Newport City Council
Local Development Plan

Hearing Session 16: Alternative Housing Sites 4 – Castleton/Marshfield

2pm – Friday 9th May 2014
Rep 2062: Land at Marshfield Road (Gelli Bach), Castleton (approx. 1.1ha/?? 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. The Council is satisfied that sufficient land has been allocated for residential development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.

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 130).

1.3 The Council’s Highway’s section has opposed use of this site on highway grounds as Bakery Lane is a private lane with no highway rights. The lane is narrow with few passing places and not suitable for two way traffic. It has no footway/cycle way and is therefore reliant on the private motor car. This will result in an unsustainable form of development.

1.4 Consultation with Welsh Government’s Land Use Planning Unit regarding the Agricultural Land Classification Section confirmed that there is moderate probability of Best Most Versatile agriculture land subgrade 3a at this site. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.

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

1.5 The site falls within the proposed Special Landscape Area (SLA) designation on the Wentlooge Levels. 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 Gwent Levels are a registered historic landscape.

1.6 The LDP proposes to allocate this site as part of the SP7(i) - Green Wedge – Newport and Cardiff. The Green Wedge allocation is within the Wentlooge Levels and is characterised by a flat open landscape. The area, including the Green Belt to the west, serves to protect the open character of the area and avoid the coalescence of the distinct communities of Newport and Cardiff.

1.7 Inclusion of this greenfield site, situated on the edge of a village does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area, and within the Eastern Expansion Area as part of a comprehensive sustainable development. 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 within the village boundary is not supported by the Council.
2 Rep 2070: Chicken Processing Plan Site, Castleton (approx. ??ha/7ha)

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. The Council is satisfied that sufficient land has been allocated for residential development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.

Is the site free from constraints and deliverable?

2.2 The Council’s assessment of the site is set out in the Alternative Sites Assessment at the Revised Stage (SD31 – page 127).

2.3 There is a current planning application under consideration by the Council for 7 dwellings on the site. The Council’s Highway Section has several concerns relating to the development of the site and has opposed the application. A copy of the comments made in relation to the application is attached at Appendix 1.

2.4 It is understood that the site is currently available for purchase. The access road leading from the public highway to the site is within separate ownership(s), however it is believed that access rights exist.

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

2.5 The LDP proposes to allocate this site as part of the SP7(i) - Green Wedge – Newport and Cardiff. The Green Wedge allocation is within the Wentlooge Levels and is characterised by a flat open landscape. The area, including the Green Belt to the west, serves to protect the open character of the area and avoid the coalescence of the distinct communities of Newport and Cardiff. The site also falls within the proposed SLA designation on the Wentlooge Levels. The justification for its designation is set out in the Special Landscape Areas Background Paper – SD71.

2.6 It is noted that the site is partially brownfield, however, it is set back from the main village area in a rural setting. 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 within the village boundary is not supported by the Council.

3 Rep 3220: Land at Bakery Lane, Castleton (approx. 2.2ha/9 units)

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. The Council is satisfied that sufficient land has been allocated for residential development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.
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 133).

3.3 The Council’s highway department has highlighted constraints relating to access, due to the access route not being suitable for two way traffic and no footway/cycle way being available.

3.4 Consultation with Welsh Government’s Land Use Planning Unit regarding the Agricultural Land Classification Section confirmed that there is moderate probability of Best Most Versatile agriculture land subgrade 3a at this site. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.

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

3.5 The LDP proposes to allocate this site as part of the SP7(i) - Green Wedge – Newport and Cardiff. The Green Wedge allocation is within the Wentlooge Levels and is characterised by a flat open landscape. The area, including the Green Belt to the west, serves to protect the open character of the area and avoid the coalescence of the distinct communities of Newport and Cardiff. The site also falls within the proposed SLA designation on the Wentlooge Levels. The justification for its designation is set out in the Special Landscape Areas Background Paper – SD71.

3.6 Allocation of this greenfield site is not supported by the Council. Inclusion of this greenfield site, situated on the edge of a village does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area, and within the Eastern Expansion Area as part of a comprehensive sustainable development. 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 within the village boundary is not supported by the Council.

4 Rep 3074: Land at Ty Mawr Lane, Marshfield (approx. ??ha/5 units or community use)

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. The Council is satisfied that sufficient land has been allocated for residential development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.

Is the site free from constraints and deliverable?

4.2 The Council’s assessment of the site is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 – page 121 RAS(N)020).
4.3 Natural Resources Wales has raised objections to the potential allocation on this site for residential use as it is within the Gwent Levels – Rumney and Pesterstone SSSI and its allocation therefore has the potential to cause loss and/or degradation of the special interests. It also has potential adverse implications for the management and drainage system that supports the features of the SSSI, due to the interconnected nature of the drainage system and the way it is managed.

4.4 The site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15. The site is a greenfield site and its allocation would fail to meet the justification tests set out in paragraph 6.2 of TAN 15. The allocation of this site would therefore be contrary to national planning policy.

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

4.5 Inclusion of this greenfield site, situated on the edge of a village 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 within the village boundary is not supported by the Council.

4.6 With regards to use of the site for community facilities, consideration of such uses can be made under the provisions of Policy SP12, which allows for community facilities within or adjacent to the defined urban and village settlements. Such developments do not necessitate a change to the village boundary. Notwithstanding this, the proposed site is in a remote location from the majority of the village’s population and is not readily accessible. The suitability of the site for community facilities is therefore highly debatable.

5 **Rep 3842: Land at Blacktown, Marshfield (approx. 5.9ha/?? 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. The Council is satisfied that sufficient land has been allocated for residential development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.

**Is the site free from constraints and deliverable?**

5.2 The Council’s assessment of the site is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 – page 124 RAS(N)028).

5.3 The site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15. The site is a greenfield site and its allocation would fail to meet the justification tests set out in paragraph 6.2 of TAN 15. The allocation of this site would therefore be contrary to national planning policy.

5.4 Part of the site is within an NRW surface water flood area.
5.5 Consultation with Welsh Government’s Land Use Planning Unit regarding the Agricultural Land Classification Section confirmed that there is moderate probability of Best Most Versatile agriculture land subgrade 3a and 3b at this site. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.

5.6 The site is partially within an Archaeologically Sensitive Area (ASA). Development within the ASA will require developers to submit an archaeological impact assessment in support of their proposals. The Gwent Levels are a registered historic landscape.

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

5.7 The site falls within the proposed SLA designation on the Wentlooge Levels. 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.

5.8 The site is allocated within the Green Belt in the Adopted Unitary Development Plan. Green Belts are normally expected to have a life beyond that of one development plan. The Green Belt allocation is carried forward into the LDP. The purpose of the Green Belt is to maintain the openness and serves to prevent the coalescence of Newport and Cardiff taking into account the new development pressures in Cardiff in particular. It also serves to manage the urban form of Newport through creating a barrier which restricts the growth of Newport westwards and ensuring it remains a distinct urban area separate from Cardiff. Development of this site would be contrary to the objectives of the Green Belt allocation.

5.9 Inclusion of this greenfield site, situated on the edge of a village does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area, and within the Eastern Expansion Area as part of a comprehensive sustainable development. 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 within the village boundary is not supported by the Council.

6 Rep 3206: Land near Cambrian Drive, Marshfield (approx. 1.7ha/?? units)

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. The Council is satisfied that sufficient land has been allocated for residential
development to provide for the projected housing requirement: allocation of this site is not required to make the Plan sound.

Is the site free from constraints and deliverable?

6.2 The Council’s assessment of the site is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31 – page 136, RAS(N)050).

6.3 The Council’s Highway section has raised concerns in relation to the potential development of this site as there is no access to Cambrian Drive from the site. Church Lane is narrow in width with few passing places and not suitable for two way traffic. It has no footway/cycle and is therefore reliant on the private motor car. Access onto Marshfield Road will require the removal of the roadside hedge and trees. Any access would be located close to the Church Farm/Marshfield Road/St Mellons Road T junction. This gives rise to possible conflict and junction capacity issues. A Transport Statement and Road Safety Audit will be required.

6.4 The site is mainly located within Zone C1, as defined by the Development Advice Map (DAM) referred to in TAN 15: Development and Flood Risk (July 2004). The site is a greenfield site and its allocation would fail to meet the justification tests set out in paragraph 6.2 of TAN 15. Allocation of this site would therefore be contrary to national planning policy.

6.5 Part of the site is within an NRW surface water flood area.

6.6 The site is adjacent to an Archaeologically Sensitive Area (ASA). A precautionary approach to development would be adopted with developers required to submit an archaeological impact assessment in support of their proposals.

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

6.7 The site falls within the proposed SLA designation on the Wentlooge Levels. 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 Gwent Levels are a registered historic landscape.

6.8 The LDP proposes to allocate this site as part of the SP7(i) - Green Wedge – Newport and Cardiff. The Green Wedge allocation is within the Wentlooge Levels and is characterised by a flat open landscape. The area, including the Green Belt to the west, serves to protect the open character of the area and avoid the coalescence of the distinct communities of Newport and Cardiff.

6.9 Inclusion of this greenfield site, situated on the edge of a village does not reflect the underlying strategy of the Plan in focusing residential development on brownfield sites within the main urban area, and within the Eastern Expansion Area as part of a
comprehensive sustainable development. 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 within the village boundary is not supported by the Council.
Appendix 1 – Highway Comments on Planning Application 13/0541 – Chicken Factory Site

Date: 31/07/2013 16:06

Subject: 13/0541 - Packing Station, 30B, Marshfield Road, Cardiff, CF3 2UW

Packing Station, 30B, Marshfield Road, Cardiff, CF3 2UW

CONSTRUCTION OF 7NO. RESIDENTIAL UNITS, STRATEGIC ACCESS AND ASSOCIATED WORKS, INCLUDING

DEMOLOITION OF EXISTING FACTORY AFFECTING PUBLIC RIGHT OF WAY 399/32

The proposal gives cause for concern regarding the access between the public highway of Marshfield Road and the proposed development. The existing road lacks appropriate footways to assist the safe passage of pedestrians and narrows as it approaches the development site to a single lane car width for an approximate length of 60m, forward visibility on the approach to the narrowing from the farm is also heavily restricted which gives further cause for concern. The access onto Marshfield Road is not formalised in terms of kerb radii etc and is merely a footway crossover onto a private accessway.

The surfacing of the lane is concrete and shows signs of cracking and defects along its length, this is considered to be unsuitable for pedestrians and cyclists as many of the defects constituted trip hazards. The lane is also devoid of street lighting which further adds to its inappropriateness to serve a modern housing development.

Whilst I appreciate that the lane currently serves a small number of properties all of which access the lane much closer to Marshfield Road and generally within the wider section of the lane, it is felt that the introduction of 7 additional properties and associated vehicular and pedestrian movements including those of children would warrant a significant improvement to the overall design of the lane in terms of footway provision, surfacing, street lighting and measures to ensure the road narrowing will not prejudice the safe operation of the lane.

The development appears as an out-limb extension tagged onto an access that is considered inappropriate to meet the needs of the prospective residents. The long length of access lane which is not prospectively adoptable by the Local Authority without major upgrading works gives further cause for concern in terms of future maintenance.

I would also question how refuse would be collected from the new properties given the long length of unadopted access lane and the likelihood that the local authority would not agree to driving onto the private lane to collect refuse.

Notwithstanding the above comments, each property shall be provided with three parking spaces, garages must have internal dimensions of 6m x 3m. Details of refuse collection arrangements must be Conditioned. Although not prospectively adoptable the new road serving the plots should be constructed to an appropriate standard, full engineering details will be required in this respect.

A construction management plan must also be submitted and implemented. The CMP must detail site set up, traffic management, wheel wash and contractor parking. In view of my concerns I would oppose this application.
Regards

Martyn Richards

Senior Traffic and Development Officer

Streetscene

Newport City Council

Civic Centre