

Draft Infill Development (H1, H2 & H3) SPG Consultation Responses					
Representor Number	Representor	Object/Support/Comment	Comment	LPA Response	Recommendation/Action
1.1	Mrs Lynne Morgan	Comment	My comments relate to sites CO.6 and CO.7 which are sites around the village of Mathern (identified as a Main Village in Monmouthshire Policy S1). Both sites are described as being of high/medium landscape sensitivity with low housing capacity. They include existing parkland, grazing and conservation areas mainly as part of the former Wyeland Estate.	Comment noted. The aim of this SPG is to set out further guidance on the main planning material considerations that will be taken into account by the Council when reaching decisions for infill development. This comment is related to two specific sites rather than commenting on the content of the SPG itself.	No change necessary.
1.2		Objection	The introduction of any proposed infill sites would adversely affect the “distinctiveness” of the village and would start the insidious process of Mathern being engulfed by Chepstow with the piecemeal development of land around Chepstow. My objections are based on item 1.3c in the Supplementary Planning Guidance. Additional infill housing would not “make a positive contribution to the creation of distinctive communities”.	Objection noted. Infill development should make a positive contribution to the creation of distinctive communities (para 1.3c). The aim of this objective is to assist in the delivery of placemaking, which aligns with the concepts embraced throughout the latest edition of Planning Policy Wales, PPW10.	No change necessary.
1.3		Objection	The introduction of any proposed infill sites would adversely affect the “distinctiveness” of the village and would start the insidious process of Mathern being engulfed by Chepstow with the piecemeal development of land around Chepstow. My objectors are based on item 1.3d in the Supplementary Planning Guidance. Additional infill housing would not “respond to the context and character of the area”.	Objection noted. Infill development should make a positive contribution to the creation of distinctive communities (para 1.3c). The aim of this objective is to assist in the delivery of placemaking, which aligns with the concepts embraced throughout the latest edition of Planning Policy Wales, PPW10.	No change necessary.
1.4		Objection	The introduction of any proposed infill sites would cause a loss in biodiversity by the destruction of hedgerows and deciduous woodland.	Objection noted. Each planning application will be treated on its merits. If an infill development involves the removal of existing trees and hedgerows, appropriate biodiversity mitigation may be possible to replace them. Infill development may sometimes enhance the biodiversity of the site as the applicants will be encouraged to plant native species in their proposals, even where there is to be no loss of existing trees and hedgerows.	No change necessary.
1.5		Objection	Any increase in housing would inevitably add to the severe congestion problems in and around the area.	Objection noted. The Council's Highways Department will be given the opportunity to offer their expert advice on this matter during the formal planning process.	No change necessary.

1.6		Objection	There are already excessive levels of pollution caused by increased traffic and local readings have already exceeded limits set by W.H.O. for particles which increase the link to lung cancer, pneumonia and other diseases. Without any new infrastructure any additional housing can only have a detrimental effect on the area.	Objection noted. The Council's Environmental Health Department will be given the opportunity to offer their expert advice on this matter during the formal planning process.	No change necessary.
2.1	Ann Langford	Comment	I agree that key matters to be considered when undertaking a site appraisal should include: Adjoining land uses, Existing landscape feature and Views into, from and across the site. However I fail to see how the following guidance would help developers achieve these objectives in the case of backland development. Many existing properties which could be affected by backland development currently enjoy marvellous views of the countryside which would be totally obscured if a three storey town house were built literally just at the end of their garden.	Comment noted. The loss of a view is not a planning material consideration. The aim of this SPG is to set out further guidance on the main planning material considerations that will be taken into account by the Council when reaching decisions for infill development. Each planning application will be treated on its merits and one of the overarching objectives for Infill development set out in this SPG is to respond to the context and character of the area (para 1.3d). The SPG also sets out guidance on how to ensure new development is a good neighbour to existing properties.	No change necessary.
2.2		Comment	A distance of 21m between dwellings (7.9) is much too small to ensure that new buildings are not intrusive when viewed from existing gardens or from within dwellings. This distance represents for many the length of their garden alone. Thus I suggest that the guidance is amended in the case of backland development to specify that a. The height of the proposed building should not be greater than adjoining existing dwellings b. The building should be situated at least a "garden length" or 21m away (whichever is the larger) away from the boundary of the adjoining existing garden.	Comment noted. Para 7.9 of the SPG relates to driveway screening and not the distance between dwellings. The Council's normal privacy standard for new residential development is that there should be minimum of 21m between directly facing elevations containing main habitable room windows (i.e. bedrooms and living rooms). When the principal elevation with main habitable windows of an infill development is not aligned against the side elevation of a neighbouring dwelling , para 7.9 of the SPG is seeking at least 10m separation distance between a proposed first floor habitable room window and the opposite garden boundary of a neighbouring property. This separation distance is generally acceptable. The existing standard of amenity will also be taken into account when applying Policies DES1 and EP1 of the LDP.	No change necessary.
3.1	PUBLICA (Sarah Toomer)	Comment	We currently do not have any comments to make. If there are any changes in the future we would be happy to be consulted again.	Support welcomed.	No change necessary.
4.1	Natural Resources Wales	Support	We note and welcome 1.3 Objective a): efficient use of brownfield land (page 1).	Support welcomed.	No change necessary.

	(Annabelle Evans)				
4.2		Support	We note and welcome Box 2 Clear information on Welsh Government Policy relating to C2 and highly vulnerable development (page 2).	Support welcomed.	No change necessary.
4.3		Support	We note and welcome 3.5 Strongly recommending professional advice is sought regarding flooding and ecology (page 4).	Support welcomed.	No change necessary.
4.4		Support	We note and welcome Table 2 Key considerations, including: Flood risk assessment, habitat and or protected species surveys, drainage, landscaping, green spaces and linkages. (page 4).	Support welcomed.	No change necessary.
4.5		Support	We note and welcome 9.3 'Ecology' (page 14)	Support welcomed.	No change necessary.
4.6		Support	We note and welcome Detailed Consideration F: Foul Drainage (page 15).	Support welcomed.	No change necessary.
4.7		Comment	You may wish to consider including advice relating to Watercourses Advising that sites adjacent to/traversed by watercourses will need to take this into account, with provision of advice on culverting, permits/consents for works, any required buffer zones/access required to riverbank, runoff, etc.	Comment noted. We welcomed the suggestion to include advice relating to watercourses.	To insert Watercourses on Table 2 as a Key Matter to be considered when undertaking a Site Appraisal. In Monmouthshire, we often receive planning applications that may have a direct/indirect impact upon a watercourse. Therefore, it will be useful to add a new para 9.4, advising that watercourses will need to be taken into account and to contact NRW for permits/consents for works and so on. In addition, replace the heading Planting Trees with Natural Resources.
4.8		Comment	You may wish to consider including advice relating to Contaminated Land Advising that, where appropriate, the need for professional assessments may be required.	Comment noted. We welcomed the suggestion of raising the awareness of contaminated land.	To insert Contaminated Land on Table 2 as a Key Matter to be considered when undertaking a Site Appraisal.
4.9		Comment	You may wish to consider including advice relating to Designated Sites Advising that proposals must not compromise areas protected for their ecological and/or geological qualities and potable water supplies.	Comment noted. We welcomed the suggestion to include advice relating to Designated Sites.	To insert Designated Sites on Table 2 as a Key Matter to be considered when undertaking a Site Appraisal. In addition, add a new para 9.5, advising about the Council's vision in maintaining and improving the biodiversity and geology of the County through the protection, restoration and enhancement of valuable ecological habitats, wildlife networks and corridors, as well as the creation of new habitats.

5.1	Mathern Community Council	Comment	<p>The document is a common sense and useful guidance document that sets clear parameters.</p> <p>The only query we would raise is if the guidance should just apply to sites within village Development Boundaries.</p> <p>There are a number of redundant infill/backland sites in various villages that are not within Development Boundaries but if the criteria noted within this guidance were applied could be sensitively developed without detracting from the area.</p>	<p>Comment noted. There will be a presumption in favour of new residential development within the designated settlements' development boundaries as defined within the LDP, subject to detailed planning considerations. Outside the Development Boundaries open countryside policies will apply, except in relation to Minor Villages. All residential infill development proposals, whether it is within or out of the designated development boundaries, will be assessed against this SPG.</p>	<p>No change necessary. It is considered that the SPG is sufficiently clear on this issue and applies the guidance against the framework of the LDP settlement hierarchy.</p>
6.1	Abergavenny and District Civic Society	Comment	<p>We recall a SPG Preparation Programme agreed by Planning Committee in May 2016 and note that this is a departure from that programme, though design guidance on Householder Extensions was in the second priority list. However, we note that SPG on Infill Development has since been requested by Planning Committee. The present draft touches on extensions and it would not require a great deal of extra work to be a comprehensive Residential Development Design Guide SPG.</p>	<p>Comment noted. The need for the Infill Development SPG has been identified by the members of the Planning Committee as an important piece of guidance to assist the Council when reaching decisions on infill development planning applications. The Householder Extensions Design Guidance SPG is Second priority that is dependent upon other work streams. Currently, there is no plan for a comprehensive Residential Development Design Guide SPG.</p>	<p>No change necessary.</p>
6.2		Support	<p>We support the preparation of an annually reviewed SPG Programme, providing a list of SPG priorities for preparation. It provides a useful mechanism for the Council to reassess its priorities and respond to changing national and local circumstances. It also provides a useful guide for stakeholders to have knowledge of the Council's SPG preparation priorities and when they are likely to come forward.</p>	<p>Support welcomed.</p>	<p>No change necessary.</p>
6.3		Comment	<p>While much of this SPG's guidance is likely to be familiar to professional developers and their advisers, it is good to see the Council's expectations in an SPG. The SPG is intended to amplify LDP Policy DES1, especially criteria c, d, i, and l, and this context should be stated at the beginning. Much of the guidance would also be usefully applicable to larger new housing developments.</p>	<p>Comment noted. We welcome the suggestion to insert Policy DES1 of the LDP into this SPG due to its relevance.</p>	<p>Add another para on page 1 to explain the relevance of this SPG to Policy DES1 of the LDP. In addition, Policy EP1 of the LDP should be included as it seeks to prevent unacceptable harm to the amenity of the neighbouring properties, which is also what this SPG is trying to achieve. Add on the end of para 1.2 that... As well as this SPG, other key LDP Development Management Policies also need to be complied with. Policy DES1 requires, among other things, development to respect the character and appearance of the</p>

					area. Policy EP1 seeks to require all development proposals to have regard to the privacy, amenity and health of occupiers of neighbouring properties.
6.4		Comment	A danger of such guidance is that it can lead to inflexibility. The draft includes many paragraphs that do indicate flexibility, for example those referring to the differing character of areas and para 6.8 (Corner Sites). However, we would like to see a general statement at the beginning that the planning authority is willing to consider departures from some parts of the guidance where the designer of the development makes a convincing case for doing so. For example, while rigidly applied building lines and height restrictions can protect the rhythm of some streets, in some circumstances they could prevent a new building that would make a positive contribution to an otherwise undistinguished street.	Comment noted. We welcome the suggestion.	Add another para on page 1 to advise that the Council recognise that each development site has different characteristics. The onus is on the applicant to demonstrate that the proposed infill development would make a positive contribution to the quality of the street/area and with no adverse harm to the amenity of the neighbouring properties.
6.5		Comment	The text accompanying Sketch 1 refers to the rather obscure but often-used term 'mass' where 'size' and 'height' might be clearer. For reasons of flexibility we would prefer to read that it 'would not normally be acceptable'. Similarly Sketch 3 might say 'normally unacceptable'. Many streets are not as regular or rhythmic as implied by the sketches, especially those that are likely to offer infilling opportunities. Streets with the greatest character and placemaking appeal are often those presenting variety within a relative consistency.	Comment noted. We recognise that many streets are not as regular or rigid as implied by the sketches within the SPG. The use of 'would not normally be acceptable' or 'normally unacceptable' is considered appropriate.	Amend and insert 'would not normally be acceptable' or 'normally unacceptable' accordingly.

6.6		Comment	<p>Some planning authorities make a distinction between 'tandem backland development', where a single dwelling is proposed in the rear garden of a single house, and 'comprehensive backland development' where several rear gardens are assembled for a larger development. Tandem backland development is often resisted by planning authorities, but your guidance seems applicable to both circumstances, likely to rule out many tandem proposals. There may sometimes be a need to take into account the possibility of a tandem development being subsequently used to access further backland. Clearly a succession of tandem developments, each with a highway access, could be unacceptable to the highway authority.</p>	<p>It is acknowledged that some local planning authorities use different terms for backland infill development i.e. tandem/comprehensive backland development. For this SPG, backland sites can be defined as a landlocked site, which may have a considerable number of 'inactive' frontages surrounding the site boundary (i.e. fences or walls). They may also be located behind existing buildings such as rear gardens and private open space, usually within predominantly residential areas. In terms of the acceptability of the access of the proposal, the Council's Highways Department will be given the opportunity to comment on this element at the formal planning application process.</p>	No change necessary.
6.7		Comment	<p>Paras 2.2 (note that you have two) and 2.3 : We understand the reason for normally restricting infill development in Minor Villages to 1 or 2 dwellings in small gaps. We also understand the need to prevent multi-clustered or loosely-knit Minor Villages from coalescing, perhaps via one or two dwellings on large plots, but we cannot understand why small gaps within a cluster should be unacceptable. We note the mention of pre-app enquiries but some clarification in the SPG would be helpful.</p>	<p>Comment noted. Duplication of para number 2.2 and correction will be required for this. The Council recognises that some Minor Villages comprise of two or more separate populated clusters and the purpose of para 2.3 is to prevent the gaps between these populated clusters from coalescing, which is considered to be inappropriate. Therefore, it is important for the applicant to seek clarity with the Council via the pre-application enquiry service.</p>	<p>Amend para number and add to para 2.3 that infill development may be acceptable in the small gaps within a cluster. However, the Council will prevent the gaps between the populated clusters from coalescing, which is considered to be inappropriate.</p>
6.8		Comment	<p>We would suggest that Para 6.7 might be slightly modified: Where existing plot boundaries form a distinctive part of the street scene, these boundaries must be retained and replicated through appropriate building design and landscape treatment. In most cases, particularly if backland infilling, it will be necessary to consider screening the boundaries of a new development for privacy reasons and to reduce noise and disturbance. Brick or stone walls have better noise attenuation qualities than fences or hedges and will be most appropriate where possible sources of noise would be close to an existing house, or the garden area immediately outside it.</p>	<p>Comment noted. We agree the insertion of 'particularly if backland infilling' will further clarify the importance of having appropriate screening, particularly, for backland sites.</p>	<p>Add 'particularly for Backland Sites' in second sentence of para 6.7. The terms 'Backland Sites' will be used instead of 'backland infilling' to ensure consistency throughout the SPG.</p>

6.9		Comment	Para 7.7: Sketch 6 - some authorities will accept a minimum of 12.5m.	Comment noted. It is acknowledged that some planning authorities accept various distances between principal elevations with main habitable windows and side gable walls without windows.	To provide more flexibility, it is proposed to replace 'there must be at least 15m' by 'there should be at least 15m' in para 7.7. In addition, remove the last sentence of 7.7 as it is referring to screening.
6.1		Comment	Para 7.9 is unclear.	Para 7.9 refers to the prevention of light intrusion to existing properties from the movement of vehicles from the infill development.	Amend para 7.9 to... 'Care will need to be taken to ensure that there is adequate screening to prevent light intrusion from the movement of vehicles associated with the infill development.'
6.11		Comment	Para 7.12 (bottom line of l/h column) mis-spells 'existing'.	Comment noted. Correct mis-spell.	Correct 'existings' to 'existing'.
6.12		Comment	Para 8.4 specifies a 0.5m overhang strip; for clarity it would be helpful to cross-reference this to the 2.0m requirement of para 8.10.	Comment noted. We agree a 0.5m overhang strip should be provided where possible along the driveway of a new access serving a Backland Site.	Add to para 8.10 'Where possible, a 0.5m overhang strip either side of the driveway should be provided to ease the flow of vehicles'.
6.13		Comment	References to vehicular visibility splays in paras 8.5 and 8.7 need to be cross-referenced/reconciled.	Comment noted. Cross-reference visibility splays in para 8.5 and 8.7.	Add 'Any visibility splay below the required standard would need to be justified via appropriate traffic survey' in para 8.5. Amend 'Table 6 refers' to 'Refer to Table 6 for further information).
7.1	Canal River Trust (Jane Henell)	Comment	I can confirm that the Trust have no comments to make.	Comment noted.	No change necessary.
8.1	The Coal Authority (Melanie Lindsley)	Comment	<p>As you will be aware there are coal mining legacy risks in Monmouthshire including; mine entries, recorded and unrecorded shallow coal workings and areas of surface mining activity. There is also surface coal resource present in the area.</p> <p>It is noted that in Section 3 of the report, which deals with site appraisals, you have included a list of key matters which need to be considered when undertaking appraisals. These are set out in Table 2.</p> <p>We are disappointed to note that coal mining legacy issues have not been identified as something which should be considered at this initial stage. We are of the opinion that it is fundamental that ground conditions and the risks posed to the site/development by past coal mining activity are included as a key matter for consideration at the initial site appraisal stage.</p> <p>We therefore recommend that Table 2 in</p>	Comment noted. This SPG only applies to the Monmouthshire Administrative Area, there are no coal mining legacy risks within this area. These areas are located outside Monmouthshire in the Brecon Beacons National Park.	No change necessary.

			the SPG is amended to include... Ground conditions assessment (Coal Mining Risk Assessment, or equivalent report).		
9.1	Mrs Joan Hodgikiss	Comment	I have no comments on the proposed SPG but would appreciate further information whenever it becomes available.	Comment noted.	No change necessary.
10.1	Powells Chartered Surveyors	Comment	The council should allow extensions of both main and minor villages of an appropriate scale (up to 10 units) on a case by case (unallocated) basis providing the dwellings would fit the village form, with an appropriate percentage level of affordable housing (say 35%). Wales like in England benefits from the fabric of the rural countryside being reliant thriving villages, and growing rural communities. With more people working from home and using the internet to work, the need to travel by car in many instances is diminishing therefore improving the sustainability of living in rural locations. Although this point isn't strictly about the infill policy, we feel the LPA should be made aware of the opinions of the majority of planning professionals working throughout Monmouthshire.	Comment noted. The aim of this SPG is to provide guidance on small scale (fewer than 10 dwellings) infill development. With regard to the expansion of the villages, this element of the LDP will be considered as part of the LDP review.	This comment is not commenting on the content of the SPG itself. Therefore, no change is necessary.
11.1	Cadw (Helen May)	Comment	Table 2 - Key Matters to be Considered When Undertaking a Site Appraisal - should include "impact on setting of listed buildings and scheduled monuments".	Comment noted. We agree that the impact on the setting of listed buildings and scheduled ancient monuments is a	To add 'Impact on the setting of listed buildings and scheduled ancient monuments' in Table 2.

				key matter to be considered when undertaking a Site Appraisal.	
11.2		Comment	Useful References - could include WG guidance Setting of Historic Assets in Wales.	Comment noted. We agree it is useful to include Welsh Government guidance on Setting of Historic Assets in Wales in Table 6.	To add 'Setting of Historic Assets in Wales' in Table 6.
12.1	Mr and Mrs W.R. + J.O. Hall	Comment	There is a need to review the Council's affordable housing policy. A greater density of housing development should be applied (i.e. more than 30 dwellings per hectare). Also, the conversion of existing buildings to social housing should be encouraged.	Comment noted. This representation however refers to other LDP Policies rather than the content of the SPG.	No change necessary.
13.1	James Harris	Comment	The land to the rear of Myrtle Cottage Caerwent meets all the policy criteria set out in the consultation document.	Comment noted. This representation is site specific rather than commenting on the content of the SPG itself.	No change necessary.
14.1	Councillor Louise Brown	Comment	This SPG should provide further clarity on how 'neighbours' are defined in relation to infill and backland development (i.e. immediate or wider context).	Comment noted. It is considered impractical to define who the neighbours are for infill development as each planning application will be treated on its merits. Therefore, the application case officer will assess this element on a case by case basis.	No change necessary.
14.2		Comment	To highlight more specific detailed considerations for backland development only.	Comment noted. It is not considered practical to make/separate specific reference between backland sites and infill sites as some of the material considerations overlap. An additional diagram will be included in the guidance to explain this further.	Add diagram to explain a typical backland development
15.1	Councillor Mathew Feakins	Comment	To include more specific reference to affordable housing/ SuDS in relation to infill development.	Comment noted. The aim of this SPG is to set out further guidance on the main planning material considerations that will be taken into account by the Council when reaching decisions for infill development. This SPG does make readers aware about the Council's Affordable Housing Policy para 11.4 and the importance of the new statutory SuDs standards para 10.4. Please note that there is a specific Affordable Housing SPG, which contains up to date information about this topic. As to the SuDS, the readers are advised to contact the SuDS Approving Body for more specific formal guidance.	No change necessary.

16.1	David Wong	Comment	The distance required in para 7.7 and 7.8 is different i.e. 15m and 10m respectively.	Para 7.8 is meant to ask for at least 10m from the rear elevation of the infill development to the side boundary of the neighbouring property where the proposed rear principal elevations (with habitable windows) are not aligned with the side elevations of the neighbouring property. It is appreciated that there may be times where a greater distance is required. Therefore, a sentence will be added to advise that this element will be assessed on a case by case basis.	Replace the first para 7.8 to... 'Where the proposed rear principal elevation (with habitable windows) is not aligned with the side elevations of the neighbouring property, it is normally required that there should be at least 10m from the rear principal elevation of the infill development to the side boundary of the neighbouring property. However, there may be times where a greater distance is required than 10m. Therefore, this element will be assessed by the Council's Development Management Officers on a case by case basis.
16.2		Comment	Mis-spell 'ther' on para 7.4.	It is meant to say 'there'.	Replace 'ther' by 'there'.
17.1	Andrew Nevill	Comment	1.3 overarching objectives a) the land may be greenfield as well for backfill sites	Comment noted. We agree that 1.3a could also be greenfield land as well as brownfield land.	Add 'greenfield and' in para 1.3a.
17.2		Comment	f) consider the GI functions, natural environment, ecological assets	We agree that this SPG can also make positive contribution to the GI functions, natural environment, ecological assets.	Add 'f. Consider the Green Infrastructure functions, natural environment, ecological assets'.
17.3		Comment	Box 1 also end / corner site infill ref to 6.8	We welcomed the suggestion of having the corner sites in Box 1 as another common form of infill.	Add Corner Sites along with a diagram in Box 1.
17.4		Comment	Table 2 also previous land use Invasive weeds/ contaminated land	We welcomed the suggestion of including previous land use and contaminated land in Table 2: Key Matters to be Considered when undertaking a Site Appraisal.	To add 'Previous land use' and 'Contaminated land' in Table 2.
17.5		Comment	Table 3 also Material choice Biodiversity , habitat and GI benefits	Para 6.6 relates to Building Materials, which is under the Detailed Consideration B - Design heading in Table 3. In addition, we agree that the heading for Detailed Consideration E Planting/Trees be amended to Natural Resources.	Amend the heading from Planting/Trees to Natural Resources and Green Infrastructure in Table 3 (and on page 14 of the SPG).
17.6		Comment	A GI assessment in line with the GI SPG may be required to inform design reference to the Website link in Table 2	We welcomed this suggestion and GI is an important element to assist placemaking.	Add GI assessment in Table 2 as a key matter to be considered when undertaking a Site Appraisal.
17.7		Comment	6.4 Sketch 3 :- not necessarily...in a village street with no GI / ecological connectivity a build slightly set back may provide an opportunity for appropriate street tree or appropriate vegetation to be included to provide multiple benefits. Terminology that indicates that there is a preferred option but it would be considered site by site	Comment noted. We recognise that many streets are not as regular or rigid as implied by the sketches within the SPG. The use of 'would not normally be acceptable' or 'normally unacceptable' will be used to allow some flexibility.	Amend and insert 'would not normally acceptable' or 'normally unacceptable' on relevant sketches accordingly.

17.8		Comment	6.7 Sketch 4 not necessarily ... street trees may be acceptable	Comment noted. We recognise that many streets are not as regular or rigid as implied by the sketches within the SPG. The use of 'would not normally be acceptable' or 'normally unacceptable' will be used to allow some flexibility. In addition, to delete the last sentence of para 6.7 so not to suggest Brick walls are the only option available for noise attenuation.	Amend and insert 'would not normally be acceptable' or 'normally unacceptable' on relevant sketches accordingly. In addition, to delete the last sentence of para 6.7 so not to suggest Brick walls are the only option available for noise attenuation.
17.9		Comment	7 you may wish to indicate FIT guidelines re proximity to existing play areas	The Fields In Trust (FIT) champions and supports our parks and green spaces by protecting them for people to enjoy in perpetuity. Reference to this guidance can be inserted in Table 2, which is to form part of a Site Appraisal.	Insert 'Field In Trust Guidance' in Table 2 as a matter to be considered when undertaking a Site Appraisal.
17.10		Comment	8 you may wish to indicate that electric charge points could be considered subject to infrastructure availability	We welcome this positive suggestion. In addition, it is considered that broadband connection is important to be added.	Insert 'electric charging points and broadband connections' in para 8.2.
17.11		Comment	9 make reference to the landscape and ecological benefits being informed by the GI SPG assessment process with links to the website for further information and guidance	We welcome this suggestion.	Add para 9.4 to state that... Green infrastructure comprises natural and managed green spaces and other environmental features within urban and rural settings which provide benefits for the economy, local residents and biodiversity. Policy GI1 of the Monmouthshire Local Development Plan seeks to ensure that development proposals maintain, protect and create new green infrastructure, where appropriate.
18.1	Andrew Jones (Monmouthshire County Council)	Comment	Spotted a typing error (last sentence of para 3.3). It should say Section 12.1 not Section 10 of this Guidance...	Commented noted. It is a typing error and it will be corrected as suggested.	To make correction as suggested. It should say Section 12.1 not Section 10 of this Guidance.
18.2		Comment	The latest Affordable Housing SPG was adopted in July 2019. Therefore, please make sure the Affordable Housing SPG URL in para 11.4 and Table 6 is up to date and is it possible to include the Affordable Housing financial contribution formula in this section of the Guidance?	Comment noted and the latest URL will be used. With regard to the inclusion of the formula for working out the required financial contribution, the Commuted Sum Rate differs from place to place and the adopted Affordable Housing SPG comprises detailed guidance on the considerations that will be taken into account by the Council when reaching decisions on planning applications. Therefore, to avoid duplication and confusion of this matter, the formula will not be included in this SPG.	Update the Affordable Housing URL in para 11.4 and Table 6 accordingly.

19.1	Tudor Gunn (Monmouthshire County Council)	Support	This SPG will be a useful document to use for infill development.	Support welcomed.	No change necessary.
20.1	Green Infrastructure Team (Monmouthshire County Council)	Comment	We suggest the detailed consideration is renamed to reflect the matters it covers i.e. not just trees and planting but also hedgerows, wider ecology and the role that semi-natural habitats have in climate mitigation.	Comment welcomed.	Alter (Derailed Consideration E) Planting Trees to Green Infrastructure.
20.2		Comment	We need to cross ref the GI SPG , Monmouthshire Landscape Sensitivity and Capacity Assessment and emerging Landscape Character Assessment (LCA) SPG up front in the document (the latter is going out shortly and we need to make sure it is cross referenced). Overarching objectives needs to include in 1.3 a “Deliver a proposal which embraces Green Infrastructure Principals.”	Comment welcomed. The consideration of Green Infrastructure play a key part for development proposals and this element is embraced throughout the Planning Policy Wales Edition 10.	To add as 1.3 a Deliver a proposal which embraces Green Infrastructure Principals.
20.3		Comment	Point 2.2 this would need to be informed by baseline data using MCC’s GI SPG, Landscape Sensitivity and Capacity Assessment, LANDMAP data and the emerging Landscape Character Assessment (LCA) SPG.”	Comment broadly welcomed. However, draft guidance such as the emerging Landscape Character Assessment (LCA) SPG carries little weight and it would be premature to refer to it.	Add to para 2.2 that... this should have regard to baseline data using MCC’s GI SPG and LANDMAP.
20.4		Comment	3.3 Please add ref to the need for a “Landscape and GI specialist consultees”.	Comment welcomed.	To add a reference in para 3.3 to the need for a GI specialist.
20.5		Comment	Table 2 should include : • A landscape and visual impact assessment (LVIA) which needs to use LANDMAP data and MCC’s Landscape Sensitivity and Capacity assessment and the emerging Landscape Character Assessment (LCA) SPG. • A GI assessment in line with the GI SPG (as Andrew Nevill’s comments)	Comment welcomed.	Refer to Representator Number 17.6
20.6		Comment	Table 3 – needs to include another heading : H : Green Infrastructure (this is essential)	Comment welcomed. Green Infrastructure play a key part for development proposals and this element is embraced throughout the Planning Policy Wales Edition 10.	Table 3 will alter Planting Trees (Detailed Consideration E) to Natural Resources and Green Infrastructure.

20.7		Comment	Detailed Consideration for A, B, C, D, E, F needs to ref GI in all design considerations therefore include the following statement: “ Proposals should take account of the multifunctional GI assets and opportunities when considering design proposals.”	Comment welcomed.	Add 9.1... Green Infrastructure play a key part for development proposals and this element is embraced throughout the Planning Policy Wales Edition 10. Therefore, all proposals should take account of the multifunctional GI assets and opportunities.
20.8		Comment	Section 5 We need to ref the emerging Landscape Character Assessment (LCA) SPG.	Comment noted. However, draft guidance such as the emerging Landscape Character Assessment (LCA) SPG carries little weight and it would be premature to refer to it - especially as it may be subject to change.	No change necessary.
20.9		Comment	On trees in particular, we suggest that the section should begin by talking about the importance of retaining existing trees and then go on to encourage the planting of appropriate trees in the new curtilage(s). These don't necessarily need to be native trees in an urban setting but it would be appropriate to seek native stock in the villages. This consideration should make reference to the role of Green Infrastructure trees and semi-natural habitats in carbon capture, water storage and pollution absorption particularly in light of the Council's declaration of a climate emergency and the strengthening of policy in PPW10. Therefore, development shall be designed to retain trees and undertake additional planting.	Comment noted and will add another para to 9.1 with a new heading - Green Infrastructure. Also, to modify the second sentence of 9.1.	A new para 9.1 to say...Green Infrastructure (GI) including trees and semi-natural habitats are important in carbon capture, water storage and pollution absorption and these assets are fully supported by PPW10. Green infrastructure comprises natural and managed green spaces and other environmental features within urban and rural settings which provide benefits for the economy, local residents and biodiversity. This policy seeks to ensure that development proposals maintain, protect and create new green infrastructure, where appropriate.

					Add new par 9.4 to make reference to retaining existing good quality trees and to encourage new, appropriate planting.
20.10		comment	Ecology on infill sites is wider than just species considerations as we have to consider the presence of priority habitats which is a challenge for both rural & urban sites. We consider that detail on protected species processes here might not be that helpful as it makes it sound like a difficult process and may inadvertently encourage developers to clear sites prior to site design. It might be better to stick to the principles of designing with biodiversity in mind with acknowledgement of the consideration of protected species. We suggest removal of point 9.3 and replacement with... Infill sites can be rich in biodiversity and provide important stepping stones and connections for wildlife in the landscape. Therefore, scheme design will need to be informed by a Preliminary Ecological Appraisal (PEA) and where appropriate species surveys and an Ecological Impact Assessment. Many species are protected by law and habitats and species are afforded detailed consideration through planning policy. All development must demonstrate that there will be no net loss of biodiversity and that biodiversity net gain can be delivered for example through the improved management of retained habitats, the addition of appropriate planting and provision of hedgehog highways, bird nesting and bat roosting opportunities in the scheme design.	Comment noted and will replace para 9.3 as suggested.	Will remove point 9.3 and replacement it with new par. 9.6...Infill development plots can be rich in biodiversity and provide important stepping stones and connections for wildlife in the landscape. As such, scheme design may need to be informed by a Preliminary Ecological Appraisal (PEA) and where appropriate species surveys and an Ecological Impact Assessment. Many species are protected by law and habitats and species are afforded detailed consideration through planning policy. All development should demonstrate that there will be no net loss of biodiversity and that biodiversity net gain can be delivered for example through the improved management of retained habitats, the addition of appropriate planting and provision of hedgehog highways, together with bird nesting and bat roosting opportunities in the scheme design.
21.1	Jonathan Morgan (Monmouthshire County Council)	Comment	This SPG should include the significance of designed or historical spaces. Certain historically significant spaces or views particularly those are noted in a designation we would look to protect this space from development.	Comment noted and it is appropriate to include this element in the SPG to raise awareness.	Add another point in Table 2 (Key Matters to be Considered When Undertaking a Site Appraisal) i.e. Designed or historically significant spaces.

					<p>Add to Box 3... The Council's adopted Conservation Area Appraisals (CCAs) have identified certain views, spaces or gaps as significant in character, they often contain significant site lines from, or to historic buildings, or are part of a layout or approach to a complex of buildings or town. These could include former market squares, commons or medieval road which caused the town to develop around an open space at that location throughout its history. Planned layouts also include formal approaches to an historic house or group of buildings, which for instance would relate the coach house to the Inn or manor house nearby. These spaces are valuable in understanding how these sites worked and developed and are often a specific characteristic of designation in rural or planned conservation areas. Please note that we would look to protect certain historical significant spaces or views from development, especially those are noted in CCAs.</p>
22.1	Mark Davies (Monmouthshire County Council)	Comment	Highlighted some changes to Detailed Consideration D - Sustainable Transport/Access and Parking	Welcome suggested changes.	Make relevant changes accordingly.