.2.5.5 In total 2.7ha of public green space is being provided within the site which is in excess of the Councils Recreation and Public Space Standards and therefore accords with the provisions of Policy CRF2 of the LDP. The public open spaces, community orchard, public squares and recreational provision will all be maintained by a private maintenance company at the occupiers' expense.

6.3 Productive and Enterprising Places

6.3.1 Economic Development

6.3.1.1 As part of the outline application it was a requirement that the site provides at least 6500m² of flexible employment use. The current proposal indicates the location of 1.3 acres of employment land at the northern part of the site. The land has to be provided and serviced as part of this current application but the detailed layout and appearance of this element will be submitted as part of a separate application. The 1.3 acre provision is acceptable, however details have been provided on the layout plan indicating that 6500m² flexible working space can be provided on the 1.3 acre site in the form of several four-storey blocks of offices and therefore the requirements of the outline permission are satisfied. Four storey units fall within the size parameters of the outline approval. Four-storey development is considered acceptable in this location given the large vertical emphasis provided by the road and rail bridges adjacent to this part of the site and also because of the design precedent set by the adjoining Osbourne's development which has four-storey apartment buildings.

6.3.2 Tourism

This development may help to promote tourism in the area especially through the riverside path which it is hoped will eventually be incorporated into the Wales Coastal Path. PPW10 recognised the importance of long distance routes as important tourism and recreational facilities and advises LPA's to adopt positive approaches to proposals that utilise previously developed or disused land for tourism uses particularly in relation to urban regeneration. This proposal to provide a section of the Wales Coastal Path through the site conforms with the objectives of PPW10 in this regard and also to the Council's aim to encourage tourism throughout the County.

6.4 Distinctive & Natural Places

6.4.1 Landscape/ Visual Impact

6.4.1.1 PPW10 advises LPA's that landscapes are valued for their intrinsic contribution to a sense of place and their special characteristics should be protected and enhanced and used to create a valued place. At the outline stage it was recognised that this site provided a unique opportunity to reflect on its interesting historical past as a shipyard and engineering works. The design and layout has been carefully considered in order to preserve the industrial heritage of the site. For this reason the setting of Brunel House, a Listed Building has been enhanced, and the design of the buildings in the focal areas have been developed to reflect the industrial buildings which once stood on this site. The layout of the site is such that it affords interesting views within the site and also out of the site. The site is visually remote from other residential areas in Chepstow so that it is less important in this case that

the design of the development reflect neighbouring areas. There is a significant amount of Green and Blue infrastructure throughout the site; this conforms to PPW10 objectives for integrated GI and recreational provision. It also significantly contributes to the visual appeal of the area. Where possible views down the river have been provided. A Green Infrastructure Master Plan has been provided as part of the application. This clearly shows the level of landscaping throughout the site. In this case, the industrial landscape is being preserved in some locations such as around Brunel House and the slipways and in other areas it is being reflected through the design of new dwellings. This all contributes to a very strong sense of place in line with the objectives of PPW10 for protecting and enhancing landscapes.

6.4.2 Coastal Areas

6.4.2.1 The site is located on a tidal estuary which has a range of ecological designations. The estuary in this location has a very large coastal range and this has been accounted for in the design of the proposal

6.4.3 Historic Environment

Impact on Heritage Assets

6.4.3.1 There is a rich industrial heritage on this site. The piers and abutments to Brunel's Wye Bridge, just beyond the application boundary at the northern end of the site are Grade II Listed. The proposal will not affect that bridge with the only development in this area being the provision of a road and footpath link into the adjacent Osborn's development. The alignment of these features will be set away from the piers. The bridge structures will be protected by fencing on either side of the road and footpath. The railway bridge at the entrance to the site is also listed and will be protected and preserved as work to lower the road is undertaken and afterwards.

6.4.3.2 Brunel House is a Grade II listed building dating back to 1851. A public square will be provided in front of the building which will help to protect its setting. The other important historical asset on the site are the slipways which were used to launch new ships as well as steel work for the first Severn Crossing. The slipways have been determined to be of national importance and are currently in the process of being designated as scheduled monuments. It is proposed to leave the slipways clear of development and to restore one and preserve the other three. The proposed development of the site includes a form of public information/interpretation to be provided to help document the history of the site. Cadw have no objection to this proposal. The proposed changes will have a slight positive direct impact on the historic structures.

6.4.3.3 It is a requirement of PPW10 that the intrinsic qualities of the natural and built environment be protected in their own right for historic, scenic, aesthetic and nature conservation reasons. In this case the proposal seeks to protect Brunel House and its setting. Brunel House will have a dominant impact on the entrance to the site by virtue of its scale and elevated position. The positioning of a large open square at the front of Brunel House surrounded by three-storey dwellings will help to protect its setting and therefore accords with the advice given in PPW section 6.1.

Archaeology

6.4.3.4 As part of the outline application GGAT requires a written scheme of investigation. This identified two elements of the proposed development that would require mitigation: one being the buried archaeological resource; the other the historic buildings on the site. Regarding the buildings, these: "including a building associated with the First World War

development of the site as a shipyard. The application area is significant as one of the sites chosen for the assembly of N-type ships during the First World War; demand for vessels was high following extensive loss of merchant shipping at the start of the First World War and assembly sites for prefabricated N type ships were a vital part of the nation's response to this demand." Because of this a detailed building recording of surviving elements of the early shipyard and associated structures was required as the building formed part of the whole complex with the extant shipyard remains.

Those buildings have now been removed from the site and according to discussions, it appears that the previous landowner did undertake a photographic record but has not collated them into a record to submit to GGAT to date.

6.4.2.5 Regarding the buried archaeological resource, the slipways, GGAT recommended the submission and implementation of a written scheme of investigation to mitigate the impact of the development on the buried archaeological resource. This formed part of the document that GGAT approved in 2018. This will be implemented as part of the development and the report containing the results of this work would be submitted following the work. There is therefore no need for any further conditions.

6.4.4 Green Infrastructure

6.4.4.1 Policy GI1 of the LDP states that development proposals will be expected to maintain, protect and enhance Monmouthshire's diverse green infrastructure network by retaining individual green assets where possible and integrating them into the new development where possible and also by incorporating new and enhanced green infrastructure. This stance is also a requirement of PPW10. In this case, significant GI is being provided within the site as can be seen on the submitted Green Infrastructure Plan. There are salt march mud flats within the boundary of the site that are being retained. Beyond these would be a post and rail fence with a thicket hedge planted on the western side. There would be areas where the thicket would be lowered to allow for views out of the site and down the river. Beyond this would be a multi-use riverside path; it is intended that this will eventually form part of the Wales Coastal path. This riverside park would extend the whole length of the eastern part of the site. Towards the northern part of the site would be a green corridor running east-west. This would contain significant planting of specimen trees as well as informal recreational provision. A second corridor running east-west would be provided further south in the site, and would provide access beneath the railway bridge to the existing recreational ground in Garden City, this would also contain specimen trees. There would be an avenue of specimen trees planted along the main road through the site linking Brunel Square with Slipway 4. These trees would be planted in the highway and not in private gardens. In addition, there would be tree planting in the public realm including Brunel Square and the riverside park as well as significant planting throughout the site. Given that this was previously a built-up industrial site there will be significant enhancement as a result of this proposal.

6.4.5 Biodiversity

6.4.5.1 The site has a wide range of habitats and ecological assets. Most of the site was self-seeded scrub. There is an important block of trees running north/south along the railway embankment (this is outside the application site on land belonging to Network Rail). This band of trees provides a linear habitat for a variety of bat species. The River Wye, which forms the eastern boundary of the site, is designated as a Special Area of Conservation (SAC) principally for its population of uncommon migratory fish and otters. The banks of the river form salt marshes, mudflats and reed beds. Beaufort Quarry, adjacent to the site has been designated as a Site of Interest for Nature Conservation (SINC) and contains a wide range of wildlife. The River Wye adjacent to the site is also designated as a RAMSAR site for a variety of waterfowl. A low density population of slow worms is found throughout the

site and peregrine falcons, barn owls and other rare species are known to use the site. It is for this reason that an extensive range of 'blue and green infrastructure' is to be integrated into the site. A new Bat House has been built on the edge of the site close to Brunel House to compensate for the loss of roosting opportunities when the industrial buildings were demolished on the site. A Habitats Regulations Assessment was carried out for the outline application and has updated and assessed for the current application.

6.4.6 Flooding

6.4.6.1 Part of the site, the northern section and a strip of land adjacent to the river lies within Zone C2 as defined by the Development Advice Maps (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). As part of the previous outline application, the applicants submitted a Flood Consequences Assessment (FCA) that demonstrated that the consequences of flooding could be managed over the life time of the development. At the time, NRW was generally comfortable with its conclusions. The applicants have since provided details of the land raising under the bridges at the northern part of the site and NRW found these acceptable.

6.4.6.2 NRW have no objection to the current scheme on grounds of flooding but remind the applicants that given the proposals are situated along the river and the presence of flood defences to the north of the site there is a requirement for a Flood Risk Activity Permit for any works within 16m of this area. The area in the flood zone is in the northern part of the site, where the employment site is proposed and therefore does not form part of this current application. Employment land is not highly vulnerable development as defined in the TAN 15 guidance.

6.4.5.3 As part of outline submission a plan was produced (Drawing Number 7729:SK106) which showed the extent of the site that has to be raised to a level of 10.6 metres AOD (that was at the northern and southern ends of the site) and those areas where the levels were not to exceed 9.3 metres AOD, in order to allow a flood conveyance route from Chepstow. Those areas were adjacent to the river, next to the employment land, and under the two bridges at the extreme northern extent of the site. NRW approved of those and the current proposal must accord with those levels.

6.4.7 Water (including foul drainage / SuDS)

Foul Drainage

6.4.7.1 It is proposed that all the foul flows from the site would be discharged into existing public sewers which already cross the site. A hydraulic modelling assessment of the site was undertaken at the outline stage to assess the ability of the existing sewers to accommodate the proposed development. The capacity was found to be acceptable and Welsh Water confirm that, with some reinforcement work funded by the developer, the existing public sewers would be able to deal with the foul water discharged by the new development. The developers have now instructed Welsh Water to complete a further assessment to address levels of detriment caused by connecting the proposed development site into the surrounding sewerage system. The second hydraulic assessment has now been submitted and Welsh Water have no objection to the proposal. Welsh Water agree that detriment will be caused by the proposal but the detriment can be effectively managed by an engineering solution and the developers are going to progress with that solution. The foul water strategy is being considered as part of the discharge of condition application DM/2018/02091 and does not form part of the current application.

Sustainable Drainage for Surface Water

6.4.7.2 The current reserved matters application provides details the spine drainage through the site. This details on site foul and surface water drainage. The surface water management strategy is being considered via a separate Discharge of Condition application, DM/2018/02091, and details of the surface water strategy have been submitted as part of that application

6.4.8 De-risking (contamination issues)

Environmental Health Issues

6.4.8.1 There are public health issues related to the contamination of the site and disturbance from construction. The Fairfield Mabey site has been in use for heavy industry for over 100 years. During that time, buildings containing asbestos had been constructed and the soil and groundwater have been contaminated. As part of the Environmental Statement submitted with the outline application a Geo-Environmental Assessment and Contamination Report was included. MCC Environmental Health officers have reviewed this. Contamination has been identified in both soil and groundwater and further intrusive investigation will be required. In addition, the desk study identified potential sources of gas and vapour. It is anticipated that a gas and vapour sampling/monitoring regime will be necessary. Due to both the confirmed soil and groundwater contamination, the potential for further contamination elsewhere on the site, and the potential for gas and hazardous vapour generation, it is recommend that a site investigation and risk assessment procedure be undertaken by the developer in accordance with CLR11 "Model Procedures for the Management of Land Contamination". There is a requirement for ongoing monitoring of the site during the various construction phases. This is the subject of a Discharge of Condition Application. The Environmental Health Officers are satisfied that all the public health matters of contamination, remediation and monitoring can be resolved subject to conditioning.

6.4.8.2 The Environmental Statement also included a chapter on Noise and Disturbance during the construction phases. Possible temporary impacts of construction on the amenity of the neighbouring residential areas will be mitigated through planning conditions. A condition requiring the submission of a Construction Environmental Management Plan (CEMP) was also imposed to control such things as construction methods, hours of operation and phasing. This is also the subject of a separate discharge of condition application.

6.5 Response to the Representations of Third Parties and/or the Town Council

6.5.1 The majority of the objections received from residents relate to the principle of the development. The principle of the development has already been established though the Local Plan allocation and the outline planning permission. There are however comments that are pertinent to this reserved matters application and these will be addressed here. Firstly, residents are concerned about noise and disturbance during construction. Environmental Health officers are already monitoring the site with regards to dust and noise during construction but a condition can be imposed requiring a Construction Management Plan which could control hours of operation. There are concerns that the proposal will result in over-development of the site; the outline permission made provision for up to 600 units on this site and the allocation in the LDP Policy SAH3, refers to around 350 new dwellings being provided on this site during the LDP period. The total application site measures 19 ha, whilst the net residential developable area equates to 8.9ha. This equates to an average density of 39 dwellings per hectare across the site. This density is appropriate in this urban location. There is also concerns raised about the amount of open space being provided. As can be seen from the layout plan there is up to 2.7 ha public green space is being provided and this is greater than the requirements set out on Policy CRF2 of the LDP and the Guidance from Fields in Trust.

6.5.2 Several local residents have expressed concern over the mix of housing being proposed saying that there should be more small units to cater for local first time buyers. In this case, 22 of the units will be two-bedroom dwellings. The house builder has undertaken market research and believes that the housing mix proposed meets the demand in the area. There is also concern that standard house types have been used, while this is the case the standard house have been adapted in this case to reflect the industrial past of this site and to give a more bespoke appearance to the site. The S106 agreement that was signed as part of the outline approval is still relevant and runs with the land. The communal benefits still stand except for the quarry as this was considered too dangerous and the multi-use games area (MUGA) to be provided under Brunel Bridge, that cannot be delivered as the land is not in the applicant's ownership - it belongs to Network Rail. The Affordable Housing provision and the employment land are consistent with the outline permission but they will be delivered through a separate reserved matters application(s). The time scale for their delivery has not altered from that stipulated in the S106 agreement.

6.5.3 Neighbours are concerned about light spill from the development causing disturbance to adjoining properties. All the properties surrounding the site are set at a higher level and separated from the site by either the river or the railway line, for those properties facing into the site they will inevitably be able to see lights from the development but this will be no worse than when the site was used for industrial manufacturing of steel goods.

6.5.4 The Severn Princess will be kept in situ and the riverside path will run past it affording views of the boat. It is intended that the boat be restored by a charitable organisation and this is not the responsibility of the applicants. Similarly, the developers have indicated on the layout plan a possible site for the landing of the cycle/footpath over the River Wye that is being promoted by A-B Connecting Communities. As agreed at the outline stage, the layout of the development does allow for a southern access into the station on Network Rail land, if a new car parking area was to be provided for the station.

6.5.5 It has been suggested that the construction traffic will use Hardwick Avenue in Garden City. While the road under the railway bridge is being lowered for a period of approximately 6 months construction staff working on the remediation and the road lowering will travel to the site via Garden City and the tunnel under the railway line. All heavy machinery will be brought onto the site prior to this via Station Road so that there will be no construction traffic using Garden City, only the vehicles bringing the workers to the site and then only for a period of 6 months.

6.6 Well-Being of Future Generations (Wales) Act 2015

6.6.1 The duty to improve the economic, social, environmental and cultural well-being of Wales has been considered, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (the WBFG Act). In reaching this recommendation, the ways of working set out at section 5 of the WBFG Act have been taken into account and it is considered that this recommendation is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out in section 8 of the WBFG Act.

6.7 Conclusion

6.7.1 The principle of this development is already established via the designation within the LDP and the outline planning approval. The layout and design of this proposal provides a unique development that reflects its industrial past and promotes a strong sense of place that accords with the objectives of PPW10 and the policies of Monmouthshire LDP. The proposal will provide high quality development that reflects the distinctiveness of its location.

There would be a high proportion of Green and Blue Infrastructure within the site including the riverside path, green corridors and play provision. There is a large amount of tree planting throughout the site including a tree-lined avenue and a community orchard. The layout of the site has been carefully considered to invoke a sense of place and to provide key focal points throughout the site. The design of the dwellings and choice of finishing materials result in the proposal respecting the distinctive industrial heritage of the site and this includes preserving the setting of Brunel House.

7.0 RECOMMENDATION: APPROVE

Conditions/Reasons

1 The development shall be carried out in accordance with the list of approved plans set out in the table below.

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

2. Samples of the proposed external finishes shall be agreed with the Local Planning Authority in writing before works commence and the development shall be carried out in accordance with those agreed finishes which shall remain in situ in perpetuity unless otherwise approved in writing by the Local Planning Authority. The samples shall be presented on site for the agreement of the Local Planning Authority and those approved shall be retained on site for the duration of the construction works.

REASON: To ensure a satisfactory form of development takes place and to ensure compliance with LDP Policy DES1.

3. Prior to the construction of phase 1 of the development a Green Infrastructure (GI) Masterplan and GI Layout Plan for the pumping station area and electrical substation area shall be submitted to and approved in writing by the LPA. All works shall then be carried out in accordance with those approved plans.

REASON: To ensure a satisfactory form of development takes place and to ensure compliance with LDP Policy GI1.

4. Prior to the installation of the revetment structures, details of the monitoring of habitat restoration and if applicable, details of necessary intervention shall be submitted to the LPA for approval. The scheme shall monitor the condition of the habitat disturbed during the construction of the revetments and provide a scheme for reinstatement of these areas to riparian habitat which may include natural succession or intervention planting. The scheme shall thereafter be implemented within a timescale to be identified in the approved details and shall be maintained in accordance with the approved details.

Reason: to mitigate against the loss of potential supporting habitat of the River Wye SAC and European Marine Site.

5. Prior to the installation of the revetment structures, details of the 'readi rock' specification shall be submitted to and agreed with the Local Planning Authority. The specification shall reflect the treatment illustrated in Drawing AJA 2483.07 Riverside Park Landscape Materials Dated 21.03.19. The structures shall be implemented in accordance with the approved details and within a timescale that will be set out in the specification.

REASON: To ensure that it is visually acceptable and conforms with the objectives of Policy DES1 of the LDP

6. Details of the proposed fence along Network Rail land and its associated landscaping shall be agreed with the Local Planning Authority in writing before construction works commence on site and the development shall be carried out in accordance with those

agreed details which shall remain in situ in perpetuity unless otherwise approved in writing by the Local Planning Authority.

REASON: To ensure a satisfactory form of development takes place and to ensure compliance with LDP Policies GI1 and DES1.

7. Prior to construction work commencing on site, details of the location of all of the litterbins, seating, bollards, signage and all other street furniture shall be agreed with the Local Planning Authority in writing. The development shall be carried out in accordance with those agreed details and in accordance with a timescale to be agreed in those details, and the street furniture as agreed shall remain in situ in perpetuity unless otherwise approved in writing by the Local Planning Authority.

REASON: To ensure a satisfactory form of development takes place and to ensure compliance with LDP Policy DES1.

8. Prior to commencement of construction works on site, an amended GI Masterplan and Management Plan shall be submitted to and agreed in writing with the local planning authority. The Management Plan shall include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the GI Management Plan are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning GI objectives of the originally approved scheme. The Plan shall also indicate the timetable for the implementation of all open space, including that at Brunel Square, Bombardon Square and Slipway 4, the riverside footpath and all play areas.

The Masterplan and GI Management Plan shall be implemented in accordance with the approved details.

REASON: To maintain and enhance Green Infrastructure Assets in accordance with LDP policies DES1, S13, GI1, NE1, EP1 and SD4, The Well-being of Future Generations Act 2015 & Environment (Wales) Act 2016 10

9. In addition to the details supplied for the one LEAP and three LAP's, details shall also be submitted showing the specification and position of six interpretation rubbing posts. The agreed layout shall be approved in writing by the LPA before construction works commence and shall be implemented in accordance with those approved plans.

Reason: to ensure compliance with Policy GI1 of the LDP.

10. All hard and soft landscape works shall be carried out in accordance with the approved details and to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other recognised Codes of Good Practice. The works shall be carried out prior to the occupation of any related part of the development or in accordance with the timetable agreed with the Local Planning Authority in the revised GI Management Plan referred to in condition 10. Any trees or plants that, within a period of five years after planting, are removed, die or become, in the opinion of the Local Planning Authority, seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of species, size and number as originally approved, unless the Local Planning Authority gives its written consent to any variation.

Reason: To ensure the provision, establishment and maintenance of a reasonable standard of landscape in accordance with the approved designs and LDP Policy GI1.

11. The garages, hereby approved, for each plot shall be used in a manner that does not prevent the parking of a motor vehicle within them.

Reason: To maintain an adequate level of parking provision across the site in accordance with the adopted Monmouthshire Parking Guidelines.

12. The parking provision for plots 211 and 212 shall be retained in perpetuity and shall not form part of any private garden.

Reason: To maintain an adequate level of parking provision across the site in accordance with the adopted Monmouthshire Parking Guidelines.

13. Notwithstanding the provisions of Article 3, Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no fence, wall or other means of enclosure other than any approved under this permission shall be erected or placed without the prior written approval of the Local Planning Authority.

Reason: to ensure the development is maintained to a good standard of design, in accordance with Policy DES1 of the LDP.

14. The fence to the south end of slipway 4 shall be quayside and slipway railing only.

Reason: in the interests of the visual amenity area and to accord with Policy DES1 of the LDP.

15. The riverside footpath shall be 3m wide and constructed with a resin bond material, details of which shall be agreed in writing with the Local Planning Authority prior to any section of the riverside path being constructed. The path shall be constructed and maintained in the agreed material in perpetuity.

Reason: to provide a durable and visually attractive surface for this footpath link and to ensure the development creates a permeable layout that promotes active travel.

16. Prior to commencement of development, the developer shall display a site notice in accordance with the terms of Schedule 5A Article 24B(2) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended) to inform the local planning authority and the public that a commencement of works is to start, and that all pre-commencement planning conditions have been discharged. The planning authority shall also be notified directly of this intention.

Reason: to comply with the terms of Schedule 5A Article 24B(2) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)

Informatives:

1. For the purposes of interpreting these conditions, *construction works* do not include on-site remediation works or any associated off-site highway works required to facilitate the development.

2. In relation to condition 2 above, the plots forming Brunel Square shall be finished with a natural slate, a sample of which is to be agreed under condition 2. These plots are shown on drawing Materials Layout sheet 1 of 2 – drawing no. 0653-108-1 and for clarity are Plots 63 – 66 (inclusive), 82 – 90 (inclusive) and 209 – 215 (inclusive).

