

MCC new Local Development Plan Consultation 2024

Shirenewton Community Council's response to MCC's proposed RDLP 2018-33 with reference to candidate site Land west of Redd Landes CS0232 1.76ha 4.35 acres (originally 10.5 acres)

SCC objects to the inclusion of this as a candidate site for the following reasons:

1. It lies outside the current defined village envelope. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. This site is part of that green belt and should remain for farming/agricultural use, and be excluded from the proposal to extend the current village development boundaries.
2. Site housing allocation excessive. Whilst we appreciate there is a need for some housing units to be added to Shirenewton we are concerned that, our villages being grouped in the 15 Tier 3 rural settlements, the new housing allocation for Tier 3 and Tier 4 jointly (41 settlements altogether) is 108 units giving an average 2.4 units per settlement which in our case might be fulfillable from repurposing small redundant buildings within our villages . This candidate site as proposed would add 26 houses, more than 10x the Tier 3 and 4 average, which we consider to be manifestly unfair. There are already planning consents for 15 houses, 4 of which would be affordable, as yet unbuilt and were the above site or any similar locally be given candidate status, the disproportionate impact of development would overwhelm our existing 280 households.
3. Heritage and Landscape. The RDLP candidate site submission asserts overall : *that the site performs well against the site search sequence. While the site is partly Best and Most Versatile (BMV) agricultural land, the RDLP asserts it performs better in this respect compared to other Candidate Sites within the area as most have higher proportions of BMV agricultural land, benefits from excellent access to the recreation ground, play area and recreation hall due to its location opposite the site, is within walking distance of the primary school and meets key policy requirements, including 50% affordable housing and net zero carbon homes.*

The assessment considers neither our heritage nor landscape. The core of Shirenewton is a conservation area and the proposed site is in view from it. The site occupies higher ground on the exit from the village and as such will be prominent in the field of view. This also exposes it to contamination of the dark sky aims of the Welsh Government. There is almost no street lighting in the village and even if the site was required to provide only low level lighting that will have overspill horizontally. That will then impact on the village outlook, and on bat movements.

A previously proposed candidate site which also lies to the west of the village but on the opposite side of the road is not progressing as significant concerns were raised in relation to heritage impact. Those should equally apply to this candidate site.

4. Recreation Ground limitations. We have a small recreation ground that does not provide all the facilities our villagers desire – the cricket square competes for space with the footballers, there is no hard path, nor are there any dedicated outdoor activities for our teenagers other than a single tennis court (which is not free to use). At least half of the candidate site, which was originally 10.5 acres could more usefully be dedicated

to the village for use as open space and those activities we sorely lack. In addition, the new homes families will have to cross the main exit route from the village to reach the recreation ground and a pedestrian crossing would be vital. The indicative contribution from the site developer towards recreational facilities is proposed at £26k based on current indicative cost. Our own costings show this would be significantly short in covering the cost of a hardpath and other facilities that we lack.

5. There is inadequate and unresolved infrastructure to support new development sites such as this and there is no realistic prospect that such services can be procured within the RDLP lifespan.

- 5.1. The Infrastructure Delivery Plan states *there are no issues with water supply network or foul flows being accommodated for this site at the Newport Nash WwTW* but this totally overlooks the existing sewerage disposal is by pipe to Mathern where fields are regularly flooded with raw sewerage primarily emanating from our villages and no repair works have yet resolved the issue. We have little expectation that any developer of the site will be able to overcome the issues since Welsh Water have singularly failed to do so despite ongoing attempts stretching back many years.

The issue is that many houses in the village have their surface water drainage discharging into the sewer. Whilst the existing pipe is claimed to meet demand that claim only holds good on the assumption that there is no rain. The fix is for all those existing houses having surface water drainage connected to the sewer to be connected to a separate system but the cost is beyond the Water Board's resources.

Under SUDS the newbuilds would discharge surface water to soakaways but this will not resolve the issue as the water from the site currently runs onto rejected candidate site CS0231 which regularly floods in winter.

Septic tanks for 26 new households will be expensive both in building costs and ongoing maintenance and will require regular discharge tankers adding to the traffic. It is irresponsible to add the new households to the main sewer the consequence of which will be to flood the fields in Mathern with even more effluent.

- 5.2. We have no doctors' surgeries, pharmacies, shops or cash machine within the villages nor within 20 minutes walking time.

- 5.3. The Infrastructure Delivery Plan on Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity... Our primary school is very well regarded and draws in pupils from the surrounding villages which are also planned to have housing development and consequent need for school capacity. Our residents' children have no assurance of being admitted since MCC changed its enrolment policy removing any preference of siblings without enlarging the school. Our primary school has no financial means now or prospectively to increase its capacity. There is therefore no guarantee the school would be able to educate our children. They would have to travel to Caldicott or Chepstow adding to the traffic. Chepstow provides secondary schooling but that involves travelling 6 miles in each direction. Cycling is not an option for secondary school age children on the road into Chepstow which is narrow and set at the national speed limit for much of its length.

- 5.4. We have no connecting_network of pavements in the village, so pedestrians are at

significant risk of harm from passing traffic while walking our roads and lanes. The proposed new pavement will only link the site to the pavement serving Redd Landes but that does not extend into the village centre. There is a gap of some 100m where the road is too narrow even for cars to pass, and there are no pavements or footpaths on the roads leading away from the centre. Although the gap section is within the 20mph speed limit, the majority of vehicles, including heavy goods and farm tractors, habitually exceed the limit by a significant margin. Pedestrians walk this section at their peril. Adding 26 families is not conducive to their wellbeing. Even crossing the road to reach the recreation ground will necessitate a light controlled pedestrian crossing.

- 5.5. Whilst we have five buses during the working day (only 4 on Saturdays) there are none in the evenings nor Sundays or bank holidays. We have no direct services to Caldicot or Severn Tunnel Junction rail stations nor The Grange or Gwent hospitals. Whilst the RDLP proposes a developer contribution to the cost of bus services there is no provision how that money is to be spent, whether to increase the existing service to cover evenings and weekends and/or provide new services, particularly to Severn Tunnel Junction, and we are concerned that the sum will simply be absorbed by the bus companies to underwrite existing services instead.
- 5.6. We have almost no SMEs to provide local employment, so travel is unavoidable for our non-WFH workers. Only FTTC is available which limits broadband speed, and speeds in excess of 100mb/s inside houses are not available in the village. The service is overhead and prone to fluctuation in adverse weather. We are not aware of any BT plans to bring us superfast broadband within the time frame of the RDLP, which reduces the appeal of WFH and encourages continuing use of the roads.
- 5.7. Car use is unavoidable and increasing our housing units only exacerbates congestion and pollution. The greater proportion of our residents are retired and would be unsafe on cycles even if they were willing to use them. In any case, the roads to Chepstow, Caldicot and Usk are narrow, hilly and winding, putting cyclists (and a fortiori pedestrians) at risk of serious harm from vehicles on these roads which, outside the village, are set at national speed limits. The RDLP spatial strategy seeks to provide an appropriate amount of housing development in those villages (identified as main rural settlements in Strategic Policy S2) that have reasonable access to services and/or public transport. We do not have reasonable access to services nor adequate public transport.
- 5.8. The villages do not have an adequate electricity supply to service the demands for individual charging points let alone new developments. The electricity board has yet to construct a new uprated for one end of the village and the other substation does not have sufficient capacity for the 3 phase supply necessary for home charging electric vehicles. there is no spare capacity available. There are no public charging points for electric vehicles.
Mobile telephone reception in the village fluctuates and is unreliable, and the smart meters so far fitted to our houses frequently fail to send data because of poor communication links leading to persistently inaccurate billing.
- 5.9. The Chepstow Beech Hill roundabout which is our link to the motorway network is already over congested and known for its poor air quality. Proposals for a Chepstow bypass for the A48 will not materialise until after 2033. The Land at Mounon Road Chepstow off the Beech Hill roundabout will add 146 houses with

inevitable consequences to pollution and congestion.

5.10 The RDLP summary speaks of affordable housing within exemplar mixed sustainable and well-connected places. There is no policy provision how planning officers are to determine the “mix”. In the absence of a policy, officers will be at risk of pressure from developers whose profit lies in building large houses. The plans for the existing new build site for 11 houses show a vast gulf between the outside and inside dimensions of the affordable houses in comparison to the executive style market houses. The draft RLDP appears to contemplate there will be a mix of affordable housing but in addition we consider 2 and 3 bedroomed market houses would provide a step onto the property ladder for our youngsters in order to retain them in our villages, and provision should be made for sheltered housing and bungalows for our disabled and elderly who wish to remain locally. There are many executive type houses in the village, and we have no need of any more. The RDLP should empower MCC to determine and impose the exemplar housing mix to suit our village, taking account of our villagers' needs and concerns. Minimum plot sizes should also apply so as to avoid creating the back to back Victorian terraces of old.

The term “exemplar” should be defined by policies setting minimum standards (such as the old Parker Morris requirements) for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars, including visitors and forecourt charging for electric vehicles, and van deliveries and for a lower building density which does not degrade new developments into the back to back the Victorian terraces of old.

Policies should provide that affordable housing development cannot proceed without a housing association and its funding being in place. Without this in place the sale and occupation of the affordable housing is at risk as will be the bankruptcy of the developer.

5.11 Policies should require market housing to be subject to the same conditions for occupation as affordable housing, so that it is reserved for families with connection to Shirenewton and Earlswood wards, such connection to be defined by length of residence or employment in our wards and/or generational family association.

In summary our objections are:

1. The site lies outside the current village envelope and fails to meet heritage and landscape policies both national and local.
2. The number of houses proposed will place an overwhelming and unfair burden on our village community in absorbing so many new families.
3. Car use is unavoidable and air pollution will inevitably rise.
4. Major infrastructure is lacking. The utility companies and our school have no spare capacity to service the new housing.
5. Policy S6 attempts to place the funding requirements for the necessary infrastructure on developers but runs the risk that the services will not be provided until the entire site development is completed, if ever, and will add significantly to the market house prices, to the detriment of our youngsters' desire to make their homes in the village
6. The development of the site presupposes there will be a housing association ready and fully funded to take on the affordable houses. Planning policy should require the ability of the selected housing association to proceed before the development can start.
7. Housing should be reserved for families with established connection to Shirenewton and Earlswood wards

8. In other words, the development is undeliverable in its scale, and phasing does not provide a solution.

Further objection :

General comments on the RLDP :

Lacks policy protection of Monmouthshire villages. The Future Wales 2040 policy preserves land north of the M4/M48 as green belt for preservation to maintain individual village identities for current and future generations. The proposed inclusion of multi-plot development sites on the edges of villages located in proximity to the M4/M48 motorways runs counter to this policy. Policies should protect village envelopes and allow only minor infill within the envelopes.

Policies should protect farmland where grey field sites can be identified.

Infrastructure is sorely lacking outside the main settlements. Most villages have no mains gas, electricity supplies are constricted and unable to meet rising demand for electric car charging, there is no priority for superfast broadband provision to tier 3 and 4 settlements and sewerage services through Mathern remain unfit for existing housing. Few of these settlements have a shop, school or surgery nor a bus service operating evenings and Sundays and bank holidays. The RLDP does not adequately address the need to make planning consent conditional on such infrastructure being fully upgraded prior to any development taking place. The risk is that initial plots on new developments will not be able to function as expected, raising the prospect of uncompleted sites and bankrupt developers unable to sell their newbuilds.

Laying the cost of upgrading the services onto developers only serves to increase the market price of the newbuilds. Where improved utility infrastructure benefits existing communities the associated costs should be expected to be met from council tax.

Exemplar housing and the housing mix are not defined terms. Policies should provide for set proportions of 2 and 3 bedroom market houses, and for bungalows and sheltered housing to offer a suitable choice of accommodation for disabled and elderly. Exemplar housing should set standards for accommodation and facilities of each housing unit, to allow for disabled access, adequate parking for cars and van deliveries and building density which does not degrade new developments into the back to back the Victorian terraces of old.

Policies should provide that affordable housing development cannot proceed without a housing association and its funding being in place.

The Policies should acknowledge that the residents of rural villages and their environs are dependent upon cars and van deliveries and will remain so for the life of the RLDP and beyond, and this should be incorporated in the design of residential plot layouts so that there is adequate hard parking and turning, allowing for electric cars to be charged on

those plots, for van deliveries to arrive and depart, and for unimpeded access by emergency vehicles.