Newport City Council

Local Development Plan

Hearing Session 14: Alternative Housing Sites 2 – Bettws, Malpas, Caerleon and Christchurch

2pm – Thursday 8th May 2014
1. Rep 1117: Land at Llwynhaid, Bettws (approx 15.5ha/200 units).

- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

1.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

- Is the site free from constraints and deliverable?

1.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 – page 12).

1.3 The central portion of the site, alongside Bettws Brook, is located in an area of flood risk both Zone C2 of the Development Advice Map (DAM). In addition the site is within an area of flood risk from surface water. The site is not required to meet the housing need during the Plan period and does not comply with the Plan’s brownfield and regeneration-led strategy, being greenfield in nature. There is no evidence provided to justify the management of the flood risk associated with the site. Therefore based on this information the Council considers that it does not satisfy National Planning Policy.

1.4 The northern portion of the site (north of Bettws Brook) falls within the proposed Special Landscape Area (SLA) designation, North of Bettws. The justification for its designation is set out in the Special Landscape Areas Background Paper – SD71. The SLAs have been designated on the basis of the nationally recognised LANDMAP assessment process. The allocation of this site for development would be inconsistent with this SLA allocation.

1.5 Newport City Council’s Highways Section notes that the existing infrastructure is not suitable for the proposed large scale development and further assessments would be required. The site has a public right of way running through it which would need to be maintained.

1.6 Newport City Council’s Green Services Section and Natural Resources Wales have objected on the basis that the proposal is contrary to the Plan’s strategy and would encroach into an area of Countryside. It also has the potential to affect a Site of Importance for Nature Conservation (SINC) (Bettws Brook, for more details see background document Sites of Importance for Nature Conservation SD78) and has the potential to affect European Protected Species.

- Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

1.7 The area is allocated as Countryside, and development of the site would serve to undermine that allocation. It is in area of high flood risk (Zone C2) and as such an allocation for highly vulnerable development in this area would be contrary to National Planning Policy.
1.8 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8: this site is not considered to follow this sequence. Inclusion of the site for residential development is not supported by the Council.

2. Rep 3211: Land at Bettws Hill, Bettws (approx 3.7ha/90 units).

- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

2.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

- Is the site free from constraints and deliverable?

2.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 –page 15).

2.3 Newport City Council’s Green Services and Natural Resources Wales have objected on the basis that the proposal is contrary to the Plan’s strategy and would encroach into an area of Countryside.

2.4 The site is located adjacent to the settlement boundary and is greenfield, currently allocated as Countryside.

- Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

2.5 The area is allocated as Countryside, and development of the site would serve to undermine that allocation.

2.6 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8 and this site is not considered to follow this sequence. Inclusion of the site for residential development is not supported by the Council.


- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?
3.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

- Is the site free from constraints and deliverable?

3.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 –page 106).

3.3 The southernmost part of the site is located in an area of Zone C2 flood risk as identified in the Development Advice Map (DAM). The site is also within an area of surface water flood risk. The site is not required to meet the housing need during the Plan period and does not comply with the Plan’s brownfield and regeneration-led strategy, being of the Plan and is greenfield in nature. There is no evidence provided to justify the management of the flood risk associated with the site. Therefore based on this information the Council considers that it does not satisfy National Planning Policy.

3.4 Newport City Council’s Highway Section notes that vehicular access does not appear feasible due to the topography of the site and woodland/dense vegetation, especially to the south. Access from Claremont or Pilton Vale would not be acceptable. Direct access off the dual carriageway would not be acceptable. There is no direct access to public transport.

3.5 Newport City Council’s Green Services Section has objected on the basis that the proposal is contrary to the Plan’s strategy and would encroach into an area of Countryside and Green Wedge. It also has the potential to affect two SINC’s (Pilton Vale Brook & Pilton Vale East: for more details see background document Sites of Importance for Nature Conservation SD78) and also has the potential to impact on woodlands and/or trees with the potential to be protected with Tree Preservation Orders if this development pressure was realised. The southern portion of the proposed site is considered an important piece of local accessible green space, and the majority of the site is recognised as an Environmental Space. The whole of the site lies within a Green Wedge.

3.6 The site is located adjacent to the settlement boundary and is greenfield, currently allocated as Countryside and Green Wedge. The proposal would impact upon the openness of the area and encroach towards the Authority’s boundary with Torfaen. Part of the site lies within the Torfaen LPA area and was considered as part of Torfaen County Borough Council’s LDP process. Torfaen Council concluded that the site was not required due to environmental issues and suitable housing land being provided elsewhere within the Authority. This was supported by the Inspector examining their LDP.

- Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

3.7 The area is allocated as Countryside, Green Wedge and the majority is within an Environmental Space. Development of the site would serve to undermine those allocations. Part of the site is in area of high flood risk (Zone C2) and as such an
allocation for highly vulnerable development in this area would be contrary to National Planning Policy.

3.8 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8 and this site is not considered to follow this sequence. Inclusion of the site for residential development is not supported by the Council.

4. Rep 1501: Land adjacent to Parkwood House, Caerleon (approx 1.132ha/4 units).

- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

4.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

- Is the site free from constraints and deliverable?

4.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 – page 18).

4.3 The site is located adjacent to the settlement boundary and is greenfield, currently allocated as Countryside and Green Wedge. The proposal would impact upon the openness of the area and encroach towards the Authority’s boundary with Torfaen. The development would be visually prominent due to the topography of the area.

4.4 Newport City Council’s Green Services Section has objected on the basis that the proposal is contrary to the Plan’s strategy and would encroach into an area of Countryside and Green Wedge. The area is of high visual and amenity landscape value. The section also notes the presence of Tree Preservation Orders on the western edge of the site and ancient woodland to the northern edge of the site.

4.5 Newport City Council’s Highway Section notes that there is not enough land to provide vehicular access to the site to meet the required standards (width and footpaths) and the gradient does not allow alternative access to the site. There is also a Public Right of Way running to the north of the site which would need to be maintained.

4.6 The area of Caerleon is within one of Newport’s Air Quality Action areas and as such increased traffic to the area is a concern. Careful consideration is required of any development that could exacerbate this problem.

4.6 The Conservation Officer (Historic Environment) for Newport notes that the site is located in area of historical interest, with the Scheduled Ancient Monument of the Lodge Hill Fort lying to the east of the proposed site. The close proximity to the site does highlight the potential impact further development in the area could have upon the setting of the historic asset.
• Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

4.7 The area is allocated as Countryside, and development of the site would serve to undermine that allocation. It also has the real potential to impact negatively upon the sensitive historic landscape and affect the setting of a Scheduled Ancient Monument.

4.8 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8 and this site is not considered to follow this sequence. Inclusion of the site for residential development is not supported by the Council.

5. Rep 3985 (i): Land at Newport High School O.B. RFC, Caerleon (approx 1.6ha/? units).

• On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

5.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

• Is the site free from constraints and deliverable?

5.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 –page 21).

5.3 Natural Resources Wales has noted that the proposal has the potential to affect a Special Area of Conservation (SAC) due to its location adjacent to the Afon Llwyd, a tributary of the River Usk (SAC). The location adjacent to the river also increases the potential to impact on European Protected Species.

5.4 Newport City Council’s Green Services Section has objected to the site because it has the potential to affect a SINC (Afon Llwyn - Freshwater linear stream which supports otter population, for more details see background document Sites of Importance for Nature Conservation SD78). There are also six Tree Preservation Orders located adjacent to or within the site’s boundary.

5.5 Most significantly, the whole of the site is located in an area of flood risk both Zone C2 of the Development Advice Maps (DAM) and surface water. National Planning Policy is explicit that highly vulnerable development such as residential development should not be allowed in zone C2 flood risk areas. Notwithstanding this clear objection, the site fails to meet the tests set out in Section 6 of Technical Advice Note 15 ‘Development and Flood Risk’: the site is not required to meet the strategy of the Plan and the majority of the site is greenfield in nature. There is no evidence
provided to justify the management of the flood risk associated with the site. Therefore based on this information the Council considers that it does not satisfy National Planning Policy.

5.6 Part of the site is allocated as Environmental Space due to the formal play space at the Rugby Ground. It also has a long distance cycle route running through the site. The loss of these community spaces would have a negative impact on the area.

5.3 The area of Caerleon is within one of Newport’s Air Quality Action areas and as such increased traffic to the area is a concern. Careful consideration is required of any development that could exacerbate this problem.

- Would allocation of the site fit with the plan strategy? What principal factors lead to this view?

5.4 The area is allocated as Countryside, and development of the site would serve to undermine that allocation. It is in area of high flood risk (Zone C2) and as such an allocation for highly vulnerable development in this area would be contrary to National Planning Policy. In addition the site has the potential to impact on international ecological sites.

5.5 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8 and this site is not considered to follow this sequence. Inclusion of the site for residential development is not supported by the Council.


- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

6.1 The Council is not promoting this site for inclusion in the Plan; this is for the representor to demonstrate. However, the Council considers that its Plan is sound without the inclusion of this site.

- Is the site free from constraints and deliverable?

6.2 The Council’s assessment is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 –page 24).

6.3 Dwr Cymru Welsh Water notes that the proposal exceeds the theoretical design of the Christchurch Waste Water Treatment Works.
6.4 Natural Resources Wales has noted that the proposal has the potential to affect European Protected Species and established hedgerows known to be in the vicinity of the site.

6.5 The area has some other environmental constraints adjoining the site with two Tree Preservation Orders to the south of the site and woodland to the north of the site. The northern boundary also is subject to surface water flood risk.

- **Would allocation of the site fit with the plan strategy? What principal factors lead to this view?**

6.6 The area is allocated as Countryside, and development of the site would serve to undermine that allocation. The size of the site is significant, with the outline of the proposal equivalent to half of the existing village. It is noted that the proposer refers to the site accommodating just 25 or so executive homes, but this would represent a very low density development, out of keeping with the surrounding village and contrary to the minimum density policy that has emerged from previous examination sessions. It would be difficult to resist a higher density development were this site allocated in the Plan. The development would arguably have a great impact on the existing settlement. It is questioned as to whether adequate infrastructure can be found for the site in terms of waste water treatment and the site has the potential to impact on some environmental assets.

6.7 The site’s location does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area. The Council’s Strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8 and this site is not considered to follow this sequence. Christchurch village has limited amenities and future residents would in all likely be highly car dependent, making the proposed site unsustainable. Inclusion of the site for residential development is not supported by the Council.