AP9/2 - Representor no. 1965 (Monmouthshire Housing Association) to provide a plan and overlay plan illustrating the basis of pre-application discussion in relation to Policy HA1, with comments in response to be provided by Representor no. 3028 (Coldbrook Estates) within 2 weeks

Dear Inspector,

Representation (Rep (3028) in Relation to Policy HA1 - Land East of Abergavenny

For representor no. 1965 (Monmouthshire Housing Association) three plans have been provided:

1. A plan illustrating the basis of pre application discussion (as requested)
2. An overlay plan illustrating the basis of pre-application discussion in relation to Policy HA1 (as requested)
3. An emerging concept masterplan: illustrating how the Awen (MHA) site can be brought forward as a Policy HA1 compliant, standalone development

Pre application

The Indicative Masterplan (AP9/2b) submitted by Monmouthshire Housing Association (MHA) alongside the pre app process includes land outside the control of MHA. The pre app enquiry was submitted in January 2025. The preferred composition of the MHA masterplan for the Land East of A465, Abergavenny was to maximise the use of CS0213 and only use CS0293 (Coldbrook Estates) as much as considered absolutely necessary. The masterplan for the pre app was the MHA proposal to fulfil policy HA1.

Policy HA1

For MHA as well as the two plans requested by the Inspector a third plan has been submitted, An emerging concept masterplan: illustrating how the Awen (MHA) site can be brought forward as a Policy HA1 compliant, standalone development. This third plan was submitted after the deadline set by the Inspector for a response to AP9/2. As per the plan for the pre app the comments regarding the emerging concept masterplan should be considered within the context of the LDP Manual advice and guidance. In addition to which Strategic Policies S3 and S8 are relevant.

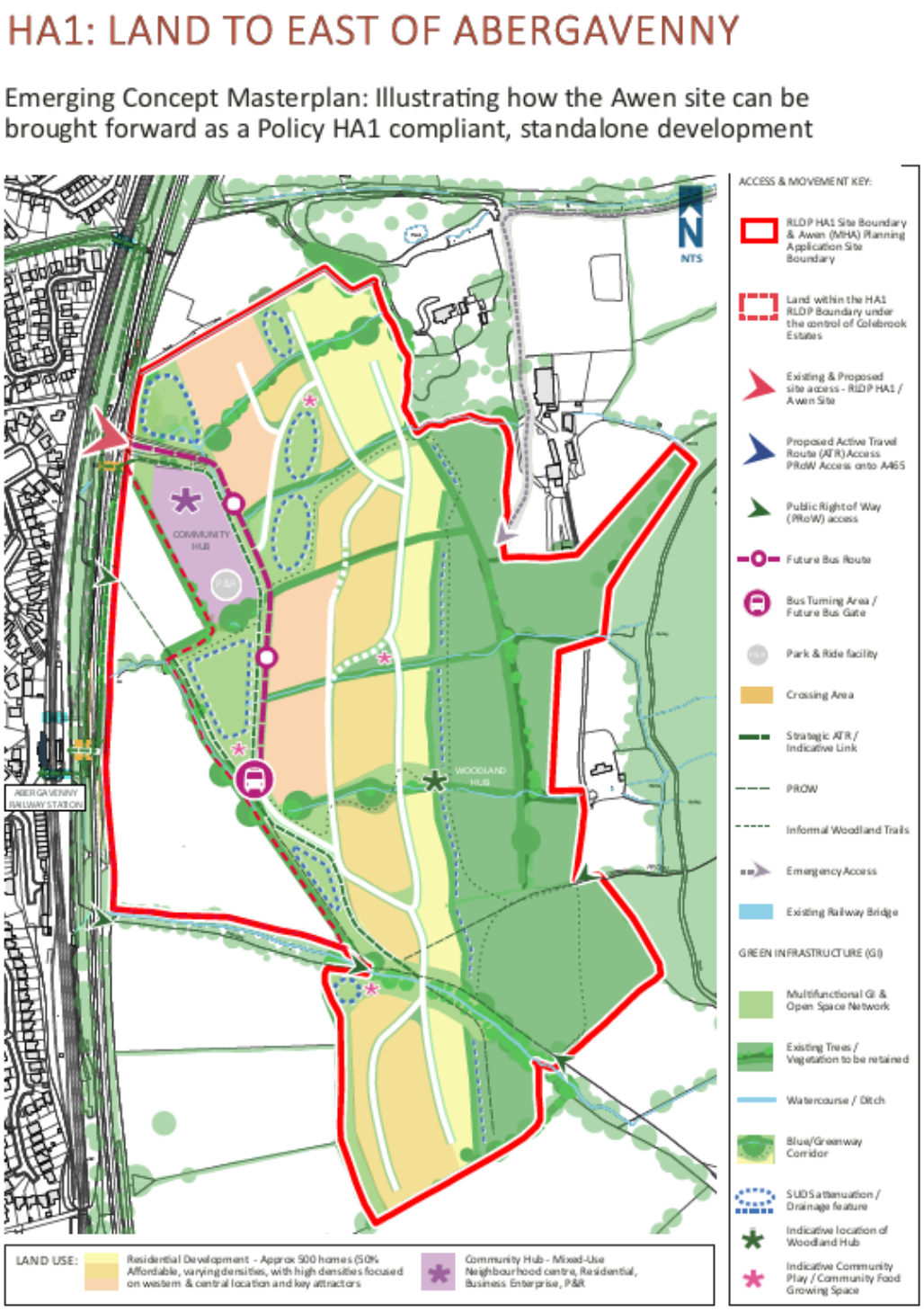
Policy HA1 allocates approximately 35.9 hectares for a mixed-use urban extension comprising around 500 dwellings (including 50% affordable housing), employment land, a neighbourhood centre, park and ride facilities, active travel infrastructure and substantial green infrastructure. The policy expressly requires the preparation of a masterplan establishing the key design and placemaking principles for the site.

The Council has confirmed (AP9/5) the second sentence of introductory text (in dark blue box) for HA1 will read as follows: ‘Development of the site must accord with the following parameters, placemaking principles and development requirements, which must be delivered in an appropriately phased manner and be formally tied to planning consents.’

Furthermore, the site must comply with the Placemaking Principles included in Policy HA1. The allocation is therefore founded upon comprehensive site-wide planning and delivery.

The concept masterplan is described as illustrating how the Awen site can be brought forward independently despite land within the allocation controlled by Coldbrook Estates not forming part of the preferred development proposal.

Extract of MHA's Emerging Concept Masterplan



Shortcomings as per HA1 with the concept masterplan include:

Sustainable Communities

The emerging concept masterplan doesn't show:

1. How a minimum 1 hectare of B1 Use Class will be accommodated
2. Connections from the park & ride facility to serve Abergavenny Railway Station
3. Active travel connections to/from the site to the Railway Station and Abergavenny
4. The provision of an appropriate design response and interface between the western edge of the development and the A465 corridor that respects the importance of the visual connectivity between the site and existing settlement and is in keeping with the distinct character of Abergavenny

Green Infrastructure, Landscape, and Nature Recovery

The emerging concept masterplan doesn't minimise impact and retain the field pattern and hedgerows along the eastern boundary.

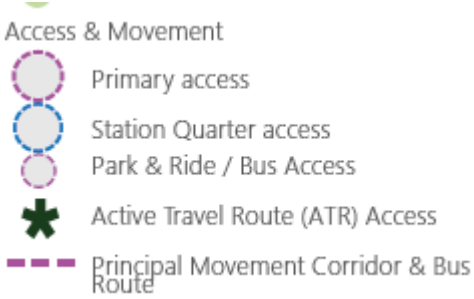
Sustainable Travel & Highways

1. The emerging concept masterplan doesn't include changes to the character and environment of the A465 to provide safe and accessible crossings and means of access(s) and appropriate crossings over the railway line. The masterplan submitted for the pre app includes existing A465 downgrading/public enhancement. Shifting the A465 from a trunk road to a street is one of the cornerstones of extending Abergavenny eastwards.
2. The amended policy reads The provision of a secondary access. Emergency secondary access on to Garth Road. No secondary access is shown. There is an emergency access shown to/from the B4233 some distance away.
3. Provision for good quality, safe, legible and accessible pedestrian and cycle linkages to key access points including linkages to the local schools, Abergavenny town centre and bus transport services is not shown on the emerging concept masterplan
4. One of the two points of connection to the A465 for a bus link as shown on the pre app plan is missing from the emerging concept masterplan.

Other comments:

1. SUDs attenuation/drainage features are shown on the emerging concept masterplan but it's not clear how SUDs would operate to take water off site.
2. The Indicative RLDP Masterplan shows the neighbourhood centre and B1 zone in close proximity to the railway station

3. The Indicative RLDP Masterplan shows four points of access. The pre app masterplan shows three points of access:



4. Delivery and viability detail for the emerging concept masterplan has not been made available for assessment
5. Key stakeholders such as WG Highways, Network Rail, Natural Resources Wales, MCC (highways, drainage, ecology, GI) Abergavenny Civic Trust, Design Commission for Wales (given previous engagement) should be consulted to allow comments regarding the emerging concept masterplan to be provided. Whilst the emerging concept masterplan is presented within the proposed allocation boundary it is a significant deviation from the RLDP Masterplan that was informed via consultation with key stakeholders.

This creates uncertainty as to whether Policy HA1 can be delivered in the comprehensive manner envisaged by the RLDP. In particular it is unclear:

- How comprehensive development of the allocation would be secured;
- Whether the infrastructure assumptions underpinning the allocation remain valid; and
- Whether all policy requirements can be delivered across the site as envisaged by the RLDP.

Indeed, the submission of the Abergavenny East Strategic Site Development Framework masterplan (1909_Abergavenny-East-MHA-Pre-App-Indicative-Masterplan) as part of the pre-application package suggests the full policy requirement cannot be met without the inclusion of the Coldbrook land. These concerns are relevant to Soundness Test 3, which requires a robust evidence base demonstrating that allocations are suitable and deliverable.

Conclusion

The principal concern is that Policy HA1 requires the allocation to be as a comprehensive strategic allocation, whereas the emerging concept masterplan seek to demonstrate policy compliance through development of only part of the allocated site. However, it is considered that the masterplan fails to fulfil the requirements of Policy HA1, placemaking objectives and the LDP Manual.

In the absence of an agreed masterplan covering the entirety of the allocation, it has not been demonstrated that:

1. The allocation will be delivered comprehensively across all land within HA1;
2. The required mixed-use elements can be delivered in full;

3. The strategic location of the site in close proximity to Abergavenny railway station will be realised;
4. Infrastructure and transport interventions remain deliverable as assumed by the Council; or
5. The allocation satisfies the deliverability assumptions underpinning the RLDP.

It is therefore considered that a boundary amendment should be proposed to HA1 as per the masterplan advocated by Coldbrook Estates (extract below) to ensure the requirement of Policy HA1, placemaking objectives and the LDP manual are met.

COLEBROOK CONCEPT MASTERPLAN

Alternative Concept Masterplan
[Source: Colebrook Estates]



1. Attenuation ponds at lowest point on the site - creates attractive green edge to the main road.
2. Development blocks work with the contours of the site to help minimise engineering and retaining elements.
3. Site Access from A465.
4. Non ticketed access to Abergavenny town centre.
5. Ticketed access to train station for residents and Park & Ride.
6. New local centre, with commercial and community uses creates entrance space and strong frontage along A465.
7. Pedestrian and cycle routes link into the wider area via existing and established connections.
8. Existing PROWs retained and incorporated into the scheme.
9. Development does not extend beyond the 110m contour line to minimise visual impact.
10. Existing trees and hedgerows wherever possible.
11. Play spaces integrated into swathes of the land to create a green focused development.