

**Application Number:** DM/2023/01019

**Proposal:** Residential development (21 dwellings) together with associated landscaping, infrastructure and ancillary works

**Address:** Land north of Monmouth Road, Raglan, Monmouthshire

**Applicant:** Edenstone Homes

**Plans:** Other 2284-100-1-F - SHEET 1, Other 2284-100-2-D F - SHEET 2, Tree Protection Plan TREE PROTECTION PLAN - , Garage Plans GARAGES - 160 - , Garage Plans GARAGES - 161 - , Garage Plans GARAGES - 161-1 - , Elevations - Proposed HOUSES - 150 B - , Site Layout LAYOUTS - 100 - B, Site Layout LAYOUTS - 101 - A, Site Layout LAYOUTS - 102 - B, All Proposed Plans LAYOUTS - 103 - B, All Proposed Plans LAYOUTS - 104 - B, All Proposed Plans LAYOUTS - 105 - B, Parking Layout LAYOUTS - 106 - B, Site Layout LAYOUTS - 107 - B, Street Scene LAYOUTS - 108 - A, Lighting Plan / Information LIGHTING - V.4A, Location Plan 101 REV A - , Drainage edp8971\_d003-A - , Landscaping Plan EDP8971\_R001 - , Landscaping Plan EDP8971\_D003-A - , Landscaping Plan EDP8971\_D002 - , Landscaping Plan EDP8971\_D001 - , Drainage 2284-105-1-A - , Drainage 2284-105-2-A - , Drainage 2284 - , Technical Details 216214\_AT\_A03 REV E - Tracking, Technical Details 216214\_AT\_A01 REV E - Tracking, Technical Details 216214\_AT-A02 REV E - Tracking, Technical Details 216214\_A01 REV E - Tracking, Green Infrastructure Framework Plan 110\_ - B, All Proposed Plans 155 - B, All Proposed Plans 160 - B, All Proposed Plans 161 - B, All Proposed Plans 162 - , All Proposed Plans 163 - , All Proposed Plans 164 - , All Proposed Plans 165 - , All Proposed Plans 166 - , All Proposed Plans 167 - , All Proposed Plans 168 - , All Proposed Plans 169 - , Other 175 – Pond, Flood Consequences Assessment and Drainage Strategy, prepared by Edenstone Group, dated September 2024, Ecological Impact Assessment Report prepared by Wildwood Ecology, dated 21/06/2023

**RECOMMENDATION: Approve subject to s106 agreement**

Case Officer: Ms Kate Bingham  
Date Valid: 20.07.2023

**This application is presented to Planning Committee due to the number of objections received**

**1.0 APPLICATION DETAILS**

1.1 Site Description

The application site relates to a 1ha area of agricultural land located within the village of Raglan. The site is rough pasture that is not currently actively grazed and is instead subject to a regular management and maintenance regime. It is bounded on three sides by existing housing and on the southern side by a native boundary hedge alongside Monmouth Road, the primary road into Raglan from the A40. Land to the south of this road remains undeveloped.

The site is privately owned and is entirely enclosed along its boundaries with a vehicular and pedestrian security gate at its entrance from Monmouth Road. There are no public rights of way that either cross the site or connect to its boundaries.

Topographically, the site slopes down by approximately 3m from its northern boundary to the south. Beyond its northern boundary, the site slopes steeply downwards to the four detached houses on the southern side of Old Monmouth Road with a retaining wall in place. These properties are orientated so that their gardens back onto the application site with the houses themselves further to the north and fronting Old Monmouth Road.

The site's western boundary is formed of three components. The north-eastern part is a narrow, fenced paddock which runs approximately a third of the length of the site's western boundary. To the south of this is Hawthorn House, a detached property constructed in accordance with a planning permission from 2009. Further to the south of this, and immediately south-west of the site, is a recently constructed property known as Nelson House (ref. DC/2018/00176).

The site is not subject to any statutory or non-statutory ecological designations with the nearest statutory site (the Llangovan Church Site of Special Scientific Interest) being 4.7km away and the nearest non-statutory site within 1km.

There are no Scheduled Ancient Monuments or Listed Buildings within the site boundary. A cluster of listed buildings are located to the west of the site at Castle Street whilst Raglan Castle, which is located approximately 350m north of the site is Grade I listed, a designated Scheduled Ancient Monument, and a Registered Park and Garden.

The site is within Flood Zone A (Considered to be at Little or No Risk of Fluvial or Coastal/Tidal Flooding) in the current Development Advice Maps and Flood Zone 1 in the emerging Flood Map for Planning. Neither map identifies the site as being at risk of surface water flooding.

The site is not subject to any statutory landscape designations.

The site is within Raglan's settlement boundary. The LDP identifies Raglan as a Rural Secondary Settlement, a tier in the settlement hierarchy which is to accommodate a proportionate amount of new housing. It is also within the Raglan Conservation Area. Reflecting its contribution to the Conservation Area, the application site is designated as an Area of Amenity Importance in the LDP. This does not preclude the development of the site but sets out five criteria that must be satisfied for development to be considered acceptable.

The site is also located within the Nutrient Sensitive Catchment Area of the River Usk Special Area of Conservation (SAC).

## 1.2 Value Added

Following advice from both internal and external consultees, the applicants have worked closely with Planning Officers and relevant consultees to address concerns raised and to that end, a revised package of plans and documentation was submitted on 7th October 2024. Compared to the scheme that was originally submitted, the key changes to the proposals are as follows:

- The reduction in the number of homes proposed from 23 to 21;
- Changes to a number of house types as well as the mix and their locations across the site;
- The formation of a publicly accessible viewing point at the northern edge of the site facilitating public views from the site to the Castle; and
- A revised approach to green infrastructure provision across the site incorporating additional tree planting and landscaping.

## 1.3 Proposal Description

This is a full planning application for 21 dwelling with a mix of house types, tenures and sizes, alongside a package of green and blue infrastructure, appropriate buffers to the site's boundaries, the retention of an undeveloped visual corridor through the site, internal roads, and informal and formal open space that will be usable by the general public.

A total of eight different house types are proposed to be delivered across the site with a combination of one-bedroom flats and two/ three and four-bedroom houses. The proposed houses will be a mix of two and two and a half storeys in height. In accordance with Policy S4 of the LDP, seven of the 21 homes (equating to 35%) are to be affordable. These will be a mix of affordable rent and shared ownership.

Access into the site would not be controlled and therefore public open space within the site will be accessible to the public beyond residents of the application site. The public open space is proposed at the northern end of the site to allow to views of Raglan Castle. An attenuation pond is located in the south-western corner of the site. It is anticipated that this will permanently be wet.

A new vehicular access into the site is to be delivered midway along the length of the site's frontage with Monmouth Road. This access is proposed to be in the form of a new priority junction. To provide the access into the site and associated footway improvements along the northern edge of Monmouth Road, will require the removal of 17m of hedgerow but this is proposed to be compensated with the planting of 293m of new hedgerow and retention of 66m of hedgerow.

## 2.0 RELEVANT PLANNING HISTORY (if any)

Reference Number	Description	Decision	Decision Date
DC/2006/00855	The construction of a new retirement community comprising a range of housing units plus a communal block within an enhanced open landscape setting as follows: 2 no. four bed houses, 8 no. 2 bed cottages, 8 no. two bed flats, 12 no. one bed flats, 14 no. bedrooms, 4000 sq ft of central communal facilities including a gymnasium, a library and a restaurant	Refused	31.10.2007

## 3.0 LOCAL DEVELOPMENT PLAN POLICIES

### Strategic Policies

S1 LDP The Spatial Distribution of New Housing Provision  
 S12 LDP Efficient Resource Use and Flood Risk  
 S13 LDP Landscape, Green Infrastructure and the Natural Environment  
 S16 LDP Transport  
 S17 LDP Place Making and Design

### Development Management Policies

H2 LDP Residential Development in Main Villages  
 EP1 LDP Amenity and Environmental Protection  
 EP5 LDP Foul Sewage Disposal  
 DES1 LDP General Design Considerations  
 DES2 LDP Areas of Amenity Importance  
 GI1 LDP Green Infrastructure  
 NE1 LDP Nature Conservation and Development

### Supplementary Planning Guidance

Affordable Housing SPG July 2019:

<https://www.monmouthshire.gov.uk/app/uploads/2019/09/Final-Adopted-SPG-July-2019.pdf>

Infill Development SPG November 2019:

<https://www.monmouthshire.gov.uk/app/uploads/2020/02/Appendix-2-Infill-Development-SPG-Latest-Version-for-Final-Adoption-2020-Dave-adjustments-00000002.pdf>

Green Infrastructure April 2015:

<http://www.monmouthshire.gov.uk/app/uploads/2015/07/GI-April-2015.pdf>

Domestic Garages SPG (January 2013):

<http://www.monmouthshire.gov.uk/app/uploads/2015/07/Domestic-Garage-SPG-Jan-2013.pdf>

Monmouthshire Parking Standards (January 2013)

<http://www.monmouthshire.gov.uk/app/uploads/2015/07/Mon-CC-Parking-Standards-SPG-Jan-2013.pdf>

### **Conservation Area Appraisal**

Raglan Conservation Area Appraisal (March 2016):

<http://www.monmouthshire.gov.uk/planning-policy/supplementary-planning-guidance/raglan-conservation-area-appraisal>

The Raglan Conservation Area Appraisal and Management Proposals state that:

At the entrance driveway to Hill House there are well defined views north to the castle. The field east of Hill House provides further expansive views north to the castle and Castle Farm. Uninterrupted views between village and castle are rare and therefore these now form a significant positive characteristic of this part of the Conservation Area. The field, presently rough grassland grazed by cattle, is an important green open space within the village. The open nature of this open area affords the uninterrupted views that reinforce the historic connection between the castle and village.

## **4.0 NATIONAL PLANNING POLICY**

### **Future Wales - the national plan 2040**

Future Wales is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. Future Wales - the national plan 2040 is the national development framework and it is the highest tier plan, setting the direction for development in Wales to 2040. It is a framework which will be built on by Strategic Development Plans at a regional level and Local Development Plans. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.

### **Planning Policy Wales (PPW) Edition 12**

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 of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.

### **Welsh Development Quality Requirements (WDQR) 2021 (Appendix A & B space requirements)**

Quality requirements for affordable housing.

## 5.0 REPRESENTATIONS

**Raglan Community Council** – Objection on the following grounds:

The Community Council has expressed a number concerns and wish to offer the following objections and noting the other correspondence the Planning Authority has received relating to this application.

This site has previously seen a planning application to develop the site for a new retirement community, comprising of a range of housing units (six separate blocks) plus a communal/amenity/housing block (a single large, long building), all of one and a half to two storeys in height, with two-storey corner towers and containing 44 separate dwellings. That application was refused planning permission in November 2007 (DC/2006/00855). The buildings were set out in two lines with an open space as a north-south corridor through the middle of the site. The reasons for refusal were various, however, they included several aspects related to the historic environment namely:

The proposed development would harm the beneficial contribution that the Site makes to the Raglan Conservation Area. This would have impact along with interruption of the views of and from Raglan Castle.

### Local Development Plan (LDP):

In terms of this proposed application the applicant would appear to have failed to show that the proposed development is necessary. Currently MCC is progressing with its RLDP review and all indications are that dwelling projections will be significantly lower than existing.

The housing need may be as low as half the current annual targets. It would appear that there is no overriding requirement or need for a proposed development of this scale in Raglan village itself. It's clear that if there was even a need for housing this would not be the appropriate site to deliver such a development which would mean it would be an unsustainable form of development.

Planning Policy Wales (PPW) offers advice that Planning Authorities (PAs) should consider the capacity of existing and potential infrastructure, including other utilities and social infrastructure such as schools and hospitals, along with the GP surgery. It's clear from all the current publicity relating to education and health, the village and the community would be unable to absorb further development. Therefore, concern must be expressed that at this stage the infrastructure of Raglan Village will find it difficult to manage the size of the development of this proposed site.

Within the current LDP adopted on 27 February 2014, Section 2.4 states "Under the Planning and Compulsory Purchase Act 2004, local Planning Authorities are required to undertake their functions with a view to contributing to the achievement of sustainable development". A development of this size and scale would have a negative impact on the sustainability of Raglan and the wider community.

Considering all the facts at this stage, it is difficult to see how the Planning Authority can consider approving this proposed application, under section 2.5 of the LDP. The LDP states the Council must have regard to National Planning Policies. The WGs National Land use Planning policies are set out in Planning Policy Wales (PPW) and circulars, supplemented by Technical Advice Notes (TANs).

As you are aware the Cabinet Minister has issued a disapplication of paragraph 6.2 of TAN 1. The Planning Authority adopted the recommendation from the Wales Spatial Plan (WSP) which was originally adopted by the National Assembly in November 2004 and updated in July 2008. The WSP provides a framework for the future spatial development of Wales and integrates the spatial aspects of national strategies including social inclusion, economic development, health, transport and environment policy, and is a material consideration in the preparation of the LDP.

Set out in the Planning Inspectors Report relating to 2014 LDP, the inspector indicates;

“Because of its good level of services and facilities Raglan is classified as one of the four Rural Secondary Settlements in the County; it is amongst the first-tier villages and ranked second overall. Although there is little opportunity for employment in the village and newcomers will be likely to have to commute to jobs, additional housing will provide some extra support for facilities”.

The five guiding themes of the WSP indicate that it should Build Sustainable Communities, promote a Sustainable Economy, Valuing Our Environment, Achieving Sustainable Accessibility and Respecting Distinctiveness.

The scale and size of this development does not provide a sustainable community, nor supports a sustainable economy as owners within this proposed development will be commuting out of the area.

Therefore, due to the size, scale and mass it will not enhance the environment, and it will detract from the uniqueness of Raglan, and with that in mind, members of Raglan Community Council would object to this application.

#### School:

The education authority received Planning consent under the Planning Application DC/2014/00201. The consent was for the erection of a primary school in the village for 210 pupils. It's the Community Council's understanding the school is operating at or over capacity. It would appear from information available that Raglan school, will have difficulty coping with the development of a further 21 dwellings along with the development that is under construction on Chepstow Road in Raglan. With no opportunity to expand on the current site the only solution will be busing children to neighbouring schools resulting in unsustainable traffic movements. Currently due to the budget restraints the County Council are under this wouldn't be an option.

The development as a whole would appear to be in conflict with the LDP in many areas. Planning law requires that the application be determined in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires inclusion in the current LDP. It would appear that there are no material considerations which could outweigh the conflicts with the current LDP and the Planning Authority are urged to refuse this application.

#### Public Access:

Currently the site is poorly connected to Raglan village for pedestrians. The current footway along Monmouth Road is of sub-standard width and poorly surfaced forcing users to walk in the carriageway itself. The development does not propose to address these deficiencies. The current proposal does not indicate any provision of a pedestrian link that could be fully funded or delivered. The situation is even worse along Station Road which has no pedestrian footpaths and this would be one of the main access points to the school.

The village could be said is poorly serviced by public transport. Bus frequency is limited to once every two hours and there are no evening services operating. On the current drive for people to use public transport for work and pleasure, it isn't possible to work in a neighbouring town or community on a full-time basis due to the current bus service.

Raglan is a very modest small rural community and has limited employment opportunities and no new proposed allocations for employment. The Planning Authority will need to take all these factors into account and this would mean that prospective owners of dwellings of this proposed development will be car dependent leading to unsustainable traffic movements. The community has seen a number of accidents in the surrounding road network.

#### Conservation Area:

The Raglan Conservation Area was designated in 1982. Raglan Conservation Areas is one of 31 designated Conservation Areas in Monmouthshire. The Raglan Conservation Area was established in the Monmouthshire County Council policy adopted in 2016 relating to the Conservation Area Appraisals and adopted as Supplementary Planning Guidance (SPG) and as such are part of a suite of guidance to complement the LDP to ensure suitable and sustainable development within MCC.

These documents support the preservation and enhancement of local identity and culture. It's the Community Council's understanding the Planning (Listed Building and Conservation Areas) Act 1990 (S.69) imposes a duty on Local Authorities to review their areas "from time to time" and to consider whether further designation of Conservation Areas is called for. It's the Community Councils understanding that no further amendments have been made through the consultation process. The Community Council have noted the observation CADW has made in its latest correspondence. CADW indicated that they have significant concerns about the impact on the scheduled monuments and registered historic park and gardens. However, we consider that if mitigating measures were undertaken, our concerns about the impact would be reduced. It's difficult to understand what mitigating measures could be put in place when this site has been refused consent in November 2007 (DC/2006/00855).

**In conclusion the Community Council formally objects to this proposed Planning Application. It can be considered the proposed application is in conflict with a number of policies and advice notes in Monmouthshire County Council LDP that was adopted in February 2014.**

**Welsh Government Land Quality Advice Service** - I can confirm the Department has no comments to offer in respect of the application and BMV agricultural land policy (PPW para 3.58 and 3.59) on which it is for the determining authority to take a view. The Department does not hold any detailed ALC field survey information for the site. The Predictive ALC Map notes the site (approx. 1.0ha) as Grade 2 and Urban. Due to the small size of the site, a detailed ALC survey would not be practical and is not recommended. The site is allocated as an Area of Amenity Importance (Policy DES2) under the adopted Monmouthshire LDP.

**Natural Resources Wales (NRW)** - No objection subject to documents being referred to in the decision notice.

Nutrient Sensitive River Usk and Foul Drainage - We note the application site is within the catchment of the River Usk Special Area of Conservation (SAC). As you are aware, on the 21 January 2021, we published an evidence package In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We refer you to our Advice and the information set out in the section titled '*What does this mean for development proposals involving connection to public wastewater treatment works*'.

Your Authority will need to take the above into account in your determination of whether the development is likely to have an adverse effect on the SAC.

Flood Consequence Assessment and Drainage Strategy - We note the updated Flood Consequences Assessment and Drainage Strategy, prepared by Edenstone Group, dated September 2024 which includes Engineering Layout Sheet 1, drawing number 100-1, revision F and Engineering Layout Sheet 2, drawing number 100-2, revision D. The document should be included in the approved plans and documents condition on the decision notice.

European Protected Species - We also continue to advise that based on the information submitted to date, the Ecological Impact Assessment Report prepared by Wildwood Ecology, dated

21/06/2023, should be included in the approved plans and documents condition on the decision notice.

**Dwr Cymru – Welsh Water (DCWW)** - We have reviewed the information submitted as part of this application with particular focus on drawing reference 100-1 F and and 100-2 D which shows the proposed foul and surface water drainage layout and off-site destination. We note the connection of surface water to the watercourse and foul water to an existing public sewer to which we offer no objection in principle.

Furthermore, the site lies within the catchment of Raglan WwTW which ultimately discharges to a Special Area of Conservation (SAC). We would advise that this WwTW it has a phosphorus consent limit of 1 mg/l and is currently compliant with this consent limit.

However, the WwTW is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation. Accordingly, we would advise there is currently a lack of hydraulic capacity in the public sewerage system and downstream WwTW to accommodate foul water flows from the development subject of this application.

Notwithstanding this, in line with the environmental regulator's National Environment Programme, we are required to deliver a scheme at the WwTW to ensure 95% quartile compliance with our FPF performance and offer a condition aligning to the date of delivery as recommended below. Notwithstanding the above, if you are minded to grant planning permission we request that the following Conditions and Advisory Notes are included within any subsequent consent.

1. No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

2. No buildings on the application site shall be brought into use earlier than 31/12/2027, unless the upgrading of the public sewerage system, into which the development shall drain has been completed and written confirmation of this has been issued to the Local Planning Authority by Dwr Cymru Welsh Water.

Reason: To prevent further hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

**Cadw** - No objection subject to condition.

Amended plans for this application, reducing the number of dwellings to 21, with a revised layout have been submitted in support of this application. The revised layout still includes the essential elements of the original design that were introduced to mitigate the impact of the proposed development on the setting of Raglan Castle, including the central avenue providing views to the castle; planting to soften the buildings in views from the castle and the provision of a seating area with interpretation panels overlooking the castle. As such the impact of the proposed development on the setting of the castle will be similar to the original layout as assessed by EDP. As such, Cadw does not object to the granting of planning consent to this application, subject to a condition (as worded in our previous letter) ensuring that the proposed compensatory works are carried out, is attached.

**Heneb (formerly GGAT)** - No objection subject to condition.

We have consulted the information in the Historic Environment Record (HER) and note the submission of a desk-based assessment by Archaeology Wales (Report no. 2150, dated January 2023). We also note Cadw s pre-application comments on the potential impact on Raglan Castle Scheduled Monument (Cadw ref. MM005) and Raglan Castle Registered Historic Park and Garden (Cadw ref. PGW (Gt) 42 (MON)). As a result a Heritage Assessment (EDP Report no. edp8120-r001d, dated July 2023) and Rapid Archaeological Appraisal (Archaeology Wales Report no. 2223, dated August 2023) have also been submitted.



With regards to non-designated, below-ground archaeological remains, the documents have identified two former field boundaries as well as a moderate potential for further unrecorded activity spanning the prehistoric to the Postmedieval periods. As a result, an archaeological watching brief on all groundworks is recommended.

We concur and it is our recommendation that a condition requiring the applicant to submit a detailed written scheme of investigation for a programme of archaeological work to protect the archaeological resource should be attached to any consent granted by your Members.

**MCC Landscape/Green Infrastructure** – No objections subject to conditions and S106 contributions:

Detailed landscape/planting plan (also implementation and management)

Green Infrastructure Management Plan

Details of Information Board

Samples of roof tiles.

**MCC Biodiversity** – No objection subject to planning conditions.

**MCC Heritage** – A number of revisions have been made to the plans to address the concerns over layout and orientation of the buildings whilst maintaining key sightlines to the castle. These are welcomed and improve the layout of the site.

However, there remains some observations in relation to the proposed plans, some identified earlier in the pre- application response and initial consultation

**Materials** - As previously noted all properties should have natural slate roofs, there is a statement on materials plan 102B that roofs are to be grey. These should be of natural slate. It was also requested that surfaces were shared and of a higher quality material. The plans show tarmac roads and pavements, there at least should be a differentiation between the road surface and the pavements ideally with permeable paving to the pavements. The additional tree planting is welcomed.

**Design** - it was previously requested to simplify the fenestration to the windows of the properties. In addition, plots 3 and 20 should have a more active side frontage as they face both the main road and internal spine road. The use of a double height bay to the larger and a ground floor bay to the smaller (sa) unit would be required.

**Boundary treatments.** I can see that attempts have been made to ensure some visible boundary treatments are finished in stone, however this should also be extended to the front of the site with the access to the side of properties 1 and 21, to the rear of properties 20, and 3 and the rear courtyard of plots 9-13 and the rear of 14-15 so that the parking area is not bounded by close boarded fences. The boundary to east of plot 16 and the rear of 18/19 should also be stone.

Samples of materials such as Natural slate, Stone for boundary walls and cladding  
Permeable paving should be agreed via a condition.

It is also recommended that permitted development rights are removed in relation to enclosures, extensions and outbuildings.

**MCC Housing** - No objections.

The proposal is for 5 of the homes to be provided as social rent and 2 to be provided as shared ownership. At this stage the preference is for the homes to be neutral tenure, where tenure of housing is not predetermined but can vary according to needs, means and preferences of households to whom it is offered. Consultation would be carried out with the local community to understand the mix of tenure required. However, if some of the homes are to be provided as 'Low Cost Home Ownership' we would require these to be shared equity rather than shared ownership.

**MCC Highways** – No objections. Following review of the site layout drawing '100 B' and Engineering Layout '2284 100-1 Rev. F' the Highway Authority are satisfied that the concerns

previously raised have been addressed and therefore are now in a position to remove our initial objection and offer no objection the application subject to the following conditions being applied to any grant of planning approval or included in a Section 106 Agreement.

The site is located within reasonable walking distance, 800 metres of local amenities, shops, doctors, primary school etc. A footway is located on the northern side of Monmouth Road, directly along the full site frontage, albeit sub-standard in width.

Monmouth Road forms part of the National Cycle Network (NCN) and is recorded as Route No. 423. The application proposes no other specific provision or improvements to the local cycle network to encourage or promote cycling, however it is acknowledged that the application site has direct access to the NCN.

Bus stops are located on Monmouth Road approximately 230 metres from the centre of the proposed development. Unfortunately, based on the proposals submitted, the modal split for the proposed development is likely to include minimal, if any, bus use, because of the low frequency levels of buses. Services currently operate once every two hours for both the 60 and 68 bus routes. The nearest rail station is located in Abergavenny, 14Km, therefore, rail travel is likely to be dependent on car travel, due to poor connecting bus provision.

The access is proposed directly onto the adjacent Monmouth Road in the form of a priority T-junction of standard width 5.5m. The proposed access is located within the existing 20mph speed limit. Footways are proposed on both sides of the junction which connect to the existing footway on Monmouth Road.

The general layout is considered acceptable with the provision of a 5.5m wide access road together with a turning head and one 2m wide footway on the western side of the carriageway, all of which have been designed to adoption standards. A swept path analysis has been submitted as part of the TS which demonstrates that refuse vehicles can serve the site and turn appropriately in the proposed turning head. In addition to the main spine road there are a series of private shared drives providing access and parking to individual dwellings properties.

Access designed to serve no more than 5 dwellings is acceptable in accordance with current design standards. Only the main spine road and turning head would be considered for adoption as public highway and the shared accesses for dwellings would remain private.

As stated above, access for refuse vehicles can be achieved from the main spine road. It should be noted that refuse collection is based on kerb side collection therefore refuse is to be taken to the main spine road for collection.

Careful consideration should be given to the proposed use of highway construction materials as any material which is over and above conventional materials a commuted sum will be applicable for its future maintenance.

The TS and submitted layout drawings clearly demonstrate that the car parking provision proposed for each dwelling is in accordance with the Monmouthshire Parking Standards. Where garage parking is proposed single and double garages are shown with dimensions in accordance with the Monmouthshire Standards for garages, therefore are acceptable.

As part of the TS an analysis of the existing local highway network has been carried out and it has been demonstrated that the peak periods on the highway network are between 08:00 - 09:00 in the AM and 17:00 - 18:00 in the PM. The TS has assessed the effect of the traffic impact from the proposed development of 23 residential dwellings on the local highway network.

The projected trip rates from the proposed development have been obtained from the TRICS database which is the recognised database for trip rate information. The projected trip rates in the AM peak period are projected at 11 two-way trips and 10 two-way trips in the PM peak period.

Having considered the submitted data it is accepted that the level of traffic proposed from the development will have no adverse impact on the safety and capacity on the local network.

Considering the above, there are no highway grounds to sustain an objection to the development, in principle.

**MCC Active Travel** - According to Planning Policy Wales 12 and the Active Travel Act guidance, access priorities should reflect the hierarchy of sustainable transport. This relates both to provision within the site and to connections between the site and nearby services, facilities and active travel networks. Active travel provision should be coherent, direct, safe, comfortable and attractive. Specific guidance on designing for active travel can be found in the Active Travel Act guidance.

It is noted that the speed limit along Monmouth Rd has been 20mph prior to the Transport Statements speed survey, which showed the average speed is above 30mph and the 85th centile above 36mph. Localised traffic calming could be considered in the area.

The site is conveniently located within a village, within walking/cycling distance to primary education, retail and the post office, and small employment sites. Active travel access to local bus services is also good. NCN 423 runs directly past the site. Raglan High Street is narrow and frequently congested, even though a main road alternative runs parallel to it (the A40), so the encouragement and enhancement of the active travel offer in the village should be considered important to the sustainability and wellbeing of the community.

The width of the junction connecting the development to Monmouth Road should be considered in the context of the sustainable transport hierarchy and active travel standards, and the design should reflect the current actual vehicle speeds.

Tightening the junction splay, which may be possible now that Monmouth Road is now 20mph from the Castle Rd junction and onwards into Raglan, will enhance the active travel offer by reducing inconvenient deviation of the pedestrian desire line and encourage drivers to slow and observe when turning. Pedestrians travelling along Monmouth Road past the development should not be drawn too far into the development. Given the reduced speed limit on Monmouth Road, larger vehicles turning into the development should be expected to complete their turn by turning wide, rather than needing a wider junction splay that pushes the pedestrian crossing into the development.

The pavement provision around the site should be 2m minimum to meet current guidance. All paths should be well lit for personal safety and security purposes. Where possible, acute angles in pavements and cycle routes would ideally be blunted or curved while maintaining minimum widths to accommodate movement and enhance attractiveness and longevity of active travel infrastructure whilst avoiding the creation of pits, puddles and balding of grass at tight corners. The pavement to the village centre crosses a single side road Castle Street, which could benefit from mouth narrowing and pedestrian priority.

The production of an outline plan for preventing transgression of active travel space by motor vehicles i.e. bollards or plants to prevent parking on pavements, would be welcomed to further promote active travel from the site.

It is to be noted that safe cycle parking provision within housing units should be made to meet standards set out in Active Travel guidance, this states 1 space per bedroom. Secure and ideally covered Cycle parking within Raglan village centre is currently limited and would benefit from future investment.

We would seek assurance that the construction plan secures the needs and safety of walkers and cyclists in temporary traffic management arrangements during construction.

**MCC Public Rights of Way** - No objection. Confirm that there is no recorded public right of way through the site to the well. I have examined historic mapping and there is no evidence of any path

running to/from the well from the south. It appears that there has been a highway immediately north of the well for over 100 years, and I believe this would have been used to access the well.

**MCC SAB** - No objections.

The application has demonstrated a means of surface water discharge (rainwater harvesting, infiltration, watercourse, surface water sewer or combined sewer). This will be subject to a S50 approval for installation of the new surface water pipe under the Monmouth Road to the Barton Brook. The site will be subject to SAB so please attach the SAB informative and draw the applicant's attention to it. We would recommend they undertake a pre-app with the SAB to confirm the details of the construction and layout. There are a few minor tweaks that will be required that may impact the layout by minor amounts.

**MCC Lead Local Flood Authority** - No objection.

Flood risk maps provided by Natural Resources Wales indicate the site to be at no risk of Surface Water Flooding.

Our database of previous flood events does not record any flood events in close proximity to the site.

Our database of drainage and flood assets does not record any drainage or flood assets in close proximity to the site.

We therefore have no objection on flood risk ground.

**MCC Education** - We are unable to claim against the affordable housing so have just looked at the 14 dwellings which may generate 4 secondary age pupils according to the formula.

The rate we have provided during the RLDP assessment is £29,046 so total would be £116,184

This is a cautious approach which we can review at the appropriate time, but as we will be claiming for some of the RLDP sites it seems right to be consistent at this stage

**SEWBRc Search Results** - Bats, otters, reptiles and dormice recorded within the vicinity of the site.

## 5.2 Neighbour Notification

19 representations have been received objecting to the proposed development on the following grounds. These have been divided into broad categories for ease of reference:

### **Principle of development**

- Planning on this site has been applied for and rejected on numerous occasions previously, and nothing has changed.
- This site has been listed in the Monmouthshire Development Plan as an Area of Amenity Importance in the Conservation Area.
- It is also an important green area for wildlife and, as viewed from Raglan Castle is a beautiful vista.
- Raglan is a pleasant place to live and it attracts incomers but the school is already full and the Medical Facilities are already stretched.
- Raglan has no industries for employing extra people.
- Raglan has no public transport so these extra houses will mean that the people will have to use their cars to get to work which conflicts with Planning Policy Wales. This was one of the reasons given by the Inspector when rejecting the application by Richborough Estates the other side of the road to this site.
- The Council already own ground in Chepstow Rd. Raglan which has been passed for development for 45 homes which could accommodate any local needs.
- The proposed development is outside the development boundary of the village, as identified in the Local Development Plan.
- It is important that a significant development on a sensitive greenfield site such as this be subject to the rigours of the Local Development Plan process, rather than looking to circumvent the assessment and wider public consultation exercise that this process provides.

- Previous Precedent: MCC has recently approved 45 new dwellings in Raglan. Should this application be approved, the combined number of new houses approved will approach the number recently applied for by Richborough Estates (Application No: DM/2018/01050) directly across the road from this new proposed development. The Welsh Government intervened to reject the Richborough Estates development as it did not meet a number of its development policies (particularly with regard to the LDP strategy to justify this scale of growth, connection to services and employment opportunities, distribution of housing growth, poor performance in relation to Transport hierarchy and sustainable development). The parallels with this application and the precedent of the Richborough Estates ruling are clear and should carry considerable weight when considering this application and should lead to it being rejected.
- The infrastructure (schools, local industry, transport links and access routes) supporting Raglan are already strained.
- The infant and junior school is already oversubscribed, with some Raglan 5 to 11 yr old children and all 11 to 18 yr old children having to travel outside the village to receive education.
- All new developments should surely be on Brownfield locations.
- This is a commercial project that will benefit very few, rather than those who really need it.
- It is our understanding that the proposed site is subject to a restrictive covenant (the Ty Hir Covenant) and is classified as amenity space and agricultural land. Were the restrictive covenant to be lifted to enable the development of the proposed site, this would also impact on the surrounding parcels of land that are currently subject to the same restrictive covenant.
- Limited available sewage works capacity.
- Limited telephone exchange capacity.
- Concerned that there are not the affordable houses that first time buyers or the young families in the locality need, rather the majority will be expensive executive homes. The social housing offer appears to be included to ensure the overall development is passed.
- The Planning authority have spent significant time and resources in preparing the LDP. This application is in contradiction of the LDP. If developers are allowed to ignore or ride roughshod over the LDP, then what is the point of the LDP or even the planning authority.
- I was unable to retain a timber fence along a new boundary line adjacent to the application site as I was informed by MCC that it constitutes development in an area of amenity importance which would be contrary to the Council's planning policies as it represents an unacceptable erosion of an important area of amenity open space within the Raglan Conservation Area.
- For many years, MCC denied permission for me to use my adjacent piece of land as a garden, on the basis that I was not able to change the use from agricultural use to a residential use.

### **Biodiversity**

- The meadow in question is a greenfield site on the edge of a rural village. It provides a valuable habitat for biodiversity in the area, including bats, owls, buzzards and newts.
- The field perimeter and hedge adjacent to Monmouth Road is home to a number of amphibians during the wetter months, these amphibians then migrate to take refuge in the field during the drier months.
- This proposal will have a negative adverse impact on the local wildlife. Living adjacent to the field, I have often spotted several different species of birds and animals there. Cutting down the row of trees along Monmouth Road could affect this habitat.
- Since 10 types of bat have been detected on this site, how many bat boxes will be placed on the site and where will they be placed, since the new homes will interrupt their flight path?

### **Historic Environment**

- The historic sightline has been deemed so important that a number of previous planning decisions have been made as result; notably heights of houses to keep them below the ridgeline of the field in question and positioning of houses to minimise their visible impact

from the Castle. Development of this site as proposed would mean that this last historically significant sightline would be lost forever.

- The proposed development would severely impact the appearance of Raglan Conservation Area. Why have a conservation area and then allow inappropriate major developments in that area.
- It would set a precedent for major developments on green field sites in conservation areas, both in Raglan and elsewhere in Monmouthshire.
- It is a matter of public record that several previous proposed developments on this site have been rejected by MCC Planning, primarily due to the significant impact on the Raglan Conservation Area and visual amenity/green space as viewed from/to the Castle.
- The view from Monmouth Road to the Castle could easily be restored through appropriate hedge cutting.
- We cannot see how the green corridor is going to work when screening trees will be planted.
- This field has also been stated to be of historical importance dating back to the English Civil War and is said to have had links with the castle. This also needs to be addressed fully.
- Tourists will have to go into the new estate to find the viewing bench. Where will they park. How will this be a positive historical experience when surrounded by modern houses? Historical places should be kept safe for this future. Why build on this bit of history.
- The seat in the plan is situated to view the castle but the line of sight to the castle is over private ground. There is a condition in the deeds of the housing of the properties (off Old Monmouth Road) to plant a beech hedge/ tree as a border between the field and their properties. At the moment the beech trees are a hedge, but they are fairly quick growers (for privacy) and can be grown to the height of up to 100 feet. So can conifers. It is at the discretion of private owners to grow their trees directly in front of the seat, there being no preserved view. The development company cannot therefore promise a long-term view of the castle from that point.

### **Transport / Access**

- The access to this site is very dangerous.
- The increased traffic, because of this development and the position of the intersection, will inevitably result in a potentially serious accident.
- The requirement for most people to travel by motor vehicle for work or education, at peak times (0830 to 0930hrs, 1200 to 1300hrs and 1530 to 1800hrs) means the Raglan High Street will be further congested.
- It should be noted that the Junction between Monmouth Road and the A40 dual carriageway has, in recent months, seen some major accidents.
- If you presume that each household has two cars that is 46 cars more through the village in a day. These residents are likely to use this route at least twice a day. Despite the recent lowering of speed limits, this road is already dangerous.
- Many local pedestrians also use this road to access the village facilities, so increased traffic could impact on their safety.
- Parked car on Old Monmouth Road was written off while parked.
- Before we add more housing there should really be a proper review of the existing road junction with the A40 and safety should be paramount.

### **Surface Water Drainage**

- It is noted that there are a number of water courses proposed and several ponds. The ponds at the northern end of the proposed development are situated near to existing gardens that are approximately 2 metres below the pond location. There does not appear to be any contingency to deal with the potential overflow from the ponds. I would assume that the intention of the ponds is to be used to disperse the water over the ground. The proposed development area has numerous land drains that all disperse into the local system through the existing well and pond on Old Monmouth Road. Additional water may cause the gardens on Old Monmouth Road to flood.

- Who is going to maintain the attenuation pond? With global warming and increased rainfall, is this likely to overflow and run onto the road and onto local driveways? The proposed site of this pond always becomes very flooded in wet weather.
- Who will maintain the swales? Swales need to be mown regularly in order to work effectively.

### **Visual Impact**

- The development will have an adverse impact on the village form and character and surrounding area.
- The design does not appear to be to scale. I have walked the boundary and cannot envisage how the implied size of the houses and gardens and garages and trees and ponds and driveways and viewing points can fit in this small field.
- The artist's interpretation of the positive green spaces - gardens, pond, green corridor appears very misleading. The actual area is much smaller than the design suggests. The street scene drawing makes the hedge on Monmouth Road appear to be at least twice its actual size.
- The development seems too large for the site that they are proposing to build upon. The proposal is to build 23 residential dwellings on this site of 2.47 acres. The nearby Barton Bridge Close/Rise was completed in the 1980s and that development has only 31 houses built upon a site of 5.58 acres.
- Overdevelopment within a rural village.
- The proposed site will be seen directly from all approaches to the village and from the castle and will look more like a crowded city street than a sympathetic development.
- The amenity space is important to local residents as it breaks up the extent of housing on the approach to the village.

### **Residential Amenity**

- Overpopulation on such a small site will impact upon me personally. This will definitely affect the natural light and view of the castle and the nearby mountains will be eradicated. This will also significantly affect the value of my property.

Two comments in support received:

- The castle is the only building of historical and architectural significance in the Conservation Area east of the Barton brook and Edenstone Homes have preserved this view and created a layout and house design sympathetic to the area.
- Along with many others I have suffered from draconian planning restrictions on the Conservation Area and believe these should now be abolished when the castle sight-line is preserved by a public highway.
- I would prefer the field kept as a sanctuary for trees that have recovered from ash dieback but acknowledge this is not practical so suggest the Edenstone application is the best we are likely to see.

Further comments received following re-consultation on revised drawings. Object on the following grounds:

- This re-consultation deadline feels a very tight turnaround time for people to review and respond to the new documents that were posted online on 7th October relating to this planning application. Would urge you to allow extra time to enable both individuals and local organizations, such as the community council, to be more thoroughly consulted on the amended plans.
- Despite the amendments, continue to object to the development. These concerns are still valid and should be considered by the Council when considering whether this development should be allowed.
- Amended plans for this proposed development do not address any of these fundamental points that were behind the previous planning rejections.
- The existing hedge should be grubbed up, a wider footway to current standards provided and a new hedge planted a couple of metres further back from the road.

- Increased emissions from traffic will be detrimental to the Raglan Healthy Footsteps Walk of which Monmouth Road is a part.

### 5.3 Other Representations

#### **Raglan Village Action Group - Objection (summary).**

##### 1. The proposal is contrary to LDP Policy DES2

The current application site was put forward as a Candidate housing site in the current LDP, but was rejected in October 2012, MCC determining that "there are compelling arguments regarding adverse historic impacts of the potential development of this site that make the proposal unacceptable."

The photographs in the Landscape and Visual Appraisal evidence the importance of the field to views from the Castle, and from Monmouth Road, Station Road and the well-used footpaths to the south.

The Edenstone application admits that the Finished Floor Levels (FFL) of the proposed houses are 50.70m AOD, i.e. the same height as the Ridge Heights of the properties immediately to the north which are 50.49 m AOD to 51.19m AOD, so the proposed Edenstone dwellings will be a towering 8.5m above the ridge heights of existing neighbouring properties, or c 16m above the thresholds of the neighbouring front doors. Again, it is impossible to argue that such dominant buildings on top of the highest part of the field will not adversely affect the quality of the open space. The topography of the field is clearly shown on Figure 2 in the Flood Consequences Assessment document.

##### 2. The proposal is contrary to Monmouthshire LDP Policy HE1

The proposal for 23 dwellings cannot possibly credibly be described as preserving or enhancing the character or appearance of the Conservation Area or not having a serious adverse effect on significant views into and out of the Conservation Area. The proposal is unarguably in conflict with Policy HE1.

##### 3 The proposal is contrary to Monmouthshire LDP Policy DES1

The proposal for 23 dwellings on the open space within the Conservation Area is clearly in contravention with DES1 e) as the estate shows zero respect for the natural view and panorama towards and from the castle. The proposed ridge heights towering 16m above the thresholds of the neighbouring properties immediately to the north will be highly damaging to the amenity of those neighbours.

#### Conclusion.

The Edenstone proposal for an estate of 23 dwellings on a designated open space which is important to the Conservation Area and the setting of Raglan Castle is unarguably in contravention of LDP Policies DES2, HE1 and DES1.

### 5.4 Local Member Representations

No comments received.

Please note all representations can be read in full on the Council s website:

<https://planningonline.monmouthshire.gov.uk/online-applications/?lang=EN>

## **6.0 EVALUATION**

### **6.1 Principle of Development**

6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan comprises of Future Wales: The National Plan 2040 (February 2021) and the Monmouthshire County Council Local Development Plan (February 2014).



6.2.2 Policy S1 (The Spatial Distribution of New Housing Provision) of the Local Development Plan (LDP) sets out the spatial strategy for the delivery of new housing across Monmouthshire, establishing what in essence is a settlement hierarchy. Raglan, alongside Penperlleni and Usk, is designated as a Rural Secondary Settlement. This is the third tier of the settlement hierarchy where the LDP states a modest and proportionate element of new housing is to be directed. Raglan is also identified as a Local Centre in Policy R6 (Retail Hierarchy), recognising the level of service provision within the settlement.

6.1.3 LDP Policy S2 (Housing Provision) quantifies Policy S1, setting an expectation that 75 homes would be delivered over the LDP plan period within Raglan, 14 through commitments and completions at the time of LDP adoption, 16 through windfall sites, and 45 at Land at Chepstow Road, a consented allocated site. The windfall expectations in the LDP are not limits but allowances, particularly now that the LDP has now passed its intended end date. As such, Raglan is considered an appropriate settlement for a level of new housing that is proportionate to its scale, accessibility, and range of available services.

6.1.4 The Replacement LDP, whilst at an early stage, continues to take this approach with the Preferred Strategy, through Emerging Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), proposing that the settlement remains a Secondary Settlement. In practical terms, this means that there continues to be an expectation that new homes will be delivered on newly allocated and windfall sites.

6.1.5 The application site is within Raglan's settlement boundary, reflecting that it is in essence a windfall site. Policy H2 (Development in Main Towns, Severnside Settlements and Rural Secondary Settlements) states that new residential development, whether in the form of conversion, redevelopment, subdivision, or new build residential development, will be permitted within settlement boundaries subject to other policies contained within the LDP.

6.1.6 In this case the application site is designated under LDP Policy DES2 as an Area of Amenity Importance. The primary purpose of this policy is to protect and, where possible, improve the built environment by retaining the overall amenity value of the existing stock of green space. Policy DES2 does not preclude development within Areas of Amenity Importance but states that development proposals on areas of amenity importance will only be permitted if there is no unacceptable adverse effect on any of the following:

- a) the visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces;

The Raglan Conservation Area appraisal (March 2016) makes particular reference to the site, Paragraph 7.3.12 noting the importance of the application site stating that:

"The field east of Hill House provides further expansive views north to the castle and Castle Farm (Fig.17). Uninterrupted views between village and castle are rare and therefore these now form a significant positive characteristic of this part of the conservation area. The field, presently rough grassland grazed by cattle, is an important green open space within the village. The open nature of this open area affords the uninterrupted views that reinforce the historic connection between the castle and village".

Based on the above, it is therefore considered that any development within this particular Area of Amenity Importance must retain the aforementioned uninterrupted views that connect the castle and the village.

As such, the proposed housing has been designed around a central corridor leading to a public open space. This will retain the openness of at least part of the site which will allow continued uninterrupted views between the castle and this part of the village. The effectiveness of the proposed layout design will be considered in detail later in this report.

- b) the relationship of the area of amenity importance to adjacent or linked areas of green infrastructure in terms of its contribution to the character of the locality and / or its ability to relieve the monotony of the built form;

All existing boundary hedges are to be retained except for the removal of a length along the southern boundary to allow access to the site. The scale and building line vary around the site with the existing houses on Monmouth Road facing the road, set back behind front gardens/driveways with beech and conifer hedges. It must be established that the layout of the proposed development includes adequate open areas to ensure that the relatively low-density built form character of this part of Raglan is retained.

- c) the role of the area as a venue for formal and informal sport, general recreation and as community space, expressed in terms of actual usage and facilities available, as well as its relationship to general open space requirements as set out in policy CRF2 (Community Facilities);

The application site is, and always has been, in private ownership meaning that there is no public access to the site which is currently agricultural in use.

- d) the cultural amenity of the area, including places and features of archaeological, historic, geological and landscape importance;

No Registered Historic Landscape, Registered Historic Park & Garden, Scheduled Monument or Listed Building, or previously recorded non-designated asset will be directly affected by any development.

During the course of preparing the application, two potential new sites of archaeological interest have been identified within the proposed development boundary. However, with appropriate mitigation (archaeological watching brief) this issue can be addressed.

- d) the nature conservation interest of the area, through damage to, or the loss of, important habitats or natural features (Policy NE1 applies)

Ecological surveys undertaken are considered sufficient to fully inform the planning application, and to make appropriate recommendations to avoid long-term impacts on key protected species present at the site.

## **6.2 Good Design / Place Making / Historic Environment**

6.2.1 Policy LC5 (Protection and Enhancement of landscape character) of the LDP highlights that development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects. This ties into LDP Policy DES1 which requires that all development be of good design.

6.2.2 The starting point for the proposed layout was to create open areas to retain and if possible, improve, the important view to the castle. Following the initial submission of the application with plans showing 23 dwellings, a revised layout reducing the number of dwellings to 21 has been submitted. The reduction in the number of units, lowers the overall density of the development, creating a more spacious layout that better integrates with the character of the area. While a smaller number of units means a slight reduction in overall housing provision, this change allows for improved site permeability, more open space, and a layout that feels less congested. The lower density therefore ensures a better balance between new development and the existing context, making the site more in keeping with the surrounding area.

6.2.3 The density of development at the site is relatively low, being approximately 2.1 dwellings per 0.1 hectare. This low density is due to the need to retain views through the site, the provision of public open space, wildlife buffers around the edge, and to reflect the general pattern of development in the immediate surroundings.

6.2.4 In terms of the detailed design, further improvements made to the proposed development including:

- Chimneys added throughout development
- Reduction in hard surfacing
- Increase in total Public Open Space area
- Formalised public garden & viewing area
- Removed stone entrance feature
- Increased planting & hedging fronting plots
- Adjusted attenuation basin shape

6.2.5 The revised layout still includes the essential elements of the original design that were introduced to mitigate the impact of the proposed development on the setting of Raglan Castle, including the central avenue providing views to the castle, planting to soften the buildings in views from the castle and the provision of a seating area with interpretation panels overlooking the castle. As such the impact of the proposed development on the setting of the castle will be similar to the original layout.

6.2.6 The built form is proposed as a traditional pattern of streets and perimeter blocks. The blocks are defined with enclosed rear gardens and frontages facing streets /public realm. The main aspect of the development will front Monmouth Road, following the existing building line. The houses located at the front of site have been designed to frame the entrance and the long distance view through the site to Raglan Castle. Other dwellings will have dual aspects and help to aid legibility and maximise active frontage at key points in the site.

6.2.7 In terms of scale, the majority of the proposed houses across the site are two-storey except for a few units whereby these are 2.5 storey. To avoid adverse impact on the setting, the higher dwellings have been located on the lower areas of the site. The density of the development is informed by the scale and density of the surrounding built environment, as well as being designed to represent an efficient use of land consisting primarily of detached dwellings with a small number of semi-detached houses.

6.2.8 The proposed houses have been designed to be traditional in appearance, being generally rectangular in shape with simple pitched roofs. The external materials have been chosen to reflect the existing surrounding built environment within Raglan. A variety of facade elements create continuity across the scheme. These include:

- Window surround details
- Bay windows
- Traditional door styles with glazed panels (grey)
- Cream render
- Reconstituted stone on key buildings (Keinton)
- Chimneys
- Render Plinths
- uPVC White with Woodgrain finish Windows

6.2.8 It is noted that the revised layout has located house types Dartford and Monnow / Ogmor at the northern part of the site with vehicle access to the north removed leaving Public Open Space overlooked but not impacted by vehicular use which is welcome. All public open spaces (including rear parking mews) are proposed to have active frontages with houses facing onto them to provide natural surveillance and an attractive edge to the development. The central green corridor provides a direct visual link to Raglan Castle from Monmouth Road. The public open space at the northern end of the site is intended to be used a space for social interaction and a community focal point.

6.2.9 The respective ridgelines in relation to proposed ground levels have been reduced to the east of the site however the Dartford (plots 8 and 14) remain at 8.7m above ground level. The

layout change has reduced development density of the northern edge of the site. There have also been changes to roof lines and built form aspects (frontage / rear elevations as opposed to gable ends). It is considered that these amendments have improved visual connectivity from the between the castle grounds and open countryside to the south resulting in an overall improved scheme.

6.2.10 The treatment of boundaries can have a significant impact on the overall appearance of a new housing development. It is proposed that adjacent rear gardens will be divided using 1.8m high timber fencing. Where rear gardens adjoin the public realm, the boundary treatment will be stone walling. Front gardens will generally be defined by soft landscaping in the form of shrub planting and / or hedge planting.

6.2.11 It is considered that details of the materials proposed across the site should be agreed prior to commencement of development. This can be conditioned should Members be minded to approve the application.

### **6.3 Green Infrastructure**

6.3.1 Chapter 6 of Planning Policy Wales (PPW) 12 highlights that a Green Infrastructure (GI) statement should be submitted with all planning applications and will be proportionate to the scale and nature of the development. The statement which will need to be informed by a GI assessment of the site will describe how green infrastructure will be incorporated into the proposal and how the step wise approach to protecting biodiversity, habitats and GI onsite will be managed. A step wise approach considers what impacts may occur as a result of development activity to any identified biodiversity, habitats and green infrastructure assets and networks that may be present on or bounding a site. The approach then seeks to manage any harm that may occur by (a) avoiding (b) minimising (c) Mitigate / Restore.

6.3.2 Several existing GI Assets in the surrounding area have been identified including the historic park and garden at Raglan Castle, open space areas, playing fields, a churchyard and cemetery, allotments and Raglan Park Golf Course. Public Rights of Way (PRoW) throughout the area.

6.3.3 Development proposals would result in a change to the character and use of the site. The landscape features of note on the application site boundaries would be retained where possible, and enhanced to maintain the well-established sense of enclosure provided by the existing settlement and mature hedgerow with trees along the southern boundary. The species poor grassland would be replaced by the building footprint and amenity space, natural open space, sustainable drainage features within the site.

6.3.4 In respect of the GI resource present, the development has been designed to retain and protect the valued resources listed above Proposed habitat retention, enhancement, and creation, and the benefits they provide to the ecology and GI network, include:

- The retention of trees and intact hedgerows along the boundaries with exception to a small section of removal along the southern boundary for new access requirements. In addition to continuing to provide shelter and foraging opportunities for protected and notable species, retained vegetation will be enhanced by additional planting to increase separation and privacy between the application site and existing residential development to the north, east and west;
- The re-planting of suitable trees within the existing vegetation along the southern boundary, following removal of Ash trees found to have Ash Dieback and Ash Canker disease;
- Landscaped buffers along the eastern and western edges that are inaccessible to the public (but accessible for maintenance). This would provide a secure, green edge between new and existing properties as well as undisturbed ecological corridors for
- various wildlife, including commuting bats and other protected species recorded on site;

- Sustainable drainage features that will have multifunctional benefits. Planting within swales and attenuation basins will enhance the landscape amenity of Public Open Space (POS) areas, but also providing additional foraging opportunities for badger, invertebrates and amphibians, and deliver benefits to climate regulation, adaptation and resilience. Species-rich wildflower seed mixes and bulb planting will provide abundant diversity which will support ecosystem resilience;
- An area of proposed open space along the northern edge of the Application Site. This space incorporates existing vegetation, which will be bolstered by additional tree planting to strengthen the amenity value and connectivity of the space, and the surrounding landscape. Tree planting will also aid soil stabilisation and provide shade and regulatory benefits with respect to air pollution;
- The removal of all invasive species off the site, including prevention of future spread and establishment;
- Consideration of the movement of people and wildlife, with a focus on providing movement opportunities for wildlife in protected corridors along the eastern and western edges, and movement opportunities for people through the centre of the scheme. In particular, a connection between the open space and wider footpath network (including links to Raglan Castle); and
- Consideration of the Health and wellbeing of future residents. A designated seating area within the open space is proposed that will provide views towards Raglan Castle within a well treed landscape, and Sustainable drainage systems (SuDS) features will be planted to enhance the amenity value of these drainage features.

6.3.5 Where gardens side / back onto the existing hedgerows, a 1.8m timber close board fence will form the boundary with a new hedgerow located outside the ownership of the dwelling to provide privacy.

6.3.6 A variety of pedestrian routes within the site are available. These footpaths are either integral with the street or segregated in areas of public open space.

6.3.7 Following comments noted in the PAC response section and as suggested by Cadw, an Information Board is proposed to be sited within the public open space at the northern end of the site together with a seating area to provide a formal area to enjoy views of Raglan Castle. The information board is proposed to include a description of the castle in view, what components of the castle can be seen from the site and some information as to what the view to the south would have looked like. Reference will be made to the 1852 map and to Thomas Smyth's 17th Century painting of the castle which illustrates a view from the south which shows a former approach and lake in the foreground. The board would be set on a plinth made from local stone.

6.3.8 On the basis of the above, it is considered that the proposed development has considered the step-wise approach by avoiding any statutory landscape and ecology designations, and irreplaceable habitat. Existing features on site that are considered of local value are being retained and protected during development where possible. Where losses to these habitats occur (due to site access), these are fully mitigated for within the scheme (hedgerow). The proposed development has also minimised impacts on biodiversity by selecting a site of low habitat value in poor condition that is frequent in the local area.

6.3.9 The loss of agricultural grassland habitat can be compensated for through the provision of similar grassland habitat that will provide increased diversity and quality. A new hedgerow will be provided along the northern boundary. Elsewhere, all existing hedgerows will be retained and managed, except where removal is required to provide safe access/egress onto Monmouth Road. New tree planting will be provided along the existing north-east and south-west boundary bat corridors to enhance these key wildlife habitats.

## **6.4 Biodiversity**

6.4.1 An Ecological Impact Assessment by Wildwood Ecology has been submitted to inform the scheme. This includes an initial Preliminary Ecological Appraisal survey, as well as Phase 2 surveys for reptiles and bats.

6.4.2 A mature native species-rich hedgerow was identified along the southern boundary of the site. The hedgerow was noted to contain ash, bramble, hawthorn, oak, sycamore and a number of associated floral species. A species-poor hedgerow is also located along the western boundary. Due to the creation of a vehicular entrance and the presence of ash dieback within the southern hedgerow, part of this habitat will be lost as a result of the proposals.

6.4.3 The Landscape Masterplan confirms that native tree planting will be undertaken along the southern boundary and additional native hedgerow planting will be undertaken elsewhere on the site. This is considered to be sufficient mitigation for the loss of part of the hedgerow.

6.4.4 Bat transect surveys were undertaken in May, July and October 2022. Furthermore, static detectors were deployed on site in April, August and October 2022. A total of ten bat species were recorded by the static detectors, including light sensitive species such as lesser and greater horseshoe bats. Lesser horseshoe bats were also recorded during the May 2022 bat transect survey. Whilst two years have passed since the surveys were undertaken, it is not considered that update surveys will be required at this stage as the species composition is unlikely to have significantly changed during the intervening period. The site is 4.7km south-east of Llangovan Church SSSI which is designated for its maternity roost of lesser horseshoe bats.

6.4.5 A Lighting Report has been submitted to inform the application and demonstrate compliance with ILP Bat Conservation Trust Guidance Note 08/18 - Bats and Artificial Lighting in the UK. The report shows that light spill onto the boundary areas, which include the ecological corridors, to be minimal apart from to the south of the site where the road junction is located. The report also confirms that warm colour temperature and peak wavelengths conform with the guidance. Whilst the light spill and specification of the report are deemed acceptable, it is acknowledged that it only details the impacts of street lighting. Any external residential lighting should be low-level, downward facing and not cause light spill onto boundary habitats.

6.4.6 Ash trees were identified along the southern boundary holding low potential for roosting bats due to heavy ivy coverage. The removal of these trees should be undertaken using precautionary measures detailed within a Construction and Environmental Management Plan (CEMP).

6.4.7 The mosaic of semi-improved grassland, tall ruderal and scrub was considered to offer suitable habitat for common reptile species. Reptile surveys were undertaken between April and June 2022. The survey found a medium population of slow worms present on site, with a peak count of ten individuals. Any vegetation removal should be subject to precautionary measures to avoid causing harm or injury to reptiles present on site. Such measures should be detailed within a Construction and Environmental Management Plan (CEMP), which should be conditioned as part of any planning approval.

6.4.8 The EclA recommends that a Reptile and Amphibian Mitigation Strategy is produced subject to final development design. It is also recommended within the report that a hibernaculum is created at the south-east of the site, near the proposed waterbody. However, no such mitigation has been incorporated into the GI Plan. The Landscape Plan does include an element of mitigation by detailing the provision of ecological corridors on the east and west edges of the development.

6.4.9 Slow worm populations can adapt to residential development providing sufficient habitat is provided in the form of mature gardens and ecological corridors. Any Mitigation Strategy should detail the location and design of numerous areas of shelter positioned around the site, as well as the design of the hibernaculum at the south-east of the site.

6.4.10 Hazel dormice are known to be present within the hedgerow network of the local area, with 38 records returned from within 1km. The EclA notes that the species-rich hedgerow bounding the south of the site does offer suitable habitat in the form of bramble and hawthorn vegetation.

However, the hedgerow is isolated from the wider hedgerow network and historical survey results undertaken on the hedgerow have not found evidence of dormice presence. On this basis, it is agreed that dormice are unlikely to be present on-site but, due to the number of nearby records, precautionary measures should be adopted during the construction period and detailed within a CEMP.

6.4.11 A number of great crested newt records were returned from within 1km of the development site. The closest record is a breeding population within a pond located 369m south-east of the site, although the pond is separated from the site by Monmouth Road. A small garden pond was identified 40m to the north of the site but access was not granted for surveys to be undertaken. No waterbodies suitable for breeding were identified on-site, but potential suitable terrestrial habitat was identified. Any vegetation removal should be subject to precautionary measures to avoid causing harm or injury to reptiles present on site. Such measures should be detailed within a Construction and Environmental Management Plan (CEMP), which should be conditioned as part of any planning approval.

6.4.12 The EclA recommends that an Reptile and Amphibian Mitigation Strategy is produced subject to final development design. There is potential to enhance the site for amphibians via the creation of ponds as the landscaping design, which includes waterbodies as part of the surface water drainage proposals. However, such ponds should be permanently wet habitats with appropriate native planting and ongoing management in order to qualify as a habitat enhancement feature. The area at the south of the site, where it is currently proposed to situate an attenuation pond, could be suitable for the creation of a suitable breeding pond as it is close to the proposed location of the hibernaculum and could offer suitable adjacent terrestrial habitat.

6.4.13 A number of bird records were returned from a 1km data search of the site. Whilst no records were returned from the site itself, records of breeding swifts and house sparrows were returned from close proximity (likely associated with the nearby residential areas). The site was noted to contain a number of habitats suitable for supporting populations of nesting birds such as scrub, hedgerows and mature trees. Any vegetation clearance of these habitats should be undertaken outside of the nesting bird season (March - August). Where this is not possible, a pre-works nesting bird check should be undertaken by an experienced ornithologist. Such precautionary construction measures should be detailed in a CEMP.

6.4.14 The EclA recommends that 13x13cm will be left at the bases of fences/walls on the site, particularly along boundaries and between gardens to accommodate the hedgehog population.

6.4.15 Planning Policy Wales (PPW) 12 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity" (para 6.4.5 refers). This policy and subsequent policies in Chapter 6 of PPW 12 respond to the Section 6 Duty of the Environment (Wales) Act 2016.

6.4.16 Native tree and hedgerow planting is proposed to be undertaken throughout the site. This is welcomed and it is acceptable for the species list, planting schedule and ongoing management to be detailed within a Green Infrastructure Management Plan (GIMP). Planting should comprise predominantly native species due to their disproportionately positive impact on invertebrate fauna. Ornamental species which offer value for native species, such as pollinators, may also be adopted where evidence of such benefits are robust. The proposed native tree planting to the west of the site appears to be within the drainage feature. If this is to be acceptable, then suitable measures for management such as access provision and drainage management must be considered in the landscape maintenance plan which should be a condition on any consent that Members are minded to approve.

6.4.17 A Biodiversity Enhancement Plan has been submitted to inform the application, updated to account for the new site layout. The placement of the swift and bat boxes has been altered. During previous pre-application meetings it has been requested that in-built swift boxes were located along the main avenue of the site. Swifts are communal species, and such nest sites should be located within close proximity to each other to increase chances of utilisation. Furthermore, swifts

generally need an open area adjacent to nest sites, and locating the boxes against the edge of the site where vegetation is liable to grow and to limit such clearance areas is not preferable. Therefore, it is requested that swift boxes are relocated back to their original locations or elsewhere along the main thoroughfare of the site. This can be secured via condition.

6.4.18 Through the provision of hibernacula, and appropriate management detailed in the Reptile and Amphibian Mitigation Strategy, the site can be enhanced for the extant slow-worm population and any great crested newts. This should include an element of pond creation for biodiversity, as well as suitable planting and ongoing management. It is suggested that areas of the site for such habitat creation be marked up on the submitted Biodiversity Enhancement Plan.

6.4.19 NRW have advised that they support the precautionary approaches to habitat clearance and tree felling for bats, dormice, otter and GCN during the construction phase of the proposal and the strategy for a sensitive lighting mitigation for bats during the operational phase of the proposal. The Ecological Impact Assessment by Wildwood Ecology referred to by NRW has been included in the list of plans and documents as requested.

6.4.20 Under the Conservation of Habitats and Species Regulations 2017 it is necessary to consider whether the development should be subject to a Habitat Regulations Assessment. This is in particular reference to the impact of increased concentrations of Phosphates on designated SAC s. NRW has set new phosphate standards for the riverine SAC s of the Wye and Usk and their catchment areas. Development that may increase the concentration of phosphates levels will be subject to appropriate assessment and HRA.

6.4.21 Under the Habitats Regulations, where a plan or project is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, and where it is not directly connected with or necessary to the management of the site, the competent authority must carry out an appropriate assessment of the implication of the plan or project in view of the site s conservation objectives. Natural Resources Wales has set new nutrient standards for the river SACs in Wales. Any proposed development within the SAC catchments that might increase the amount of nutrient within the catchment could lead to additional damaging effects to the SAC features and therefore such proposals must be screened through a HRA to determine whether they are likely to have a significant effect on the SAC condition.

6.4.22 This application has been screened in accordance with Natural Resources Wales advice for planning applications within the river Special Areas of Conservation (SACs) catchments (v4 issued 28th June 2024). Based on a Test of Likely Significant Effect, the project is unlikely to have a Significant Effect on the phosphate sensitive River SAC alone. This is because there is capacity to treat additional wastewater from the proposed development within revised environmental permit limits (meaning both nutrient limits with immediate effective dates and for some permits, tighter nutrient limits with future effective dates), and the Raglan WwTW is currently operating in compliance with permit conditions.

6.4.23 Therefore, with regards to impacts from phosphates there is unlikely to be a significant effect on the River SAC and a full Appropriate Assessment is not required.

6.4.24 However, whilst the Raglan WwTW has a phosphorus consent limit of 1 mg/l and is currently compliant with this consent limit it is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance. Accordingly, DCWW have advised that there is currently a lack of hydraulic capacity in the public sewerage system and downstream WwTW to accommodate foul water flows from the development subject of this application. Notwithstanding this, in line with the environmental regulator's National Environment Programme, DCWW are required to deliver a scheme at the WwTW to ensure 95% quartile compliance with our FPF performance. Therefore, a Grampian condition, aligning to the date of delivery, is proposed that would mean no buildings on the application site shall be brought into use earlier than 31/12/2027, unless the upgrading of the public sewerage system, into which the development shall drain has been completed. As this would be within the lifespan (5 years) of the consent then this is considered an appropriate Grampian condition that meets the relevant tests of the Welsh Government Circular 016/2014 *The Use of Planning Conditions for Development Management*.



## **6.5 Impact on Amenity**

6.5.1 Policy EP1 of the LDP provides that proposals for new buildings should have regard to the privacy, amenity and health of occupiers of neighbouring properties. In this case the nearest existing neighbouring dwellings to the application site are Caernarvon to the east and Hawthorne House to the west.

6.5.2 The proposed layout is designed as such that it is mostly garden areas that will share a boundary with these properties. The nearest proposed new dwellings have principal elevations facing onto Monmouth Road to the south so that only non-habitable gable end windows face onto the neighbouring dwellings referred to above. To the east the gable-to-gable distance is approximately 13m. To the west, Hawthorne House is oriented with the rear elevation facing the application site but again there are no windows on the western elevation of the proposed nearest new dwelling that directly face this dwelling. There will be approximately 21 - 22m between the dwellings. The orientation of the existing and proposed dwellings and the distances between them will ensure that there is no loss of privacy for either existing or future occupiers. Nor will the proposed new dwellings (which are proposed to be two-storey) appear overbearing when viewed from within the neighbouring houses or garden areas.

6.5.3 To the south, the proposed public open space will provide a buffer of at the narrowest point, 10m between any built development on the application site and the boundaries of any existing dwellings. A distance of approximately 28m is achievable between the front elevation of Plot 14 and the nearest existing dwelling to the north on Old Monmouth Road. As such, the privacy and amenity of the existing occupiers to the south of the application site will also be protected.

6.5.4 The proposed new dwellings within the site have been designed and orientated so as not to directly overlook one another while maintaining views over public areas for natural surveillance and a sense of place.

6.5.5 Policy CRF2 of the LDP provides that proposals for new residential development should provide appropriate amounts of outdoor recreation and public open space. Any provision should be well related to the housing development that it is intended to serve. This ties into Green Infrastructure policy GI1 and the current version of Planning Policy Wales (Edition 12). In this case, an area of public open space is to be provided on site by the developer. This will be available for the general public to enjoy, not just residents of the proposed new development. A financial contribution towards the improvement of existing local play areas will also be sought as part of a Section 106 agreement should Members be minded to approve the application. See also Section 6.10 below.

## **6.6 Transport**

### **6.6.1 Sustainable Transport Hierarchy**

6.1.6.1.1 The application site is conveniently located within a village, within walking/cycling distance to primary education, retail and the post office, and small employment sites. Active travel access to local bus services is also good. NCN 423 runs directly past the site. The site also has direct access to national Cycle Route 423, which then connects to the wider national cycle network.

6.1.6.1.2 As such, the application site is considered to be an appropriate location for new residential development.

### **6.6.2 Access / Highway Safety**

6.6.2.1 The Transport Statement submitted with the application has assessed the effect of the traffic impact from the proposed development of 23 residential dwellings (as originally proposed) on the local highway network. The projected trip rates from the proposed development have been obtained from the TRICS database which is the recognised database for trip rate information. The

projected trip rates in the AM peak period are projected at 11 two-way trips and 10 two-way trips in the PM peak period.

6.6.2.2 Highways have considered the submitted data it is accepted that the level of traffic proposed from the development will have no adverse impact on the safety and capacity on the local network. This was based on 23 dwellings and therefore it also follows that 21 dwellings will generate slightly fewer trips and are also therefore acceptable in terms of impact on the wider highway network.

6.6.2.3 It should be noted that the A40 is a Trunk Road and is therefore the arrangement of the junction with Monmouth Road is under the control of the Welsh Government.

6.6.2.4 A single vehicular access point is proposed onto the site via Monmouth Road. Visibility splays of 2.4m x 12.9m have been demonstrated as being achievable which meets the necessary common standards.

6.6.2.5 An existing footpath runs along Monmouth Road linking the site to the village centre. There are concerns raised by Highways that the footway on the eastern side of the junction is below the standard width of 2m. The plans now show this being improved to a minimum width of 2m along the full site frontage. This will require the removal of a number of Ash in the hedge suffering from Ash Dieback. Their removal, along with the positive management of the hedge and removal of non-native species, allows for the creation of the footway which at present is not far off being 2m wide in any case.

6.6.2.6 Only the main spine road and turning head would be considered for adoption as public highway and the shared accesses for dwellings would remain private. While normally only 5 dwellings are acceptable off a private road, 7 dwellings are shown to be accessed from one area of private road in the latest proposed layout. These dwellings are all to be affordable and are all likely to be managed by a single social housing provider making ongoing maintenance of the road and parking areas easier to control. Various layouts have been looked at which reduced the number of dwellings from a single private drive but these result in a loss of open space and therefore on balance, the layout proposed is considered to be acceptable.

### 6.6.3 Parking

6.6.3.1 Car-parking provision follows the guidelines established in Monmouthshire Parking Standards, 2013 at a rate of one space per bedroom (up to a maximum of 3). Car parking provision has been catered for in a variety of ways, including on plot via driveways, on-street and small mews courts. Garages have been provided for the larger dwellings only. These will be detached and set back to the rear of the houses and meet the internal size requirements for parking. Cycle storage has been located within either the garages or separate secure rear gardens storage.

## **6.7 Affordable Housing**

6.7.1 There are currently 2113 households on the Monmouthshire Common Housing Register with an identified housing need waiting for a house in this area. Raglan is covered by the Rural Allocations Policy meaning that the Affordable Housing will be prioritised to applicants with a local connection to Raglan initially, followed by the neighbouring communities of Llanarth, Mitchel Troy, Trellech United, Devauden, Llangwm, Llantrissant Fawr and Gwehelog Fawr. There are currently 147 households in housing need with a local connection to one of the above-named communities, of these the majority require one-bedroom homes (59%), followed by two-bedroom homes (27%).

Number of units (21 @ 35% = 7.35 units)

2-person 1 bed flat     4  
4-person 2 bed house 3  
5-person 3 bed house 1

6.7.2 The proposal is to go above the minimum requirements of the Welsh Development Quality Requirements 2021 and provide homes that are highly insulated and that need less energy is welcome.

## **6.8 Flooding**

6.8.1 The site is within Flood Zone A (Considered to be at Little or No Risk of Fluvial or Coastal/Tidal Flooding) in the current Development Advice Maps and Flood Zone 1 in the emerging Flood Map for Planning. Neither map identifies the site as being at risk of surface water flooding.

6.8.2 A Flood Consequences Assessment and Drainage Strategy and Engineering Layout Sheet 1, drawing number 100-1, revision F and Engineering Layout Sheet 2, drawing number 100-2, revision D has been included in the list of documents and plans that will appear on any decision and referred to by condition as requested by NRW.

## **6.9 Surface Water Drainage**

6.9.1 The applicants have demonstrated a means of surface water discharge (rainwater harvesting, infiltration, watercourse, surface water sewer or combined sewer). This will be subject to separate drainage approval for installation of the new surface water pipe under the Monmouth Road to the Barton Brook.

6.9.2 The development will be subject to formal SAB consent prior to commencement of development. Management and maintenance of the surface water drainage features such as ponds and swales will be fully addressed during the SAB consent process.

## **6.10 Planning Obligations**

6.10.1 Based on MCC s adopted standards of off-site recreation a contribution of £3,132 per dwelling would be required to be spent within Raglan (potentially towards a new Community Hub and associated facilities). In terms of play equipment, there is a move towards more informal, wild play, away from fixed Local Areas of Play which are under-used and expensive to maintain.

6.10.2 A contribution will also be sought for supporting sustainable transport (such as buses) in the local area.

6.10.3 Due to increased footfall as a result of the additional houses, a contribution of £1500 would be expected towards the maintenance of Public Rights of Way in the area.

6.10.4 Education contributions will be required for this development. Taking into account the open market dwellings only, the rate provided during the RLDP assessment is £29,046 per unit so the total education contribution would be £116,184.

## **6.11 Response to the Representations of Third Parties and/or Community/Town Council**

6.11.1 The principle of residential development at the site is addressed in Paragraph 6.1 above including in relation to the designation of the site as an Area of Amenity Importance. Previous refusals of planning applications on or near to the site do not hold any weight as each application must be considered on its own merits having regard to the detailed design and local and national policies. Similarly, allowing this development would not set a precedent for major developments on green field sites in conservation areas, in Raglan or elsewhere in Monmouthshire for the same reasons. Other general objections are addressed in the following paragraphs.

6.11.2 There is no evidence that the proposed new housing site will overwhelm local services.

6.11.3 Any Covenants (if found) upon the land precluding residential development would need to be lifted prior to commencement of development *outside of the planning process*.

6.11.4 DCWW have confirmed that there is capacity within the local Waste Water Treatment Works.

6.11.5 It is a requirement of LDP Policy that 35% of dwellings on all major residential developments are available for local affordable housing providers. On smaller sites such as this, it may be necessary for the private dwellings to be larger so as to make the overall site economically viable.

6.11.6 In terms of sustainable transport, while it is acknowledged that public transport in and out of Raglan is poor, the village itself does offer a range of services that are all within easy walking distance. It should also be noted that there has been a significant increase in people working from home since the Covid 19, reducing the frequency for the need to commute to a central place of work.

6.11.7 In terms of the accepted historic sightline across the site to the castle, the layout of the proposed development has been carefully designed to retain and enhance this view by keeping built development to either side, frame the view with a central avenue and create a new green space where the public can enjoy views. At present there is no public access to the site, or views across due to existing hedgerows which the Council has no control over in terms of cutting back. Noting that nobody can promise a long-term view of the castle from the view point due to intervening private land, the opening up of the site to the public will be an improvement on the existing situation.

6.11.8 The historic importance of the field and view has been considered by both Cadw and the Council's Heritage Officer who have both agreed that the development proposed is acceptable in this context.

6.11.9 The value of private dwellings is not a material planning consideration.

6.12.10 Highway safety is addressed in Paragraph 6.6.2 above.

### **6.13 Well-Being of Future Generations (Wales) Act 2015**

6.13.1 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.

### **6.14 Conclusion**

The application site is within the Raglan settlement boundary as defined under LDP Policy S1.

Raglan is considered an appropriate settlement for a level of new housing that is proportionate to its scale, accessibility, and range of available services.

Public open areas within the site mean that the important historic view of the castle will be retained and therefore there will be no adverse impact on land designated as an Area of Amenity Importance.

There are no grounds for objection based on the proposed access and parking or wider impact on highway safety.

The development will protect existing Green Infrastructure features and provide net gain in terms of public open space and biodiversity.

There will be no adverse impact on the River Usk SAC.

## **7.0 RECOMMENDATION: APPROVE**

Subject to a 106 Legal Agreement requiring the following:

1. Seven of the dwellings to remain affordable in perpetuity.
2. £29,046 per open market dwelling for the provision of education (14 dwellings at £29,046 = £116,184).
3. A sum of £1500 to contribute to improvements to the local PROW network including GI improvements associated with the PROW network.
4. A combined off-site play and adult recreation contribution of £3,792 per dwelling to be spent on improved facilities within the local area of Raglan settlement to include improvements to play provision and associated GI assets and habitat.
5. To enter into a Section 278 with the Highway Authority for the construction of the approved means of access onto Monmouth Road including footway provision outside of the application site boundary.

### S106 Heads of Terms

If the S106 Agreement is not signed within 18 months of the Planning Committee's resolution then delegated powers be granted to officers to refuse the application.

#### **Conditions:**

- 1 This development shall be begun within 5 years from the date of this permission.

REASON: To comply with Section 91 of the Town and Country Planning Act 1990.

- 2 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.

- 3 No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.

REASON: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

- 4 No buildings on the application site shall be brought into use earlier than 31/12/2027, unless the upgrading of the public sewerage system, into which the development shall drain has been completed and written confirmation of this has been issued to the Local Planning Authority by Dwr Cymru Welsh Water.

REASON: To prevent further hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

- 5 No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.

6 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.

7 Prior to the commencement of development full and comprehensive details of soft and hard landscape works shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:

- Detailed scaled plans, showing existing and proposed levels inclusive of proposed cross section and RPA.
- Proposed and existing utilities/services above and below ground.
- Soft landscape details for landscaping both private frontage and public strategic to include planting plans, specifications including species, size, density, number and location, cultivation and other operations associated with planting and seeding establishment, inclusive of SUDS green engineering.
- Hard landscape materials to include surfacing, SUDs, location of proposed lighting, fencing, gates and access path, minor artefacts and structures (e.g. signs, bins, stores,).
- Lighting strategy
- Details of the proposed LAP and associated low level play equipment ref plan 110\_B (LANDSCAPING PLANS) GREEN INFRASTRUCTURE PLAN
- Details of the proposed information board 110\_B (LANDSCAPING PLANS) GREEN INFRASTRUCTURE PLAN

REASON: In the interests of visual and landscape amenity; in accordance with Policies DES1 & LC1/5 of the Local Development Plan.

8 A schedule of landscape maintenance for a minimum period of five years shall be submitted to and approved by the Local Planning Authority prior to works commencing and shall include details of the arrangements for its implementation inclusive of roles and responsibilities. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the building(s) or the completion of the development, whichever is the sooner, and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

REASON: To ensure the provision of amenity afforded by the proper maintenance of existing and / or new landscape features.

9 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 part of the development or in accordance with the timetable agreed with the Local Planning Authority.

REASON: To ensure the provision, establishment and maintenance of a reasonable standard of landscape in accordance with the approved designs and ensure the provision afforded by appropriate Landscape Design and Green Infrastructure LC5, DES 1, S13, and GI 1 and NE1.

10 A Green Infrastructure Management Plan shall be submitted to, and be approved in writing by, the local planning authority prior to the occupation of the development. The content of the Management Plan shall include the following;

a) Description and evaluation of Green Infrastructure assets to be identified, protected and managed in the GI management plan.

a. Trees, Grassland, Shrubs and hedgerows inclusive of strategic planting to compensate for loss

b. Green corridors c. SUDs, Water bodies

b) Opportunities for enhancement to be incorporated

- a. Management of hedgerows and wildflower grassland for botanical species diversity and / or protected species including reptiles
- b. Management of tree, understorey and hedge and wood buffer strips to increase and maintain diversity, connectivity and screening
- c. Maintain GI and habitat connectivity through and or around the perimeter of the site for species
- c) Trends and constraints on site that might influence management of above features.
- d) Aims and objectives of management.
- e) Appropriate management options for achieving aims and objectives.
- f) Prescriptions for management actions inclusive of landscaping, landscape planting and SUDS.
- g) Preparation of a landscape maintenance and habitat management work schedule (including an annual work plan capable of being rolled forward over a twenty-year period).
- h) Details of the body or organization responsible for implementation of the plan.
- i) Ongoing monitoring and remedial measures.

The Management Plan shall also 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 as appropriate. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the Green Infrastructure 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 Green Infrastructure objectives of the originally approved scheme. The approved plan will 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. (Legislative background - Well Being of Future Generations Act 2015, Planning (Wales) Act 2015 Environment (Wales) Act 2016).

11. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.
  - a) Risk assessment of potentially damaging construction activities.
  - b) Identification of "biodiversity protection zones".
  - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction on the following protected species(may be provided as a set of method statements):
    - i. Bats
    - ii. Nesting Birds
    - iii. Reptiles
    - iv. Amphibians
  - d) The location and timing of sensitive works to avoid harm to biodiversity features.
  - e) The times during construction when specialist ecologists need to be present on site to oversee works.
  - f) Responsible persons and lines of communication.
  - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
  - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

REASON: To safeguard species protected by the Wildlife and Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010.

- 12 The approved 'Biodiversity Enhancement Plan' drawing by the Environmental Dimension Partnership, which illustrates the position of the biodiversity net benefit features, shall be implemented in full and shall be retained as such in perpetuity. Evidence of compliance with the plan in the form of georeferenced photographs must be provided to the LPA no more than three months later than the first beneficial use of the development.

REASON: To provide biodiversity net benefit and ensure compliance with PPW 12, the Environment (Wales) Act 2016 and LDP policy NE1.

13 No development shall take place (including demolition, ground works, vegetation clearance) until a Reptile and Amphibian Mitigation Strategy has been submitted to and approved in writing by the local planning authority, as recommended in the Ecological Impact Assessment report by Wildwood Ecology. At a minimum, this should detail:

- i. Appropriate long-term management to ensure amphibian and reptile populations on site are retained and enhanced
  - ii. An appropriate level of habitat creation across the site for reptile and amphibian species
- REASON: To safeguard species protected by the Wildlife and Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010.

14. Prior to any works commencing on site a Construction Traffic Management Plan (CTMP) shall be submitted to and approved by the local planning authority, the CTMP shall take into account the specific environmental and physical constraints of the adjoining highway network. The CTMP shall include traffic management measures, hours of working, measures to control dust, noise and related nuisances, measures to protect adjoining users from construction works, provision for the unloading and loading of construction materials and waste within the curtilage of the site, the parking of all associated construction vehicles. The development shall be carried out in accordance with the approved CTMP.

REASON: In the interests of highways safety and to ensure compliance with Policy MV1

15 Notwithstanding the provisions of Article 3, Schedule 2, Part 1 Classes A B C D E F & H of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2013 (or any Order revoking and re-enacting that Order with or without modification) no enlargements, improvements or other alterations to the dwellinghouse or any outbuildings shall be erected or constructed.

REASON: To safeguard the residential amenity of future occupiers as well as to preserve the character and appearance of the Raglan Conservation Area in accordance with Policies DES1, EP1 and HE1.

16 Notwithstanding the provisions of Article 3, Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) 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 preserve the character and appearance of the Raglan Conservation Area in accordance with Policies DES1 and HE1.

## **INFORMATIVES**

1 Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.

2 As of 7th January 2019, all construction work in Wales with drainage implications, of 100m<sup>2</sup> or more, is now required to have Sustainable Drainage Systems (SuDS) to manage on-site surface water (whether they require planning permission or not). These SuDS must be designed and constructed in accordance with the Welsh Government Standards for Sustainable Drainage.

The SuDS Approving Body (SAB) is a service delivered by the Local Authority to ensure that drainage proposals for all new developments of at least 2 properties OR over 100m<sup>2</sup> of construction area are fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage published by Welsh Ministers.

If you are in any doubt as to whether you require SAB approval, please contact:

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



For advice regarding the application process and general enquiries - 01495 768306

For technical advice regarding your SuDS design and meeting the National Standards - 01633 644730

3 The Naming & Numbering of streets and properties in Monmouthshire is controlled by Monmouthshire County Council under the Public Health Act 1925 - Sections 17 to 19, the purpose of which is to ensure that any new or converted properties are allocated names or numbers logically and in a consistent manner. To register a new or converted property please view Monmouthshire Street Naming and Numbering Policy and complete the application form which can be viewed on the Street Naming & Numbering page at [www.monmouthshire.gov.uk](http://www.monmouthshire.gov.uk) This facilitates a registered address with the Royal Mail and effective service delivery from both Public and Private Sector bodies and in particular ensures that Emergency Services are able to locate any address to which they may be summoned. It cannot be guaranteed that the name you specify in the planning application documents for the address of the site will be the name that would be formally agreed by the Council's Street Naming and Numbering Officer because it could conflict with the name of a property within the locality of the site that is already in use.

4 All birds are protected by the Wildlife and Countryside Act 1981. The protection also covers their nests and eggs. To avoid breaking the law, do not carry out work on trees, hedgerows or buildings where birds are nesting. The nesting season for most birds is between March and September.