



CARNEYSWEENEY

# Land at Mounton Road, Chepstow



## Environmental Statement Volume 1: Written Statement

On behalf of Barwood Development Securities Ltd  
October 2025

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# 1 INTRODUCTION

## 1.1 Preamble

- 1.1.1 This Environmental Statement (ES) has been prepared on behalf of Barwood Development Securities Ltd (“the applicant”) in support of an outline planning application with all matters reserved apart from access, for the development of a sustainable mixed-use neighbourhood at Land at Moun-ton Road, Chepstow. The proposal comprises residential development of up to 146 dwellings together with a hotel, residential care home, mobility hub (providing active and sustainable travel options and space for remote working), highway access, provision of green infrastructure, open space, on site play provision, drainage attenuation and infrastructure works.
- 1.1.2 The ES has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended).

## 1.2 Legislative Framework

- 1.2.1 Environmental Impact Assessment (EIA) is the process of compiling, evaluating and presenting all likely significant environmental effects of a proposed development and ensures such effects are fully understood. The purpose of an EIA is to provide the local planning authority, when determining a planning application, with sufficient information to allow it to properly assess the environmental effects of a scheme.
- 1.2.2 The assessment process is designed to help produce an environmentally sensitive scheme. Detection of potentially significant adverse environmental impacts will enable appropriate mitigation measures to be built into the site layout and masterplan design at an early stage.
- 1.2.3 The legislative background for EIA originated with the European Community Directive on ‘The Assessment of the Effects of Certain Public and Private Projects on the Environment’ (85/337/EEC) as amended by Directive 97/11/EC. These directives are implemented for the purpose of determining planning applications via the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 which came into force on 16th May 2017.
- 1.2.4 The above Regulations establish the criteria which determine whether EIA is necessary or not and identify the nature and scale of the projects and their applicability to be determined as Schedule 1 or Schedule 2 projects. Schedule 1 projects require EIA in every case. Schedule 2 projects may or may not require EIA dependent on whether the project in question is likely to give rise to significant environmental effects by virtue of factors such as nature, size or location.
- 1.2.5 The proposed development does not fall within Schedule 1 of the Regulations. The proposed development does however fall within paragraph 10 (b) (Urban Development Projects) of Schedule 2 of the 2017 Regulations. Part 10(b) relates to Urban Development Projects including more than 1 hectare of urban development which is not dwellinghouse development (i); more than 150 dwellings (ii); or where the overall area of the site exceeds 5 hectares (iii). For such Schedule 2 Developments the 2017 Regulations require that Environmental Impact Assessment (EIA) be undertaken where the development is likely to have ‘significant effects on the environment by virtue of factors such as its nature, size or location’. Accordingly, it has been necessary to establish if the development is likely to have a significant effect on the environment.
- 1.2.6 Schedule 3 of the 2017 Regulations sets out criteria which must be taken into account in determining whether a scheme is likely to have significant effects relating to the characteristics of the development which include:



- a) the size and design of the whole development;
- b) cumulation with other existing development and/or approved projects;
- c) the use of natural resources in particular land, soil, water and biodiversity;
- d) the production of waste;
- e) pollution and nuisances;
- f) the risk of major accidents and/or disasters which are relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- g) the risks to human health (for example due to water contamination or air pollution).

### 1.3 Screening and Scoping Opinion

- 1.3.1 A formal Screening Opinion Request was submitted to Monmouthshire County Council (MCC) on 3<sup>rd</sup> October 2024 (ref: DM/2024/01242). The formal Screening Opinion was issued by MCC on 21<sup>st</sup> November 2024 and confirmed an Environmental Statement (ES) is required to support a planning application for the development proposals. A copy of the LPA's Screening Opinion is included at **Appendix 1.1**.
- 1.3.2 Following receipt of the Screening Opinion, a Scoping Opinion Request was submitted to MCC on 30<sup>th</sup> January 2025 (ref: DM/2025/00133). MMC's formal Scoping Opinion was issued on 4<sup>th</sup> April 2025 which confirmed the technical scope of the ES. All of the matters raised within the Scoping Opinion have been duly considered and addressed in this ES. A copy of the LPA's Scoping Opinion is included at **Appendix 1.2**.

### 1.4 Structure of the Environmental Statement

- 1.4.1 The ES consists of three documents:
  - Main text (this document) providing a description of the scheme and results of the assessments subdivided by topic.
  - Figures and Appendices containing technical data to support the text.
  - A Non-Technical Summary (NTS) providing a brief description of the scheme and a broad summary in layman's terms of the significant issues and impacts likely to arise, along with proposals for mitigation measures.
- 1.4.2 This document is divided into the following chapters:
  1. Introduction
  2. Site Description and Project Proposals
  3. Planning Policy Context
  4. Ecology
  5. Landscape and Visual Character
  6. Built Heritage

### 1.5 The Assessment Team and Statement of Expertise

- 1.5.1 The Environmental Impact Assessment has been managed and led by CarneySweeney, taking into account all relevant information provided by the Applicant and design team.



- 1.5.2 Regulation 17 (4) a) and b) of the 2017 EIA Regulations requires EIA to be prepared by competent experts who have relevant expertise to ensure the completeness and quality of the statement and contain a statement describing the expertise or qualification of the person who prepared the ES. As such, the following Statement of Expertise is provided in **Table 1.1** below:

**Table 1.1 ES Assessment Team and Relevant Qualifications**

ES Chapter	Main Author/Contributor	Qualifications
1: Introduction	Emma Fortune (Director – Planning) CarneySweeney	BSc (Hons), MSc, MRTPI
2: Site Description and Project Proposals	Emma Fortune (Director – Planning) CarneySweeney	BSc (Hons), MSc, MRTPI
3: Planning Policy Context	Emma Fortune (Director – Planning) CarneySweeney	BSc (Hons), MSc, MRTPI
4: Ecology	Kate Henson (Director) The Environmental Dimension Partnership Ltd	BSc(Hons), PhD, MCIEEM
5: Landscape and Visual Character	Joe Hall (Principal Landscape Architect) The Environmental Dimension Partnership Ltd	BA (Hons), PGDipLA, CMLI
6: Built Heritage	Andrew Crutchley (Director) The Environmental Dimension Partnership Ltd	BA (Hons), PG Dip (Oxon), MCIfA



## 2 SITE DESCRIPTION AND DEVELOPMENT PROPOSALS

### 2.1 Site Description

- 2.1.1 The site covers an area of approximately 12.8ha and is located to the west of Chepstow Town Centre. The site currently comprises agricultural land and is bounded by Mounton Road to the north, the A48 to the south, the A466 (Wye Valley Link Road) to the east and St Lawrence Lane to the west. Surrounding land uses to the north and east of the Site comprise predominantly residential dwellings. Open fields bound the site to the west, and St Lawrence House, a Grade II Listed Building is located on the site's northern boundary.
- 2.1.2 The site is currently accessed from Mounton Road. No public rights of way (PRoW) cross the site, however, there is a PRoW network in the vicinity of the site, including PRoW 355/3/3 which can be accessed from Mounton Road near the site's north-western corner. This PRoW in turn provides connections to the wider PRoW network to the north-west and south-west of the Site facilitating access through the countryside beyond Chepstow. National Cycle Network (NCN) Route 4 runs along the northern (Mounton Road) and eastern (Wye Valley Link Road (A466)) boundaries of the site.
- 2.1.3 The land within the site slopes relatively gently downwards from north to south, from c.96m above Ordnance Datum (aOD) to c.77m aOD, and also from east to west in a similarly gentle fashion; i.e. from 96m aOD downwards to c.88m aOD.
- 2.1.4 The Welsh Government's Predictive Agricultural Land Classification (ALC) 2 Map indicates that the site comprises a mixture of Grades 3b, 3a and 2 agricultural land quality with Grades 2 and 3a being classified as 'best and most versatile'.
- 2.1.5 According to the Flood Map for Planning, the site is entirely located within Zone 1 and whilst the wider area has a history of flooding, there is no history associated with the site itself. The site is accordingly at low to negligible risk of flooding from all sources.
- 2.1.6 With respect to statutory designated sites, no part of the site is covered by any statutory nature conservation designations. The River Wye Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) are located some distance to the east. The site is not located within a Phosphorus Sensitive Riverine SAC Catchment Area.
- 2.1.7 There are no designated heritage assets such as world heritage sites, scheduled monuments, listed buildings, registered parks and gardens or registered battlefields within the site although St Lawrence House, a Grade II Listed Building is located adjacent to the north of the site (Cadw ID: 2606) and Mathern Conservation Area (which covers a very large area including the Wyelands Registered Park and Garden (RPG)) extends as far to the north as the southern edge of the A48 south of the site's southern boundary.
- 2.1.8 The site contains no statutory landscape designations and lies some 180m outside of the Wye Valley National Landscape (NL).

### 2.2 The Development Proposals

- 2.2.1 The application proposals seek to deliver a new sustainable mixed-use neighbourhood comprising approximately 146 residential dwellings, a hotel, residential care home and a mobility hub (providing active and sustainable travel options and space for remote working) highway access, provision of green infrastructure, open space, on site play provision, drainage attenuation and infrastructure works.





- 2.2.2 The development proposals will form a natural and well-integrated extension to the existing town of Chepstow and as such, the development proposals have been informed by an extensive constraints and opportunities exercise. This exercise has also been supported by a suite of technical assessments to ensure that the proposed development principles can fully respond and integrate into the site's contextual features such as St Lawrence House, proximity to the A466 and Highbeech roundabout, landscape and ecological features.
- 2.2.3 The development will make provision for both market and affordable housing in a mix of house types and styles designed for a diverse population including first time buyers, families and suitable for older and disabled persons. The design of the houses will also reflect the character of the area and embrace good practice design.
- 2.2.4 The residential care homes/supported living accommodation is currently positioned on land in the northwest of the Site and could provide up to c.60-80 bedrooms with the proposed hotel located opposite adjacent to the Wye Valley Link Road. It is proposed that the hotel could also accommodate c.60-80 bedrooms.
- 2.2.5 It is proposed that the mobility hub could support active travel priorities for the site. Ideas for this space include a pedal and electric bike/scooter hire shop and space for remote working.
- 2.2.6 Extensive new areas of high quality public open space will be provided within the site which will contain children's play areas and spaces linked by new green and blue infrastructure, sustainable attenuation and the potential for significant biodiversity net benefit.
- 2.2.7 Vehicular access to the site will be provided via a new junction via the Wye Valley Link Road based on a design and access strategy that has been developed in consultation with the MCC highway officers.
- 2.2.8 Access for pedestrians and cyclists will be provided from Mounton Road, Wye Valley Link Road, A48 and St Lawrence Lane. These routes will form part of a sustainable movement strategy that aims to facilitate a high-quality network of links provided throughout the Site to ensure that all key locations are highly accessible by walking and cycling and that the development creates a permeable network connecting the active travel access locations and uses onsite through convenient and direct routes. All new infrastructure will be designed with regard to Welsh Travel Act Guidance.
- 2.2.9 The development proposals will form a natural and well-integrated extension to Chepstow and seek to create a high high-quality place and integrated community, with a range and choice of new homes to meet a wide range of local needs; support and boost the local economy; support the climate change agenda; and support the well-being of current and future generations to come.
- 2.2.10 A series of parameter plans which illustrate the proposed development in respect of land use and access, scale, and green infrastructure are included at **Appendix 2.1**. An illustrative framework masterplan for the site is included at **Figure 2.1**.

## 2.3 Aims and Objectives of the Development Proposal

- 2.3.1 The development proposals represent an opportunity to contribute to the delivery of housing (including affordable housing) in Chepstow, on a site which is promoted by Monmouthshire County Council for residential development in the Replacement Local Development Plan (which was submitted to Welsh Government and Planning and Environment Decision Wales (PEDW) for independent examination on 7<sup>th</sup> November 2025).
- 2.3.2 The illustrative framework masterplan for the site seeks to provide a coherent and landscape led development which not only responds to the site's existing features, proximity to the adjacent listed building, topography, landscape and ecological assets and constraints but it also responds to its location as a strategic gateway site into Chepstow and seeks to fully integrate with its surroundings.



2.3.3 The development proposals incorporate the following key design principles:

- The proposed commercial element of the development, comprising a hotel, care home, and mobility hub is located at the north eastern part of the site, for connectivity with Chepstow town centre and the A466. Higher densities at this part of the site will enhance a sense of arrival into the site, with the hotel and care home being up to 3 storeys in height whilst the mobility hub will be 1 storey;
- The residential development is arranged in zones whereby the scale of development near the commercial uses, and along the frontage to A466 road is greater, at 2.5 storeys to enhance the sense of place at these important focal areas. For the remainder of the Site residential development will be 2 storeys in height;
- Provision of a range and choice of new homes in Chepstow, including the provision of affordable units of appropriate types, sizes, densities and scale across the site;
- A large community parkland will be provided in the west part of the site to provide public open space, retain the historic value associated with the setting of St Lawrence House and provide an extensive landscape buffer from the green wedge to the west;
- The siting and orientation of the built development, together with the landscape scheme seek to provide long distance views to the Severn Estuary to the south and parkland to the west to create visual interest and a strong sense of place; whilst also protecting the setting of St Lawrence House Listed Building and green wedge;
- Maximising movement opportunities of the site's unique position at important arrival points into Chepstow from the north, south and west. The internal site layout and site access arrangements will be designed in a manner which facilitates walking and cycling, incorporating the surrounding public rights of way footpath network. A new multi modal road alignment will provide easier movement options and enhanced pedestrian and cyclist access alongside the carriageway;
- Provision of a community orchard for food growing activities, delivering health, wellbeing, landscape and amenity benefits;
- Additional parcels of open space throughout the development, including a play area for children in the central part of the site;
- Provision of green and blue infrastructure for integrated sustainable drainage and landscape features; and
- Opportunities to retain, enhance and provide ecological habitats are proposed to integrate with the existing woodland to the north and south west of the site, which will protect and enhance the biodiversity of the area.

## 2.4 Alternatives

- 2.4.1 The application site is identified for a strategic, residential-led mixed use development within MCC's Replacement Local Development Plan (RLDP) which was submitted to Welsh Government and PEDW for independent examination on 7<sup>th</sup> November 2025 (Regulation 22).





- 2.4.2 Through the RLDP process, MCC has followed a process of identifying, assessing and selecting land for potential future development, a process which has introduced and then filtered out sites during the course of the LDP Review. This process progressed from the objective and 'policy off' appraisal of potentially suitable and available sites (through the call for candidate sites and subsequent Strategic Assessment of Land Availability) towards a more strategy-led selection of the best-performing sites, at appropriate locations and of appropriate scale to deliver the envisaged strategy and to achieve strategic objectives for Monmouthshire County as a whole.
- 2.4.3 The Council's Candidate Site Assessment Report (2024) sets out the Council's approach to identifying and assessing potential spatial strategy options and how the development strategy was selected to meet the Council's future land supply requirements.
- 2.4.4 Through undertaking this rigorous site selection process, the Council has confirmed that it considers that Strategic Site Allocation HA3: 'Land at Mounton Road, Chepstow' (the application site) to be in accordance with the LDP Review development strategy.
- 2.4.5 MCC has therefore undertaken its own site assessments, whilst considering all alternative development opportunities and concluded that Land at Mounton Road is suitable for future development.
- 2.4.6 The design proposals for the site's development have evolved over time and have been informed by discussions with the Council, Design Commission for Wales, key stakeholders, as well as a variety of comprehensive technical assessments and surveys.
- 2.4.7 Early engagement with the Council Officers guided the key principles of the proposal such as the use, form and quantum of the mixed use development, to include a hotel use, care home, c. 146 homes and a community parkland area.
- 2.4.8 On 4<sup>th</sup> October 2023, the proposals were presented to the Design Commission for Wales (DCfW) together with Council Officers and other local stakeholders including town councillors.
- 2.4.9 Originally, the proposal was for development blocks across the site with an open green space south of St Lawrence House and housing at the western edge, with a separate access from Mounton Road. As the commercial uses came into consideration, various options were considered for their location, including at the western and southern parts of the site.
- 2.4.10 Following feedback from the DCfW, the commercial uses were relocated to the northeastern part of the site, to benefit from accessibility from the A466; and a more significant and dramatic entrance to the parkland was provided by incorporating a large tree lined avenue to the entrance.
- 2.4.11 Overall, design philosophy for the site ensures that the site will deliver a high-quality sustainable development in an integrated and co-ordinated manner in conformity with the relevant policies of the LDP Review, and in full cooperation with key stakeholders. In particular, the proposed site layout, density, built form and character areas have been designed to reflect Chepstow itself, its surrounding landscape and historic features.



## 3 PLANNING POLICY CONTEXT

### 3.1 Introduction

- 3.1.1 This chapter sets out the planning policy and legislative context against which the development proposal will be considered. It provides a broad overview of the context relating to the development proposal, with more topic specific policy and legislation being referred to in individual chapters as necessary.
- 3.1.2 An analysis of the development proposal having regard to the planning policy and legislative context is provided in the Planning Statement that accompanies the application.

### 3.2 Development Plan

- 3.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions made under the planning acts should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the statutory Development Plan at the time of writing, consists of the Future Wales: The National Plan 2040 (February 2021) and the Monmouthshire County Council (MCC) Local Development Plan (LDP) (February 2014).
- 3.2.2 It is however material to note that since the adoption of the MCC LDP was in 2014 and in accordance with Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015), the Local Plan is currently under review. The Monmouthshire RLDP was submitted to Welsh Government and Planning and Environment Decision Wales (PEDW) for independent examination on 7<sup>th</sup> November 2025 (Regulation 22), meaning the Plan can now be given weight in the determination of applications.

### 3.3 Future Wales: The National Plan 2040 (February 2021)

- 3.3.1 Future Wales (FW) places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of its decision-making processes.
- 3.3.2 A number of challenges and opportunities are identified for Wales nationally, challenges including climate change and Covid 19 and opportunities including progress towards a low carbon economy, renewable energy generation and abundance of natural resources. A changing society, the need for good quality housing, prosperity and increasing resilience in the economy as well as improved connectivity are also identified as drivers for the next 20 years.
- 3.3.3 There are 11 outcomes set out in Future Wales which collectively are a statement of where Wales ‘wants to be’ in 20 years. These 11 outcomes envisage a Wales where people live:
- and work in connected, inclusive and healthy places;
  - in vibrant rural places with access to homes, jobs and services;
  - in distinctive regions that tackle health and socio economic inequality through sustainable growth;
  - in places with a thriving Welsh Language;
  - and work in towns and cities which are a focus and springboard for sustainable growth;
  - in places where prosperity, innovation and culture are promoted;
  - in places where travel is sustainable;
  - in places with world class digital infrastructure;
  - in places that sustainably manage their natural resources and reduce pollution;



- in places with biodiverse, resilient and connected ecosystems; and
- in places which are decarbonised and climate resilient.

3.3.4 Future Wales policies that are of particular relevance to the development proposals include:

- Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking, which states the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.
- Policy 7 – Delivering Homes including Affordable Homes, to meet local and regional needs; outlining that the planning system must facilitate the provision of additional market and affordable housing.
- Policy 9 – Resilient Ecological Networks and Green Infrastructure, which recognises the need to maximise the use of green infrastructure and nature-based solutions as part of shaping urban growth, supporting rural communities and responding to the twin challenges of addressing the climate emergency and reversing biodiversity decline.

### 3.4 Monmouthshire Local Development Plan (adopted February 2014)

3.4.1 According to the adopted Local Plan Proposals Map, the application site lies on unallocated white land outside, but adjacent to the defined settlement development limits of Chepstow. The site is however shown to form part of the Green Wedge (defined under Policy LC6) and is also located in a Mineral Safeguarding area for Limestone (defined under Policy M2).

3.4.2 The site in policy terms is considered to be situated in the open countryside whereby Policy LC1 (New Built Development in the Open Countryside) outlines that there is a general presumption against new built development in the open countryside unless justified in exceptional circumstances. Policy SD1 (The Spatial Distribution of New Housing Provision) however confirms that the main focus of new housing development will be within or adjoining the main towns of Abergavenny, Chepstow and Monmouth. Policy S8 (Enterprise and Economy) support development proposals which seek to deliver sustainable economic growth particularly when they enable the continued development of existing key economic sectors, including tourism (criterion a refers).

3.4.3 Policy S2 outlines that MCC will make provision to meet the requirement for 4,500 residential units in the plan period (2011-2021). Meanwhile Policy S4 (Affordable Housing Provision) - would require 35% of the total number of the dwellings on site to be affordable.

3.4.4 As above, the site is currently located within the Green Wedges which Policy LC6 confirms is to prevent the coalescence of Chepstow, Pwllmeyric and Mathern. The site is also located within a Mineral Safeguarding Area for Limestone whereby Policy M2 outlines that any proposals for permanent development uses within identified mineral safeguarding areas will not be approved unless:

- i) The potential of the area for mineral extraction has been investigated and it has been shown that such extraction would not be commercially viable now or in the future or that it would cause unacceptable harm to ecological or other interests; or
- ii) The mineral can be extracted satisfactorily prior to the development taking place; or
- iii) There is an overriding need for the development; or
- iv) The development comprises infill development within a built up area or householder development or an extension to an existing building.

4.0.1 Other LDP policies of relevance to the development proposals for the site include:

- S5 (Community and Recreation Facilities)



- S7 (Infrastructure Provision)
- S12 (Efficient Resource Use and Flood Risk)
- S13 (Landscape, Green Infrastructure and the Natural Environment)
- S15 (Minerals)
- S16 (Transport)
- S17 (Place Making and Design)
- SD4 (Sustainable Drainage)
- EP1 (Amenity and Environmental Protection)
- EP2 (Protection of Water Sources and the Water Environment)
- EP3 (Lighting)
- EP5 (Foul Sewage Disposal)
- DES1 (general design considerations)
- MV1 (Proposed Developments and Highway Considerations)
- MV2 (Sustainable Transport Access)
- LC5 (Protection and Enhancement of Landscape Character)
- GI1 (Green Infrastructure)
- NE1 (Nature Conservation and Development)
- EP1 (Amenity and Environmental Protection)
- MV2 (Sustainable Transport Access)

### 3.5 Other Material Considerations

#### Planning Policy Wales Edition 12 (February 2024)

- 3.5.1 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 such as the Socio-economic Duty.
- 3.5.2 PPW identifies five key planning principles aimed at achieving the right development in the right place. These are: Growing our economy in a sustainable manner; Making best use of resources; Facilitating accessible and healthy environments; Creating and sustaining communities; and Maximising environmental protection and limiting environmental impact.
- 3.5.3 Placemaking remains at the core of PPW12 whereby policy topics are clustered around the four themes of: Strategic and Spatial Choices, Productive and Enterprising Places, Distinctive and Natural Places and Active and Social Places which each contribute individually to placemaking. Importantly, these themes draw together the linkages between planning policies to make it clear how individual components contribute to placemaking.
- 3.5.4 PPW Chapter 3 (Strategic and Spatial Choices) refers to 'Good Design Making Places Better'. Paragraph 3.3 states that good design is fundamental to creating sustainable places where people want to live, work and socialise. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how the space is used, how buildings and the public realm support this use, as well as construction, operation, management, and its



relationship with the surrounding area. Good design should consider: Environmental Sustainability; Movement; Access; Character; and Community Safety.

- 3.5.5 PPW Chapter 4 (Active and Social Places) seeks to promote social, economic, environmental and cultural well-being by providing well-connected cohesive communities. This policy theme covers transport, housing, retail and commercial development, community facilities and recreational spaces.
- 3.5.6 PPW Chapter 5 (Productive and Enterprising Places) explains that Productive and Enterprising Places are those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle the climate emergency. This is done by making them: easy to walk and cycle to and around; accessible by public transport; minimising the use of non-renewable resources; and using renewable and low carbon energy sources.
- 3.5.7 PPW Chapter 6 (Distinctive and Natural Places) covers environmental and cultural components of placemaking. These components are complementary of those of the Active and Social and Productive and Enterprising themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes. The Distinctive and Natural Places theme covers historic environment, landscape, biodiversity, geodiversity and habitats, coastal characteristics, air quality, soundscape, water services, flooding and other environmental (surface and sub surface) risks.
- 3.5.8 Section 6.1 relates to the Historic Environment and paragraph 6.1.10 covers Listed Buildings and outlines that there should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting or any features of special architectural or historic interest which it possesses.
- 3.5.9 Section 6.2 relates to Green Infrastructure and defines it as “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”.
- 3.5.10 Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places.
- 3.5.11 Paragraph 6.4.21 establishes that planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.

### Technical Advice Notes (TAN)

- 3.5.12 The following TANs are also relevant to the development proposals:
  - TAN 2: Affordable Housing (2006)
  - TAN 5: Nature Conservation and Planning (2009)
  - TAN 11: Noise (1997)
  - TAN 12: Design (2016)
  - TAN 13: Tourism (1997)
  - TAN 15: Development and Flood Risk (2004)
  - TAN 18: Transport (2007)
  - TAN 20: Planning and the Welsh Language (2017)



- TAN 23: Economic Development (2014)
- TAN 24: The Historic Environment (2017)

### Monmouthshire County Council Replacement LDP

- 3.5.13 The Council is currently in the process of reviewing the LDP and the Draft RLDP was published in October 2024. On 7<sup>th</sup> November 2025, MCC submitted the RLDP to Welsh Government and Planning and Environment Decision Wales (PEDW) for independent examination. The Submission RLDP sets out the Council's development strategy for meeting growth and development needs up to 2033.
- 3.5.14 According to the RLDP Proposals Map, the land at Moun-ton Road is allocated under Policy HA3 for a residential led mixed use development to provide approximately 146 homes and commercial uses such as Class C1 hotel and Class C2 residential care home. The policy outlines that the development of the site should accord with a number of specified parameters, placemaking principles and development requirements, which should be delivered in an appropriately phased manner and be formally tied to planning consents. The policy goes on to state that a masterplan establishing key design and placemaking principles should be agreed with the Local Planning Authority prior to the determination of any planning application.
- 3.5.15 The Proposals Map also shows that the site remains included within the Mineral Safeguarding Area for Limestone under Policy M2 but has been removed from the Green Wedge designation. The Green Wedge preventing the coalescence between Chepstow, Pwllmeyric and Mathern remains a policy within the Plan.
- 3.5.16 Strategic Policy S1 (Growth Strategy) outlines that between 2018 and 2033 the Plan will make provision for 6,210 homes (this figure includes a 15% flexibility allowance) to meet a housing requirement of 5,400 homes. The policy goes on to confirm that the focus of this growth will be in the County's most sustainable settlements which as per Strategic Policy S2 (as outlined below) includes Chepstow.
- 3.5.17 Following on from site specific policy HA3, Strategic Policy S8 (Site Allocation Placemaking Principles) outlines a number of placemaking principles each allocated site must incorporate centred around the themes of sustainable communities; green infrastructure, landscape and nature recovery; sustainable travel and highways, education requirements, residential amenity, flood risk and sustainable drainage systems.
- 3.5.18 Policy H1 (Residential Development in Primary and Secondary Settlements) defines the settlement boundary to Chepstow to which Land at Moun-ton Road is included and development is considered to be acceptable.
- 3.5.19 Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) confirms that Chepstow is a Tier 1 Primary settlement and as such, is a focus for new development reflected in the range services, facilities and transport available within the Town.
- 3.5.20 Strategic Policy S3 (Sustainable Placemaking & High Quality Design) seeks to ensure that all development will contribute to creating high quality, attractive and sustainable places that support the health and well-being of the community and respond to climate change.
- 3.5.21 In order to achieve this, the policy outlines that development must:
- Incorporate high quality, sustainable, safe and inclusive design that offers ease of access for all and provides connectivity between uses;
  - Incorporate an appropriate mix of uses, where applicable, to minimise the need to travel and to maximise opportunities for sustainable travel;
  - Incorporate a green infrastructure-led approach that respects local distinctiveness and the character of the site and its surroundings; and
  - Protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places.





- 3.5.22 Policy S7 (Affordable Housing) – outlines that on-site provision of 50% affordable homes on all new site allocations will be required to meet the affordable homes target of 1,595-2,000 homes across the Plan period.
- 3.5.23 Policy PM1 (Creating well-designed places) follows on from Strategic Policy S3 and states that all development should be of a high-quality sustainable design and respect the local character and distinctiveness of Monmouthshire's built, historic and natural environment and adhere to 7 criteria relating to the existing built form, massing and materials of the site's setting, ensure a safe, secure, pleasant and accessible environment, contribute towards a sense of place whilst being compatible with the local context, respect local distinctiveness and landscape character, maintain reasonable levels of privacy and amenity of neighbouring occupiers, avoid inappropriate infilling and integrate multifunctional green and blue infrastructure and public open space within site boundaries, providing connectivity to wider networks as appropriate.
- 3.5.24 Strategic Policy S6 (Infrastructure) makes it clear that to mitigate any impacts, new or improved infrastructure must be provided as part of the proposed development and planning agreements will be sought to secure improvements to secure the provision of a number of elements including (but not limited to) affordable housing, education, sustainable transport measures, transport infrastructure, green and blue infrastructure and ecological mitigation.
- 3.5.25 Policy ST2 (Highway Hierarchy) identifies the A48/A466 High Beech Roundabout as a main arterial route whereby any proposals for on street parking, new frontage access and turning movements will be considered against the interests of road safety and the efficient movement of traffic.
- 3.5.26 Other Replacement LDP Policies of relevance to the development proposals are:
- Strategic Policy S4 (Climate Change) - states that all development proposals will be required to address the causes of, and adapt to the impacts of climate change.
  - Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) – outlines that proposals must adopt a strategic and proactive placemaking approach based on a Green Infrastructure and step wise approach to maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscape, biodiversity, access and heritage assets.
  - Strategic Policy S13 (Sustainable Transport) – outlines that development proposals will be required to accord with the Sustainable Transport Hierarchy.
  - Strategic Policy S16 (Sustainable Minerals Management) – outlines that the Council will safeguard known/potential land won sand and gravel, sandstone and limestone resources for future possible use and maintain a minimum 10 year bank of crushed rock reserves.
  - Policy PM2 (Environmental Amenity) - outlines that development proposals should not cause or result in any harm to local amenity, health, the character/quality of the countryside or interests of nature conservation, landscape or built heritage importance, due to air, light or noise pollution.
  - Policy HE1 (Conservation Areas) - states that development proposal must preserve or enhance the character or appearance of a Conservation or their setting.
  - Policy NZ1 (Monmouthshire Net Zero Carbon Homes) – outlines that all new build residential development will be required to demonstrate compliance with a number of specified standards.
  - Policy CC1 (Sustainable Drainage Systems) – states that water management measures including Sustainable Drainage Systems (SuDS) must be incorporated into development proposals.
  - Policy GI1 (Green Infrastructure) – states that development proposals will be expected to maintain, protect and enhance the integrity and connectivity of Monmouthshire's diverse GI network as demonstrated by the submission of a GI Statement.
  - Policy GI2 (Trees, Woodland and Hedgerows) – outlines that the loss of trees, woodland and hedgerows will only be permitted when informed by appropriate surveys and assessments.



- Policy LC1 (Landscape Character) – states that Development proposals that would impact upon landscape character, must demonstrate how landscape character has influenced their design, scale, nature and site selection.
- Policy LC4 (Wye Valley National Landscape (AONB)) – states that Development proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.
- Policy NR1 (Nature Recovery and Geodiversity) – outlines that where biodiversity of ecosystem resilience could be impacted, applications must be accompanied by an ecological survey.
- Policy ST1 (Sustainable Transport Proposals) – states that new highway infrastructure and design will be expected to satisfy Active Travel Act Guidance, National and Local highway design guides and parking guidelines.
- Policy CI2 (Provision of Formal and Informal Open Space and Allotments / Community Growing Areas) outlines that development proposals will be assessed against the Councils' standards for the provision of such open space typology.



## 4 CHAPTER 4 ECOLOGY

### 4.1 Introduction

- 4.1.1 This chapter, prepared by the Environmental Dimension Partnership Ltd (EDP), presents an assessment of the likely significant effects of the Proposed Development on Important Ecological Features (IEFs) including species populations, habitats and designated sites.
- 4.1.2 The chapter provides a brief summary of relevant legislation, planning policy and guidance, and a description of the methodology adopted for the assessment. This is followed by a description of the relevant baseline conditions of the Site and the surrounding area, and an assessment of the potential effects of the Proposed Development during construction and, once the Proposed Development is completed. Mitigation measures are identified, where appropriate, to avoid, reduce, mitigate or compensate for any adverse effects, adopting the step-wise approach embedded within Planning Policy Wales (PPW). A summary of the likely significant residual effects of the Proposed Development is provided, having regard to mitigation adopted.
- 4.1.3 The chapter is based upon the findings of a desk study and detailed ecological investigations undertaken during 2024 with respect to habitats, bats, badger (*Meles meles*), dormouse (*Muscardinus avellanarius*) and common reptiles, the scope of which was informed by a Screening and Scoping Opinion received from Monmouthshire County Council (MCC) in November 2024 and April 2025 respectively; and initial baseline investigations undertaken by EDP in 2019 and 2020 to inform allocation of the Site within MCC's Replacement Local Development Plan (LDP). The detailed findings of the ecological surveys undertaken of the Site are set out within an Ecological Baseline Report provided at Appendix 4.1 to this Environmental Statement (ES).
- 4.1.4 The cumulative effects of the Proposed Development and other relevant schemes have also been considered and are presented where relevant.
- 4.1.5 This chapter should be read in conjunction with the development description provided in Chapter 2: Description of Site and Proposals.

### 4.2 Assessment Methodology

- 4.2.1 The scope of the Ecological Impact Assessment (EclA) has been determined by current ecological investigations of the Site. This process informed the identification of Important Ecological Features (IEFs) pertinent to the proposals, and the likely scope of potential impacts on these receptors.

#### Planning Policy Context

- 4.2.2 *Planning Policy Wales, Edition 12*, February 2024 (PPW) Chapter 6: Distinctive and Natural Places (Welsh Government, 2024), and PPW supplementary Technical Advice Note 5 (TAN 5): Nature Conservation and Planning (Welsh Government, 2009), set out particular policies in relation to the protection of biodiversity, green infrastructure, and geological conservation through the planning system. Such policies include those receiving statutory protection under existing legislative provisions and also those sites, habitats and species out with such protection, thereby ensuring that the potential impacts of planning decisions on biodiversity, green infrastructure and geological conservation are fully considered.



4.2.3 MCC's Adopted LDP sets out planning policy for the county up until 2021 (MCC, 2014) with further details provided within the adopted Green Infrastructure Supplementary Planning Guidance (SPG) (MCC, 2015). The LDP includes Policy NE1 (Nature Conservation and Development) which states:

*"Development proposals that would have a significant adverse effect on a locally designated site of biodiversity and/or geological importance, or a site that satisfies the relevant designation criteria, or on the continued viability of priority habitats and species, as identified in the UK or Local Biodiversity Action Plans or Section 42 list of species and habitats of importance for conservation of biological diversity in Wales, will only be permitted where: a) the need for the development clearly outweighs the nature conservation or geological importance of the site; and b) it can be demonstrated that the development cannot reasonably be located elsewhere.*

*Where development is permitted, it will be expected that any unavoidable harm is minimised by effective avoidance measures and mitigation. Where this is not feasible appropriate provision for compensatory habitats and features of equal or greater quality and quantity must be provided.*

*Where nature conservation interests are likely to be disturbed or harmed by development proposals, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on the species/habitats, and, where necessary, shall make appropriate provision for their safeguarding.*

*Development proposals shall accord with nature conservation interests and will be expected to: i) Retain, and where appropriate enhance, existing semi-natural habitats, linear habitat features, other features of nature conservation interest and geological features and safeguard them during construction work; ii) Incorporate appropriate native vegetation in any landscaping or planting scheme, except where special requirements in terms of purpose or location may dictate otherwise; iii) Ensure the protection and enhancement of wildlife and landscape resources by appropriate building design, site layouts, landscaping techniques and choice of plant species; iv) Where appropriate, make provision for on-going maintenance of retained or created nature conservation interests."*

4.2.4 Furthermore, Policy S13 (Landscape, Green Infrastructure and the Natural Environment) states:

*"Development proposals must:*

- 1) Maintain the character and quality of the landscape by: (i) identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character; (ii) protecting areas subject to international and national landscape designations; (iii) preserving local distinctiveness, sense of place and setting; (iv) respecting and conserving specific landscape features, such as hedges, trees and ponds; (v) protecting existing key landscape views and vistas;*
- 2) Maintain, protect and enhance the integrity and connectivity of Monmouthshire's green infrastructure network;*
- 3) Protect, positively manage and enhance biodiversity and geological interests, including designated and non-designated sites, and habitats and species of importance and the ecological connectivity between them; and*
- 4) Seek to integrate landscape elements, green infrastructure, biodiversity features and ecological connectivity features, to create multifunctional, interconnected spaces that offer opportunities for recreation and healthy activities such as walking and cycling."*

4.2.5 Of further pertinence are Policies EP2 (Protection of Water Sources and the Water Environment) and Policy GI1 (Green Infrastructure) which reflect importance of protecting habitats, and networks of habitats, within the LDP.



## Relevant Guidance

4.2.6 The following legislation and guidance are of specific relevance to this assessment:

- The Conservation of Habitats and Species Regulations 2017 (as amended) enacts within the UK, the EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (as amended) and Directive 2009/147/EC on the Conservation of Wild Birds. These Regulations provide for the designation and protection of statutory designated wildlife sites of European value ('European sites'), and the protection of a number of rare and vulnerable species in a European context ('European Protected Species' (EPS)). European sites, including Special Protection Areas (SPAs), Special Area of Conservation (SACs) and Ramsar Sites are recommended for designation in the UK by the Joint Nature Conservation Committee (JNCC);
- The Wildlife and Countryside Act 1981 (as amended principally by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006) enshrines the protection of statutory designated wildlife sites of national importance, Sites of Special Scientific Interest (SSSIs) in England and Wales. The Act also sets out varying degrees of protection and offences with regard to native species and their habitats that are rare and vulnerable in a national context. The Act also provides for the control and management of invasive non-native species. SSSIs and National Nature Reserves (NNRs) are designated by Natural Resources Wales (NRW) under the Act and are protected from any development that may destroy or adversely affect them, either directly or indirectly;
- The Environment (Wales) Act (Welsh Government, 2016) has become law in 2016, setting out a requirement for the sustainable management of natural resources necessary to build greater resilience into ecosystems, thereby providing a context for the delivery of multi-functional green infrastructure. Section 6 under Part 1 of this Act introduced an enhanced biodiversity and resilience of ecosystems duty for public authorities in the exercise of its function in relation to Wales. Additionally, Section 7 of this Act sets out a requirement for biodiversity lists of priority habitats and species of principle importance to conservation in Wales to be published and maintained, replacing Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006;
- The Animal Welfare Act 2006 further protects wild animals from unnecessary suffering when under the control of man and includes the Wild Mammals (Protection) Act 1996 which protects wild mammals from intentional cruelty and the Protection of Badgers Act 1992 which affords protection specifically to badgers and their setts;
- 'Important' hedgerows, as defined in the Regulations are protected from removal (up-rooting or otherwise destroying) by the Hedgerow Regulations 1997; and
- Locally important sites such as Sites of Importance for Nature Conservation (SINCs) are non-statutory designations declared by MCC under the provision of the National Parks and Access to the Countryside Act 1949. This aims to bring sites of established nature conservation value into active management for the public and to protect them from development that would adversely affect their substantive nature conservation value.



4.2.7 The approach taken in this assessment is made with reference to the guidelines published by the Chartered Institute of Ecology and Environmental Management (CIEEM) in 2018 (and last updated in April 2022). In addition, the following guidance has informed the assessment of effects within this Chapter:

- British Standards Institute (2013) BS 42020 - Biodiversity - Code of Practice for Planning and Development;
- Joint Nature Conservation Committee (2010) Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit;
- Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition. Bat Conservation Trust, London;
- Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition. The Bat Conservation Trust, London;
- British Standards Institute (2015) BS 8596:2015 -Surveying for Bats in Trees and Woodland;
- Bat Conservation Trust and Institute of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting at Night;
- Bright, P.W, Morris, P.A. and Mitchell-Jones, T. (2006). The Dormouse Conservation Handbook Second Edition. English Nature, Peterborough;
- Harris S, Cresswell P and Jefferies D (1989). Surveying Badgers. Mammal Society;
- Wilson, G.; Harris, S. and McLaren, G. (1997) Changes in the British Badger Population – 1998 to 1997. People’s Trust for Endangered Species, London;
- Cresswell P, Harris S, Jefferies DJ (1990). The history, distribution, status and habitat requirements of the Badger in Britain. Nature Conservancy Council; and
- Froglife (1999). Froglife Advice Sheet 10: reptile survey. Froglife, London.

## Study Area

4.2.8 The field surveys undertaken to inform the assessment covered the Site boundary and, in some instances, adjacent habitats, to provide contextual information and/or to ensure species populations were studied adequately. This included a survey of accessible land within 30m of the Site for evidence of badger. Where access to adjacent land was not available (due to land ownership boundaries) assumptions have been made on the ecological character of the adjacent land based on other information such as aerial imagery and/or potential to support protected/notable species.





- 4.2.9 The Site subject to survey is centred approximately at Ordnance Survey Grid Reference (OSGR) ST 52434 93308, located on the western edge of the town of Chepstow. It encompasses agricultural farmland predominantly comprising sheep-grazed poor semi-improved grassland whose boundaries are delineated by native hedgerows, unvegetated fence lines and broadleaved semi-natural and plantation woodland. The northern boundary of the Site is partially delineated by patches of broadleaved woodland and residential properties with Mounton Road located beyond, whilst the eastern boundary is delineated by the A466 Wye Valley Link Road, and the western boundary is bordered by plantation woodland. Agricultural fields lie adjacent to the southern and western boundaries of the Site. Land to the immediate east is dominated by residential housing, with the River Wye situated beyond, c.1.3km east of the Site. In contrast, land to the west is dominated by agricultural farmland with large woodland units and smaller residential settlements and farms.
- 4.2.10 An ecological desk study, encompassing the Site and wider landscape, was undertaken during September and November 2024 (see Appendix 4.1 for detailed scope and methodologies employed). A search radius of 10km from the Site was employed for statutory designated sites of international importance, 2km for sites of national importance, 2km for sites of local importance, 6km for Annex II bat species, 2km for protected/ priority species records and 500m for notable habitat records.
- 4.2.11 The spatial extent of the Ecological Impact Assessment (EclA) has been defined as the potential Zone of Influence (Zoi). The Zoi has been determined through a review of the baseline ecological conditions relative to the Site and consideration of the likely activities associated with the Proposed Development, as well as through professional judgement and liaison with other specialists involved in assessing the impacts of the Proposed Development as considered within the ES and other supporting documentation.

### Baseline Methodology

- 4.2.12 The baseline ecology information collated by EDP during 2024 for the Site and its surroundings is detailed within the Ecological Baseline Report contained within Appendix 4.1. This details the full methodologies employed, the subsequent findings, and identifies those IEFs that are pertinent to the EclA. A summary of desk study and survey findings is provided below.
- 4.2.13 The desk study is an important element of undertaking an initial ecological appraisal of a site proposed for development, which entails the initial collation and review of contextual information, such as designated sites, together with known records of important habitats or species.
- 4.2.14 The desk study involved collating biodiversity information from the following sources:
- South East Wales Biodiversity Records Centre (SEWBReC);
  - Gloucestershire Centre for Environmental Records (GCER);
  - Multi-Agency Geographic Information for the Countryside (MAGIC) website<sup>1</sup>; and
  - National Biodiversity Network (NBN) Atlas website<sup>2</sup>.
- 4.2.15 The desk study was undertaken during September and November 2024 and involved obtaining the following information:
- International statutory designations (10km radius around the Site);
  - National statutory designations and non-statutory local sites (2km radius around the Site);

<sup>1</sup> [www.magic.gov.uk](http://www.magic.gov.uk)

<sup>2</sup> [www.nbnatlas.org](http://www.nbnatlas.org)



- Annex II bat<sup>3</sup> species records (6km radius around the Site);
- All other protected, priority<sup>4</sup> and notable<sup>5</sup> species records (2km radius around the Site); and
- All other notable habitat records (500m radius).

4.2.16 These search areas are considered sufficient to cover the potential zones of influence<sup>6</sup> of the proposed development in relation to designated sites, habitats and species.

4.2.17 As part of the desk study exercise previous survey information for the Site submitted with a planning application in 2013 for 'residential development comprising up to 200 dwellings, highway access, open space and landscaping' (planning reference: DC/2013/00571) was reviewed to obtain further contextual information.

4.2.18 In addition, the following suite of surveys has been carried out within the Site:

- An Extended Phase 1 habitat survey on 18 September 2019 and 06 May 2020, with an updated Extended Phase 1 habitat survey completed on 24 May 2024;
- Initial Ground Level Tree Assessment (GLTA) undertaken on 18 September 2019 and 06 May 2020 in accordance with best practice guidelines at the time (Collins, 2016), followed by an update GLTA of all trees onsite, undertaken on 19 March 2024 in accordance with updated best practice guidelines (Collins, 2023), to identify any potential roost features for bats so as to determine the available roosting resource and need for further survey; and to confirm presence/infer absence of roosting bats;
- Aerial inspections of all trees likely to be impacted by development proposals where Potential Roosting Features (PRF) for multiple bats (PRF-M) were identified during the update GLTA or where Further Assessment Required (FAR), undertaken on 05 June, 27 June and 18 July 2024;
- Nighttime Bat Walkover (NBW) surveys in accordance with best practice guidance (Collins 2024) completed each season in May (spring), July (summer) and September (autumn) 2024 to assess importance of a bat assemblage utilising the Site for foraging/commuting;
- Automated bat detector surveys conducted monthly between April and October 2024 to assess importance of a bat assemblage utilising the Site for foraging/commuting;
- Dormouse nest tube surveys completed between April and November 2024 to confirm presence/infer absence of this species onsite;
- Initial survey for badger activity undertaken on 18 September 2019 and 06 May 2020 with an update survey for this species undertaken on 22 March 2024 to assess usage of the Site by this species; and
- Detailed refugia-based reptile survey undertaken on 7 occasions between end August and September 2024 undertaken to confirm the presence and distribution, or likely absence, of reptiles within the Site.

4.2.19 The methodology used for these surveys is further detailed in Section 2 of Appendix 4.1.

## Consultation

4.2.20 Both a Screening and Scoping Opinion were received from MCC in November 2024 and April 2025 respectively. No comments were received from the Council's Ecologist to inform the Scoping Opinion.

<sup>3</sup> Bat species listed in Annex II of the EC Habitats Directive, namely Greater horseshoe, Lesser horseshoe, Barbastelle and Bechstein's bats.

<sup>4</sup> Species considered of key significance to sustain and improve biodiversity in Wales, as defined under Section 7 of Part 1 of the Environment (Wales) Act 2016

<sup>5</sup> Notable species are those which are not legally protected but are formally identified as being of conservation concern

<sup>6</sup> Zone of Influence - the areas and resources that may be affected by the proposed development



However, a response from NRW was received. Table 4.1 provides an overview of the consultation that has been undertaken to inform the Proposed Development and EIA, pertinent to ecological matters. including the consideration of likely significant effects and the methodology for assessment.

**Table 4.1: Consultation Responses Relevant to this Chapter**

Date	Consultee and Issues Raised	How/ Where Addressed
NRW		
04 April 2025	<p>Designated Sites: <i>'We note that under section (e) Ecology of the Request for Scoping there is no reference to the potential impacts the development may have on the qualifying features of the Severn Estuary Special Protection Area (SPA). The potential impact pathways to this SPA include noise and visual disturbance through increased foot traffic in the area and displacement through removal of potential habitat. The potential impacts on the Severn Estuary SPA should be considered in the ES.'</i></p> <p><i>We note the comments made in appendix II pages 5 and 6 table in relation to the impact pathways on the features of the Severn SPA and agree with the conclusion that a Habitats Regulations Assessment would be appropriate. However, there is no reference to the potential impact through reduced habitat and we advise that this is considered in the ES as overwintering birds may utilise the fields for shelter or loafing during the winter months. We welcome that the Scoping Request states that a Construction Environmental Management will be produced to mitigate potential impacts on the designated sites.'</i></p>	An assessment of designated sites including the Severn Estuary SPA is provided within this ES at sections 4.5 and 4.6.
	Protected Species: <i>'The ES for this proposed development should include sufficient information to enable the decision maker to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals. Evaluation of the impacts of the scheme should include direct and indirect; cumulative; short, medium and long-term; permanent and temporary; positive and negative; construction, operational and decommissioning/post operational phases and impacts on long-term site security of the nature conservation resource.'</i>	This ES and an evaluation of impacts has been informed by the results of ecological surveys undertaken for the Site including a desk study, Extended Phase 1 habitat survey and further detailed surveys with respect to bats (including those species associated with statutory designations in the ZOI), badger, dormouse and reptiles. The results of ecological surveys undertaken and identification of IEFs' pertinent to the EIA are provided within an Ecological Baseline Report submitted as Appendix 4.1 to this ES Chapter. An evaluation of the impacts of the scheme on these IEFs has subsequently been undertaken in accordance with the guidelines
	Description of Biodiversity: <i>'The ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of</i>	



Date	Consultee and Issues Raised	How/ Where Addressed
	<i>those impacts.</i>	published by CIEEM in 2018 (and last updated in April 2022).
	Key Habitats: <i>'Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.'</i>	The Extended Phase I habitat survey was undertaken in accordance with best practise guidance (JNCC, 2010), at a level intermediate between a standard Phase 1 survey technique, involving habitat mapping and description, and a Phase 2 survey, based on detailed habitat and species surveys. The full methodology and survey results is provided at Appendix 4.1. The survey was completed on 24 May 2024 considered to be within the optimal period for undertaking an Extended Phase 1 habitat survey and supplements the results of Extended Phase I Habitat Surveys previously completed in September 2019 and May 2020.
	<p>Surveys: <i>'We advise that the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals.</i></p> <p><i>Targeted species surveys should be undertaken for all species scoped in which: i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and, ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the ES. The above letter mentions a further update desk study and Extended Phase I Habitat Survey during 2024; however, the results of these surveys appear not to be available.</i></p> <p><i>We are aware that the Preliminary Ecological Appraisal (PEA) report, dated August 2021, submitted as part of the candidate site information for the Monmouthshire Replacement Local Development Plan (RLDP) confirmed dormouse presence on site. We advise that the results of all surveys undertaken to date are included in the ES, as well as proposals for dormouse habitat retention, mitigation and compensation. The PEA report includes recommendation for detailed aerial inspection to confirm presence/likely absence of</i></p>	All ecological surveys of the Site have been undertaken with reference to the relevant published guidance and by appropriately qualified and/or NRW licensed ecologists where applicable. The methodologies adopted are detailed within the Ecological Baseline Report provided at Appendix 4.1 with any limitations to survey effort communicated here also.



Date	Consultee and Issues Raised	How/ Where Addressed
	<p><i>roosting bats in any trees with moderate or high potential to support roosting bats, plus further ground level assessment of all trees within the working footprint when a fixed masterplan for the proposals has been established. We welcome this recommendation and advise that up-to-date bat tree survey information, along with any mitigation proposals as necessary, are included in the ES. We are aware that commuting and foraging bats were recorded on site in 2012 and July 2013 including common pipistrelle, soprano pipistrelle, possible Nathusius' pipistrelle, noctule, serotine, Myotis sp., lesser horseshoe and greater horseshoe bats. We are also aware that the PEA report recommends update survey effort comprising manual transect and automated bat detector surveys to inform any future planning submission which we advise is included in the ES. All surveys for bats should be carried out in accordance with 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' (4th edition), published by the Bat Conservation Trust, 2023. We note that otters, great crested newts and water voles are scoped out of further surveys and are presumed to be absent from the site. We are content with this approach in this instance.'</i></p>	
	<p>Impact Assessment: 'Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium, and long-term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species. We advise that ES considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration be given to the current conservation status of the relevant species. The ES must demonstrate that there will be no detriment to maintenance of Favourable Conservation Status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme. Where proposals implicate protected species, which are also notified features of designated sites (e.g. SAC, SSSI), we advise that the ES considers the impacts on those species from both perspectives. We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and</p>	<p>IEFs pertinent to the Proposed Development are identified below (Baseline Environment) and include those designated sites, habitats and species populations valued at Local level ecological importance (or greater) or otherwise those subject to legal protection. An evaluation of the impacts of the scheme on these IEFs has subsequently been undertaken in accordance with the guidelines published by CIEEM in 2018 (and last updated in April 2022). The outcome of this assessment and any mitigation/compensation measures necessary to ensure residual negative effects are reduced to negligible are provided within latter sections of this ES Chapter.</p>



Date	Consultee and Issues Raised	How/ Where Addressed
	<i>long-term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.'</i>	
	<i>European Protected Species Licence: 'Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The ES must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). Where a European Protected Species is present, and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if: (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; (b) There is no satisfactory alternative and (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the EIA where a European Protected Species is present.'</i>	This ES Chapter identifies those EPS species confirmed present/potentially present onsite, identifies any requirement for an EPS licence and establishes the necessary avoidance, mitigation and/or compensation measures considered necessary to ensure the favourable conservation status of the species can be maintained.





Date	Consultee and Issues Raised	How/ Where Addressed
	<p>Local Biodiversity Interests:</p> <p><i>'We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan and those that are considered important for the conservation of biological diversity in Wales. We would expect the developer to contact other relevant people/ organisations for biological information/ records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups). Finally, we advise that the development incorporates robust green infrastructure that will remain unlit to allow protected species to continue to inhabit the site and move through it. It is vital that the design of the development avoids narrow green infrastructure corridors through it and avoids breaks in those corridors.'</i></p>	<p>No comments have been received from the Council Ecologist in relation to a Scoping Opinion to date although the scope of ecological survey effort and an ES has been informed by the outcome of initial ecological investigations undertaken to inform allocation of the Site within MCC's Replacement Local Development Plan and subject to consultation during the examination stages. The ecological baseline of the Site has otherwise been informed by consultation with Local Records Centres during a desk study exercise, detailed within Appendix 4.1.</p> <p>An Illustrative Masterplan for the Proposed Development has been designed with reference to MCC's Green Infrastructure Supplementary Planning Guidance. The scheme has sought to retain broadleaved and plantation woodland defining the northern and western boundaries of the Site and offset these from the development footprint, ensuring the maintenance of wildlife corridors along these boundaries of the Site. Further avoidance, mitigation and compensation measures to maintain and enhance the ecological resource of the Site are detailed within the latter sections of this ES Chapter.</p>

## Assessment Criteria and Assignment of Significance

- 4.2.21 The evaluation of IEFs has been made with reference to the guidelines published by CIEEM. The guidelines propose an approach to valuing features that involves professional judgement based on available guidance and information, together with advice from experts who know the locality of the project and/or the distribution and status of the species or features that are being considered.
- 4.2.22 An assessment of likely significant effects of the Proposed Development on the ecological features identified above has been undertaken based upon the Illustrative Masterplan and Green Infrastructure/Landscape Strategy Plan prepared for the Proposed Development which incorporate any inherent impact avoidance, minimisation and mitigation determined throughout the iterative assessment and design process. Those potential significant effects assessed include such inherent mitigation as detailed on the Illustrative Masterplan and Green Infrastructure/Landscape Strategy Plan but, initially, in the absence of any other avoidance, mitigation and compensation measures.



## Geographical Context

4.2.23 The Guidelines recommend that the value or potential value of an ecological resource or feature be determined within a defined geographical context and recommends that the following frame of reference be used:

- International and European;
- National (Wales);
- Regional (South East Wales);
- County (Monmouthshire); and
- Local (Chepstow).

## Valuing Designated Sites

4.2.24 Within the UK, certain valued habitats have been assigned a level of nature conservation value through designation; and the Guidelines referred to above recommend that the reasons for this designation need to be taken into account in the assessment. Such designations include:

- Internationally important sites such as SACs, SPAs and RAMSAR sites;
- Nationally important sites such as SSSIs, NNRs and Local Nature Reserves (LNRs); and
- Regional/County/District important sites, which within Monmouthshire are referred to as SINCs.

4.2.25 Where a feature has value at more than one designation level, its overriding value is that of the highest level.

## Valuing Habitats

4.2.26 The Guidelines recommend that the value of areas of habitat and plant communities should be measured against published selection criteria where available, such as those listed on Annex 1 of the Conservation of Habitats and Species Regulations 2017 (as amended), or those listed as habitats of principal importance under Section 7 of the Environment (Wales) Act 2016. Where areas of a habitat or plant communities do not meet the necessary criteria for designation at a specific level, the Guidelines recommend that the ecologist may consider the local context, if appropriate. Additionally, consideration should also be given to the potential value of those habitats, particularly where habitats are in a degraded or unfavourable condition at the time of the assessment.

## Valuing Species

4.2.27 The Guidelines require consideration of all protected species as 'important' features where there is the potential for a breach in legislation. Additionally, species should be assessed according to their biodiversity value, measured against published selection criteria where available (such as those listed on Annex 1 of the Habitats Directive and those listed as species of principal importance under Section 7 of the Environment (Wales) Act). In assigning value to a species, it is necessary to consider its distribution and status, including a consideration of trends based on available historical records, as well as their legal protection. The valuation of populations should make use of any relevant published evaluation criteria available at the time of assessment, including consideration of their local context, if appropriate.



## Characterising Potential Impacts

- 4.2.28 The Guidelines state that the assessment of impacts should be undertaken in relation to the baseline conditions within the Zol that are expected to occur if the development were not to take place. Having identified the activities likely to cause significant impacts, it is then necessary to describe the resultant changes and to assess the impact on important ecological features.
- 4.2.29 The Guidelines recommend that the process of identifying impacts should make explicit reference to aspects of ecological structure and function on which the feature depends. Impacts must be assessed in the context of the baseline conditions within the Zol during the lifetime of the proposed residential development.
- 4.2.30 When describing changes/activities and impacts on ecosystem structure and function, reference should be made to the following parameters:
- Beneficial or adverse;
  - Extent (i.e., the spatial or geographical area over which the impact may occur during a representative range of conditions);
  - Magnitude (i.e., the size, amount, intensity or volume. Magnitude is quantified where possible and provided in absolute or relative terms);
  - Duration (which is defined in relation to ecological characteristics such as the lifecycle of a species as well as human timeframes);
  - Timing and frequency (timing may change the result of an impact if it coincides with sensitive life-stages or seasons, and the number of times an activity occurs will influence the resulting effect); and
  - Reversibility (an effect is considered reversible if it can be counteracted by mitigation or if spontaneous recovery is possible).
- 4.2.31 In order to characterise the likely change and impact, it is necessary to take into account all the above parameters.

## Significance of Effects

- 4.2.32 The assessment identifies those beneficial and adverse impacts which would be 'significant', based on effects that either support or undermine the conservation objectives of the ecological feature or biodiversity in general. Significant effects encompass impacts on structure and function of defined sites, habitats or ecosystems, and the conservation status of habitats and species (including extent of abundance and distribution). Such significant effects are qualified with reference to an appropriate geographic scale and based on the best available scientific evidence. Where it is not possible to robustly justify that no significant effect will occur, a significant effect is assumed.
- 4.2.33 The integrity of 'designated' sites is described as follows and is taken from the Guidelines for Ecological Impact Assessment in the UK (CIEEM, 2018). It has been used in this assessment to determine whether the impacts of the proposals on a designated site are likely to be significant:

*"Significant effects encompass impacts on the structure and function of defined sites, habitats or ecosystems and the conservation status of habitats and species.... The following need to be determined: For designated sites - is the project and associated activities likely to undermine the conservation objectives of the site, or positively or negatively affect the conservation status of species or habitats for which the site is designated, or may it have positive or negative effects on the condition of the site or its interest/qualifying features?"*

*The conservation status of habitats and species within a defined geographical area is described as follows (CIEEM, 2018), and has been used in this Chapter to determine whether the impacts of the proposals on non-designated habitats and species are likely to be significant:*



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*Habitats - conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area;*

*Species - conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area."*

- 4.2.34 Although certain species and habitats may not constitute IEFs, based upon their nature conservation value, they may still warrant consideration during the design of the development (and any mitigation identified) based on their legal protection, their implications for policies and plans, or other issues, such as animal welfare.
- 4.2.35 Due to the application of the CIEEM guidance, the impact assessment presented in this chapter differs slightly in approach to the remainder of the ES, with each IEF being assessed in terms of whether or not an impact (beneficial or adverse) is significant (assessment of impact) alongside the geographical scale at which this occurs (importance of feature). No scale is ascribed to the assessment of effects (i.e. they are either significant or not significant) except in relation to the geographic context.
- 4.2.36 The significance of the potential effects upon IEFs has been assessed both before and after consideration of the additional mitigation measures. The latter represents the assessment of the residual effects of the Proposed Development.

### **Limitations of the Assessment**

- 4.2.37 The vast majority of surveys have been undertaken in suitable weather conditions at optimum times of year with reference to best practice guidance. All of the surveys have been completed by suitably qualified surveyors. Any limitations in the survey work are detailed in Appendix 4.1.
- 4.2.38 It should also be noted that, owing to the seasonality of some species, as well as the ability for some species to quickly colonise sites, the absence of evidence of any particular species from within the Site should not be taken as conclusive proof that the species is not present or that it will not be present in the future. However, it is considered that the results of the surveys are robust and reliable for the identification of the habitats and the presence or absence of legally protected species and other IEFs. Where there is any uncertainty, a precautionary approach to the valuation of IEFs and assessment of impacts has been adopted.
- 4.2.39 All IEFs of less than 'Local' geographic value have been scoped out of the EclA, unless they require further consideration owing to their legal status and/or are considered more holistically with respect to biodiversity impacts and the delivery of net gains in biodiversity.

## **4.3 Baseline Environment**

- 4.3.1 This section summarises the baseline ecological conditions determined through the course of desk-based and field-based investigations. This section identifies and evaluates those ecological features/receptors that lie within the Site's potential Zol, and which are pertinent in the context of the Proposed Development. Further technical details are provided within Appendix 4.1.



## Designated Sites

- 4.3.2 Statutory designations represent the most significant ecological receptors, being of recognised importance at an international and/or national level. International designations include SPAs, SACs and Ramsar sites. National designations include SSSIs and NNRs. Local level statutory designations include LNRs and are generally considered to be of importance at the County level or lower.
- 4.3.3 Non-statutory designations are also commonly referred to in planning policies as 'local sites', although such designations are typically considered to be of importance at a County level. In Monmouthshire, such designations are termed SINCs. Additional sites such as non-designated nature reserves (e.g. Wildlife Trust nature reserves) and Ancient Semi-natural Woodland (ASNW) are considered here when not covered by other designations.
- 4.3.4 No part of the Site is covered by any statutory designations. However, there are six internationally important designations within 10km of the Site and five nationally important designations within 2km of the Site.
- 4.3.5 No part of the Site is covered by any non-statutory designations. There are 16 SINCs, one Wildlife Trust Reserve, one Gloucestershire Wildlife Trust (GWT) Nature Reserve and one Local Wildlife Site located within 2km of the Site. Of particular pertinence, an area of Restored Ancient Woodland (RAW), circa 0.36ha in size, lies adjacent to the northern boundary of the Site. Further areas of ASNW are located approximately 185m south-west of the Site.
- 4.3.6 These sites are summarised in Table 4.2 and illustrated at Appendix 4.1, Plan EDP 1-2.

**Table 4.2: Statutory and Non-statutory Designated Sites**

Designation	Approx. Distance from Site	Interest Feature(s)
Internationally Important Statutory Designated Sites (within 10km of the Site)		
River Wye SAC	Closest 840m north-east	The River Wye is designated for its assemblage of Annex I habitats including water courses of plain to montane levels with the <i>Ranunculus fluitans</i> and <i>Callitriche-Batrachion</i> vegetation. It also supports populations of white-clawed crayfish ( <i>Austropotamobius pallipes</i> ), sea lamprey ( <i>Petromyzon marinus</i> ), brook lamprey ( <i>Lampetra planeri</i> ), river lamprey ( <i>Lampetra fluviatilis</i> ), twaite shad ( <i>Alosa fallax</i> ), Atlantic salmon ( <i>Salmo salmo</i> ), bullhead ( <i>Cottus gobio</i> ) and otter ( <i>Lutra lutra</i> ), all Annex II species.
Wye Valley Woodlands SAC	Closest 840m north-east	This SAC is designated for its assemblage of Annex I habitats including <i>Asperulo-Fagetum</i> beech forests, <i>Tilio-Acerion</i> forests of slopes, screes and ravines and <i>Taxus baccata</i> woods of the British Isles. Though not a reason for selection of the site, the SAC also supports populations of lesser horseshoe bat ( <i>Rhinolophus hipposideros</i> ).
Severn Estuary SPA, SAC and Ramsar	2.6km south-east	SPA: Designated for supporting populations of European importance, overwintering Bewick's swan ( <i>Cygnus columbianus bewickii</i> ) and migratory curlew ( <i>Numenius arquata</i> ), dunlin ( <i>Calidris alpina</i> ), pintail ( <i>Anas acuta</i> ), redshank ( <i>Tringa totanus</i> ) and shelduck ( <i>Tadorna tadorna</i> ). The site also supports a population of European importance of passage ringed plover ( <i>Charadrius hiaticula</i> ) and is a wetland of international importance.  SAC: Designated for its assemblage of Annex I habitats including: estuaries; mudflats and sandflats not covered by seawater at low tide; and Atlantic salt meadow. Also, a



Designation	Approx. Distance from Site	Interest Feature(s)
		qualifying feature are its populations of twaite shad ( <i>Allosa fallax</i> ), sea lamprey ( <i>Petromyzon marinus</i> ) and river lamprey ( <i>Lampetra fluviatilis</i> ).
Wye Valley and Forest of Dean Bat Sites SAC	Closest 3.7km north-east and 3.8km north-west	The Wye Valley and Forest of Dean Bat Sites SAC supports over a quarter of the UK's lesser horseshoe population and 6% of the greater horseshoe ( <i>Rhinolophus ferrumequinum</i> ) population. The site is considered particularly important for its high density of maternity roost sites and the presence of disused mines that hold nationally significant hibernation roosts of lesser horseshoe bat.
Nationally Important Statutory Designated Sites (within 2km of the Site)		
River Wye SSSI	Closest 840m north-east	Similar to the above, the River Wye is designated for its aquatic habitats and assemblage of freshwater species including white-clawed crayfish, fish populations and otter, in addition to being of importance for its invertebrate assemblage.
River Wye (Lower Wye) SSSI	Closest 840m north-east	The River Wye (Lower Wye) is of special interest for three main aquatic plant community types – rivers on sandstone, mudstone and hard limestone; clay rivers; and lowland rivers with minimal gradient, as well as for certain flowering plants and bryophytes.
Pierce, Alcove and Piercefield Woods SSSI	840m north-east	This SSSI supports mixed semi-natural woodland comprising beech ( <i>Fagus sylvatica</i> ), yew ( <i>Taxus baccata</i> ) and lime ( <i>Tilia spp.</i> ) with a relict coppice structure and some standards.
Lower Wye Gorge SSSI	1.5km north-east	Designated for its woodland communities. The woods are a mixture of many types, including lime-sessile oak ( <i>Quercus petraea</i> ) stands on limestone, beech stands on both acid and alkaline soils in which lime, elm ( <i>Ulmus spp.</i> ), oak ( <i>Quercus spp.</i> ) and other species share dominance.
Pennsylvania Fields, Sedbury SSSI	1.3km east	An area of brackish pastureland overlying alluvial soils alongside the lower, tidal part of the River Wye.
Non-statutory Designated Sites (within 2km of the Site)		
Parc Penterry Meadow SINC	510m north	Species-rich meadow grassland bound by tall, overgrown hedges.
Part of Bishop's Barnets Wood SINC	950m north-west	Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.
Crossways Green 2 SINC	980m north	The site includes ancient woodland and an area of species rich grassland. This SINC also encompasses species-rich grassland.
Crossway Green SINC	1.1km north	A large species rich meadow surrounded on three sides by roads and ancient broadleaved woodland to the west. A veteran oak is present by the eastern boundary and a rich hedgerow is found along the east and southern boundaries.
Piercefield Avenue SINC	1.1km north	This site is a small triangle of semi-natural broadleaved woodland.
Piercefield Park SINC	1.2km north	A mosaic of grassland (both species-rich and species-poor neutral grassland), and trees with more substantial areas of woodland and scrub.
Beaufort Quarry SINC	1.2km south-east	Disused quarry close to the River Wye. The top of the cliffs supports mature ash/elm woodland whilst species-rich marshy grassland is also present. Peregrine falcon ( <i>Falco peregrinus</i> ) breeds here.



Designation	Approx. Distance from Site	Interest Feature(s)
Cliff Wood SINC	1.2km west	Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.
Strip of Cockshoot Wood SINC	1.3km north-west	Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.
Piercefield Wood Wildlife Trust Reserve	1.5km north	Native woodland which contains a plethora of tree species and supports important species including Cosnard's net-winged beetle ( <i>Erotides cosnardi</i> ), lesser and greater horseshoe bats and thriving populations of hazel dormouse.
Lancut and Ban-y-Gor GWT Nature Reserve	1.5km north-east	Ancient semi-natural woodland with plant, invertebrate and mammal interest.
Chepstow Racecourse SINC	1.5km north	Grassland at centre of Chepstow racecourse; species-rich calcareous grassland.
Wallwern Wood SINC	1.6km west	Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.
Dissused Lime Kiln Off St Pier SINC	1.7km west	Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.
Wyelands SINC	1.7km south-west	A flat site with drains running along the northern and southern boundaries comprising a mosaic of marshy grassland, scrub and tall herb communities. The Wildlife Site selection criteria also identify these habitats as of potential importance to marsh fritillary ( <i>Eurhydras aurinia</i> ) butterfly and double-line moth ( <i>Mythimna turca</i> ). Potential to support otter.
Parc Redding & Warren Slade SINC	1.8km south-east	Semi-natural broadleaved woodland.
Mathern Mill SINC	1.8km south-west	The site supports a marshy grassland community of varying structure.
Little Garrashill Wood SINC	2.0km north-west	Ancient Semi-natural Woodland and/or Plantation on Ancient Semi-natural Woodland.
Beachley Grassland LWS	2.0km south-east	Plant interest.

## Habitats

- 4.3.7 The distribution of different habitat types within and adjacent to the Site is described in detail within Appendix 4.1 and summarised in Table 4.3. A Phase I Habitat Plan illustrating field and hedgerow numbers is provided at Figure 4.1.

**Table 4.3: Summary of Habitats within the Site**

Potential IEF Importance	Approximate Distance from the Site and Key Attributes Nature Conservation Importance	Ecological Importance
Poor Semi-Improved grassland	Fields F1-F4.	Negligible.
Dense and scattered scrub	Scattered along the peripheries of the Site and field boundaries.	Negligible.
Native hedgerows	Hedgerows H1-H3, delineating internal field boundaries.	Local, priority habitat.
Plantation broadleaved woodland	South-western boundary of fields F1 and F2. North boundary of field F3.	Local.





Potential IEF Importance	Approximate Distance from the Site and Key Attributes Nature Conservation Importance	Ecological Importance
Semi-natural broadleaved woodland	Central part of the northern Site boundary.	Local, priority habitat.
Scattered trees	Scattered throughout field F1.	Site.
Tall ruderal vegetation	Scattered along the peripheries of the Site and field boundaries.	Negligible.

- 4.3.8 The majority of the Site is made up of habitats which are of less than Local level importance, or is otherwise of negligible, intrinsic importance. However, the hedgerows and semi-natural broadleaved woodland are judged to be of Local level importance whilst also comprising priority habitats for Wales. Furthermore, a number of the habitats, including those which are of limited intrinsic importance, also require consideration in relation to their importance in maintaining populations of protected, priority or other notable species.

## Protected and Priority Species

- 4.3.9 As set out previously, information on protected and/or notable species within or near to the Site was collected through a desk study and a range of field surveys. The findings of these investigations are set out in full in Appendix 4.1 and are summarised below.

### Breeding and Wintering Birds

- 4.3.10 All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:
- Intentionally kill, injure or take any wild bird;
  - Take, damage or destroy the nest of any wild bird while it is in use or being built;
  - Take, damage or destroy the egg of any wild bird; or
  - To have in one's possession or control any wild bird (dead or alive) or egg, or any part of a wild bird or egg.
- 4.3.11 In addition, further protection is afforded to those wild bird species listed on Schedule 1 of the Wildlife and Countryside Act 1981, prohibiting any intentional or reckless disturbance to these species while it is nest building, or at a nest containing eggs or young, or to recklessly disturb the dependent young of such a bird. A number of species are also included as priority species.
- 4.3.12 A large number of records of bird species were retrieved during the desk study, which include several records of Wildlife and Countryside Act 1981 Schedule 1 species, species listed on Section 7 of the Environment (Wales) Act 2016, and/or RSPB Red/Amber listed species of Birds of Conservation Concern in Wales<sup>7</sup>.
- 4.3.13 Records of Schedule 1 species within 2km of the Site include fieldfare (*Turdus pilaris*), brambling (*Fringilla montifringilla*), hobby (*Falco subbuteo*), redwing (*Turdus iliacus*), Cetti's warbler (*Cettia cetti*), goshawk (*Accipiter gentilis*), kingfisher (*Alcedo atthis*), red kite (*Milvus milvus*) and woodlark (*Lullula arborea*) whilst records for barn owl (*Tyto alba*) and peregrine falcon were returned within c.100m of the Site.
- 4.3.14 A number of other priority species have also been recorded within 2km, including records of Red listed species such as starling (*Sturnus vulgaris*), marsh tit (*Poecile palustris*), black-headed gull (*Chroicocephalus*

<sup>7</sup> Johnstone, I.G., Hughes, J., Balmer, D.E., Brenchley, A., Facey, R.J., Lindley, P.J., Noble, D.G. & Taylor, R.C. 2022. Birds of Conservation Concern Wales 4: the population status of birds in Wales. Milvus 2:1.



*ridibundus*), spotted flycatcher (*Muscicapa striata*), kestrel (*Falco tinnunculus*), goldcrest (*Regulus regulus*), greenfinch (*Chloris chloris*), herring gull (*Larus argentatus*), lesser black-backed gull (*Larus fuscus*), linnet (*Linaria cannabina*), meadow pipit (*Anthus pratensis*), swift (*Apus apus*), tree sparrow (*Passer montanus*) and whitethroat (*Curruca communis*).

- 4.3.15 Records of amber listed species include bullfinch (*Pyrrhula pyrrhula*), house sparrow (*Passer domesticus*), skylark (*Alauda arvensis*), common gull (*Larus canus*), dunnoek (*Prunella modularis*), great black-backed gull (*Larus marinus*), green woodpecker (*Picus viridis*), grey wagtail (*Motacilla cinerea*) and mistle thrush (*Turdus viscivorus*).
- 4.3.16 Breeding bird surveys undertaken in April, May and June 2013 to inform a historical planning application for the Site (planning reference: DC/2013/00571) identified 22 bird species within the Site, 13 of which were confirmed breeding, with boundary habitats supporting the most species. Overall, the bird assemblage recorded was considered fairly typical for the range and quality of habitats present.
- 4.3.17 Generally, dense scrub, native hedgerows and woodland habitat within and adjacent to the Site provides suitable foraging and nesting resource for an assemblage of woodland specialists as well as garden variety bird species. Agricultural land within the Site is likely to be of negligible importance for ground nesting species such as skylark given frequent disturbance posed by grazing livestock, whilst not reaching a sufficient height to offer suitable cover from predators. Such habitats are of potential value as a foraging resource, albeit limited given its agriculturally improved and species-poor nature, such that the presence of a significant assemblage of overwintering species in particular, utilising the Site for roosting and foraging is unlikely.
- 4.3.18 Overall, a breeding bird assemblage is considered to be of no more than Site level importance whilst a wintering bird assemblage is considered to be of negligible importance.

### Roosting/Foraging/Commuting Bats

- 4.3.19 All species of British bat are listed as EPS on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). This affords strict protection to bats and their roosts, and makes it an offence to:
- Deliberately capture, injure or kill a wild animal of an EPS;
  - Deliberately disturb wild animals of an EPS wherever they are occurring, in particular, any disturbance which is likely to impair their ability to survive, to breed or reproduce, to significantly affect the local distribution or abundance of the species to which they belong, or in the case of hibernating or migratory species, to hibernate or migrate; or
  - Damage or destroy a breeding site or resting place of a wild animal of an EPS.
- 4.3.20 Additional protection for bats is also afforded under the Wildlife and Countryside Act 1981, making it an offence to intentionally or recklessly disturb bats whilst they are occupying a structure or place which is used for shelter or protection, or to obstruct access to this structure or place. In addition, soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared bat (*Plecotus auritus*), greater horseshoe bat (*Rhinolophus ferrumequinum*), barbastelle bat (*Barbastella barbastellus*), Bechstein's bat (*Myotis bechsteinii*), noctule (*Nyctalus noctula*), and lesser horseshoe bat (*Rhinolophus hipposideros*) are also listed as priority species.
- 4.3.21 The desk study returned multiple records for bats within the 2km search radius around the Site. These records relate to at least 11 different species, including: Bechstein's bat, brown long eared bat, common pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentonii*), greater horseshoe, lesser horseshoe, Leisler's bat (*Nyctalus leisleri*), Natterer's bat (*Myotis nattereri*), noctule, serotine (*Eptesicus serotinus*) soprano pipistrelle, barbastelle and whiskered bat (*Myotis mystacinus*), in addition to unspecified records of long-eared (*Plecotus* sp.), *Myotis* sp. and *Pipistrellus* sp. bats. Records for other



- Annex II species occurring within 6km of the Site include barbastelle and Bechstein's bats, with a record of a roost for Bechstein's bat c.3.1km north-west of the Site.
- 4.3.22 The closest record of confirmed bat roosting is for common pipistrelle located approximately 480m south-east of the Site, with a possible day roost for soprano pipistrelle located approximately 450m north-east of the Site. Of pertinence is a maternity roost of unspecified *Pipistrellus* sp. bats 1.5km south-west in addition to possible maternity roosts for lesser horseshoe and brown long-eared bat, both c.1km south of the Site. Further confirmed bat roosts include one unspecified horseshoe (*Rhinolophus* sp.) roost 1.8km east, one greater horseshoe hibernation roost 3.9km north-east, two lesser horseshoe maternity roosts (closest 3.8km north-east) and one multi-species bat roost 3.5km north-east with maternity, hibernation and day roosts of lesser horseshoe, serotine, common pipistrelle and soprano pipistrelle bats.
- 4.3.23 A total of 12 trees or tree groups were identified during the GLTA as requiring further assessment or having PRF for bats. Of these, six trees and one tree group were subject to aerial inspection (namely T1, T6, G14, T24, T36, T38 and T59), either due to their potential to support multiple bats/maternity roosting or because they were likely to be affected by development proposals.
- 4.3.24 Following the GLTA and/or aerial inspection surveys, three trees were considered to have Potential Roost Feature(s) (PRFs) capable of supporting individual bats (PRF-I suitability: T15, T38, T59, T62) and six as having feature(s) capable of supporting multiple bats (PRF-M suitability: T1, T6, T24, T36, T64, T65), with one tree assessed as Further Assessment Required prior to confirming status (FAR: T66), albeit excluded from further aerial inspections given its proposed retention.
- 4.3.25 Overall, the habitats present within the Site are assessed as being of moderate suitability for foraging and commuting bats, offering suitable continuous habitat primarily in the form of broadleaved woodland present along the Site's peripheries, with good connectivity to more suitable bat habitat present across the wider landscape.
- 4.3.26 In summary, observations from the NBW surveys include foraging activity of common and soprano pipistrelle bats along the woodland edge forming the western and northern boundaries of the Site, with bat activity noted to be greatest here. More generally, common pipistrelle was the dominant species recorded across the Site with occasional recordings of soprano pipistrelle, noctule, Leisler's, serotine, *Myotis* sp. and long-eared bats. Bat activity along the eastern boundary was otherwise relatively limited. Few registrations were also recorded along internal hedgerows H1-H3, although this varied throughout the survey period, with relatively greater levels of activity recorded along H1 and H2 and along the central band of scrub and tall ruderal vegetation within field F1 during May.
- 4.3.27 Levels of bat activity recorded during the automated detector surveys were generally moderate and comprised a total of 11 bat species/species groups, including common pipistrelle, soprano pipistrelle, Leisler's, serotine, noctule, *Myotis* sp., lesser horseshoe, long-eared, Nathusius' pipistrelle, greater horseshoe and barbastelle bats. Greatest levels of bat activity were generally recorded at Location 1 positioned at the woodland edge along the northern boundary of the Site, in contrast to Location 2 positioned at the south-west end of hedgerow H2. The highest number of bat passes were recorded during May. Species diversity was otherwise relatively consistent between locations during the survey period.
- 4.3.28 Overall, poor semi-improved grassland which dominates the Site is considered to be of limited importance to a foraging/commuting bat assemblage given its heavily grazed nature and poor floristic diversity. Additionally, the Wye Valley Link Road which borders the east of the Site has no vegetated linear features and as such, is of negligible importance to a bat assemblage. Suitable habitat for dispersal of a bat assemblage is therefore largely limited to woodland habitat along the northern and western boundaries of the Site. Indeed, bat activity recorded during the course of NBW surveys and automated bat detector surveys appeared to be greatest along these boundaries, with recordings of rarer species including lesser and greater horseshoe and barbastelle bats. This boundary may further be considered of greater importance due to the proximity of the Wye Valley Woodlands SAC and Wye Valley and Forest of Dean Sites SAC, designated for their populations of lesser horseshoe and/or greater horseshoe bats, although



overall, use of the Site by these species was low throughout the survey period. As such, the Site is not currently considered a key/strategic commuting route for these species.

- 4.3.29 Taking into account the diversity of bat species utilising the Site and the extent of their roosting, foraging and commuting activity, and with reference to Bat Mitigation Guidelines 2023, the overall bat species assemblage using the Site is considered to be of Local importance.

### **Dormouse**

- 4.3.30 Hazel dormouse is an EPS receiving strict protection under the Conservation of Habitats and Species Regulations 2017 (as amended) as summarised above in respect of bats. Additional protection is also afforded to this species under the Wildlife and Countryside Act 1981 as summarised above in respect of bats. This species is also listed as a priority species.
- 4.3.31 Seven records for dormouse were returned within 2km of the Site's boundaries during the desk study, with two records returned for woodland habitat along the north-west boundary of the Site, dated 2015 and 2016. Previous nest tube surveys undertaken across the Site in 2012 and 2013 to inform a previous planning application identified dormouse and their nests within the plantation woodland which defines the western boundary of the Site.
- 4.3.32 The habitats on-site are of moderate suitability for dormice, comprising semi-natural and plantation woodland which provides opportunities for breeding, foraging and hibernation. Internal hedgerows provide additional habitat for a dormouse population, albeit sub-optimal due to their predominantly defunct nature, whilst poaching by livestock has eroded a ground flora community, such that this habitat is considered unsuitable for hibernation. Suitable habitat within the Site is, however, largely isolated from the wider landscape by residential development to the north, the A466 to the east and the A48 to the south. There is, however, some arboreal connection between the Site and suitable habitat within the wider landscape to the west, such that some dispersal of dormouse between the Site and off-site habitats is likely.
- 4.3.33 During nest tube surveys, a dormouse nest occupied by an adult male was identified within tube 1 deployed within broadleaved plantation woodland during May 2024. This was in addition to a nest occupied by a juvenile female in tube 2 during June 2024 and a nest occupied by an adult male in tube 14 during October 2024. A dormouse nest was also identified within tube 24 during November 2024. All evidence of dormouse was identified within plantation woodland in the southern half of the Site. A small number of wood mice (*Apodemus sylvaticus*) and evidence of their activity (including nests and food caches) were also recorded.



4.3.34 The dormouse population within the Site is judged to be of Local importance.

### Badger

4.3.35 Badger and their setts are protected under the Protection of Badgers Act 1992, which makes it an offence (inter-alia) to:

- Wilfully kill, injure, take, or cruelly ill-treat a badger; and
- Damage or interfere with a sett, by doing one of the following things:
- Damage a badger sett or any part of it;
- Destroy a badger sett;
- Obstruct access to, or any entrance of, a badger sett;
- Cause a dog to enter a badger sett; or
- Disturb a badger when it is occupying a sett.

4.3.36 The 1992 Act defines a badger sett as *"any structure or place which displays signs indicating current use by a badger"*.

4.3.37 The protection afforded to badger is primarily due to animal welfare issues and history of persecution rather than concerns over their unfavourable nature conservation status.

4.3.38 [REDACTED]  
[REDACTED] Dense scrub, woodland, hedgerow boundaries and poor semi-improved grassland within the Site offers opportunities for badger foraging and sett building. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]




[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 4.3.40 Taking into account the common and widespread status of this species, [REDACTED]  
[REDACTED] the overall population is considered to be of Local level importance.

#### Other Mammal Species

- 4.3.41 Records of the following priority mammal species were returned within 2km of the Site:
- 4.3.42 European hedgehog (*Erinaceus europaeus*) – 92 records returned, the closest record being returned for field F1 within the Site. The majority of the other records are in association with residential housing within Chepstow.
- 4.3.43 Records of other mammal species considered locally important for Monmouthshire include a single record for stoat (*Mustela erminea*) returned 510m south-west of the Site and a single record for weasel (*Mustela nivalis*) returned 1.5km south-east of the Site.
- 4.3.44 The Site encompasses a range of suitable foraging and breeding habitats for these species with woodland, hedgerow, scrub and tall ruderal vegetation providing suitable cover for breeding and hibernation, whilst poor semi-improved grassland comprises a suitable foraging resource. There is a reasonable likelihood that these species are present on-site. The populations of hedgehog, stoat and weasel potentially occurring on the Site are considered to be of Site level importance.

#### Great Crested Newt and Other Amphibian Species

- 4.3.45 Great Crested Newt is an EPS receiving strict protection under the Conservation of Habitats and Species Regulations 2017 (as amended) as summarised above in respect of bats. Additional protection is also afforded to this species under the Wildlife and Countryside Act 1981 as summarised above in respect of bats. This species is also listed as a priority species.
- 4.3.46 Other legally protected amphibians are rare and have a very restricted distribution, however common toad (*Bufo bufo*) is a widespread species which is listed as a priority Species.
- 4.3.47 No records of great crested newt were returned within 2km of the Site. A single record for common frog (*Rana temporaria*) 1.2km north-east was returned, however.



- 4.3.48 Dense scrub and woodland habitat provide suitable foraging and refuge opportunities for great crested newt and other amphibians. In contrast, poor semi-improved grassland is considered sub-optimal for this species given its heavily grazed nature and lack of structural and botanical diversity, offering limited cover from predators and foraging value. Such habitats are isolated from suitable habitat within the wider landscape by residential development to the north, the A466 to the east and A448 to the south, these features considered significant barriers to the dispersal of great crested newt, whilst St Lawrence Lane to the west may present a partial barrier to movement. Furthermore, no waterbodies were identified on-site nor within 500m of the Site following a review of online mapping. Great crested newt is thus presumed absent from the Site.

### Reptiles

- 4.3.49 All species of common reptile, namely common lizard (*Zootoca vivipara*), slow-worm (*Anguis fragilis*), grass snake (*Natrix helvetica*) and adder (*Vipera berus*), receive at least limited protection from harm under the Wildlife and Countryside Act 1981, making it an offence to cause intentional killing and injuring of these species. In addition, these species are also listed as priority species.
- 4.3.50 Six reptile records were returned within 2km of the Site, all relating to slow-worm, with the closest record being 730m east of the Site.
- 4.3.51 Suitable habitat for reptiles within the Site subject to survey is confined to field boundaries, woodland habitat and dense scrub, with poor semi-improved grassland considered sub-optimal habitat for a reptile population given its poor structural and botanical diversity offering limited/no cover from predators and a limited foraging resource. A log pile recorded within the Site provides suitable hibernacula for reptiles, whilst woodland habitat may offer an additional hibernation resource for these species.
- 4.3.52 No reptiles were recorded during detailed refugia surveys undertaken between August and September 2024, indicating they are either absent from the Site or else only present in such small numbers as to be undetectable.

### Invertebrates

- 4.3.53 The desk study returned multiple records for notable invertebrate species within 2km of the Site. These include the Priority Species buff ermine (*Spilosoma lutea*), cinnabar (*Tyria jacobaeae*), grass rivulet (*Perizoma albulata*), large wainscot (*Rhizodra lutosus*), rosy rustic (*Hydraecia micacea*), rustic (*Hoplodrina blanda*), scarce hook-tip (*Sabra harpagula*), small square-spot (*Diarsia rubi*) and white admiral (*Limenitis camilla*).
- 4.3.54 This is in addition to records for species of conservation concern including alder signal (*Stathmopoda pedella*), black-headed cardinal beetle (*Pyrochroa coccinea*), bulrush veneer (*Calamotropha paludella*), pied grey (*Eudonia delunella*) and spindle knot-horn (*Nephoterix angustella*) and locally important species including holly blue (*Celastrina argiolus britanna*), scallop shell (*Rheumaptera undulata*), white-speckled clothes (*Nemapogon koenigi*), silver-washed fritillary (*Argynnis paphia*) and speckled bush-cricket (*Leptophyes punctatissima*).
- 4.3.55 Habitats recorded on-site comprise predominantly poor semi-improved grassland, scrub and tall ruderal vegetation, considered unlikely to support a notable assemblage of invertebrate species given the overall poor botanical and structural diversity, with grassland habitats in particular subject to frequent grazing, limiting establishment of diverse, flowering species. However, hedgerows and woodland are likely to support a more diverse assemblage, with shrubs providing a foraging and breeding resource to certain species. The invertebrate assemblage likely supported by the Site is therefore considered to be no greater than Site level importance.





### Rare/Scarce Plant Species

- 4.3.56 The desk-study returned records for bluebell (*Hyacinthoides non-scripta*) listed under Schedule 8 of the Wildlife and Countryside Act 1981, (as amended) and purple ramping-fumitory (*Fumaria purpurea*) listed under Section 7 of the Environment (Wales) Act 2016 and a red data book species, within 500m of the Site.
- 4.3.57 The desk-study also returned records of several invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981. These included records for wall cotoneaster (*Cotoneaster horizontalis*), three-cornered garlic (*Allium triquetrum*), Japanese knotweed (*Fallopia japonica*), Virginia-creeper (*Parthenocissus quinquefolia*), Himalayan cotoneaster (*Cotoneaster simonsii*) and variegated yellow archangel (*Lamiastrum galeobdolon subsp. argentatum*).
- 4.3.58 No notable or invasive plants were identified within the Site during the Extended Phase 1 habitat survey. The Site is dominated by habitats and floral communities that are relatively common and widespread in Wales and the UK.

### Important Ecological Features

- 4.3.59 Those designated sites, habitats and species requiring consideration within the EclA due to their identification as IEFs valued at or above Local level, are summarised below in Table 4.5. The badger and reptile population, while only valued at a Site level, have been included owing to the legal protection they are afforded.

**Table 4.5: Important Ecological Features Identified within the Site's Potential Zone of Influence**

Feature	Summary Description and Relationship with Site	Level of Importance
Wye Valley Woodlands SAC	Located 840m north-east of the Site. Qualifying features include lesser and greater horseshoe bats and woodland habitat.	European
River Wye SAC	Located 840m north-east of the Site. Designated for its riverine habitats, freshwater fish and invertebrate species and otter.	European
Severn Estuary SPA, SAC and Ramsar	2.6km south-east. Designated for populations of overwintering and migratory birds, populations of migratory fish species and estuarine/intertidal habitats.	International
Wye Valley and Forest of Dean Bat Sites SAC	Closest 3.7km north-east and 3.8km north-west. Designated for its populations of lesser and greater horseshoe bats.	European
River Wye SSSI	Located 840m north-east of the Site. Designated for its aquatic habitats and assemblage of freshwater species including white-clawed crayfish, fish populations and otter, in addition to being of importance for its invertebrate assemblage.	National
River Wye (Lower Wye) SSSI	Located 840m north-east of the Site. Designated for three main aquatic plant community types – rivers on sandstone, mudstone and hard limestone; clay rivers; and lowland rivers with minimal gradient, as well as for certain flowering plants and bryophytes.	National
Pierce, Alcove and Piercefield Woods SSSI	840m north-east. This SSSI supports mixed semi-natural woodland with a relict coppice structure and some standards.	National



Feature	Summary Description and Relationship with Site	Level of Importance
Pennsylvania Fields, Sedbury SSSI	1.3km east. An area of brackish pastureland overlying alluvial soils alongside the lower, tidal part of the River Wye.	National
Beachley Grassland LWS	2km south-east. Plant interest.	National
Restored Ancient Woodland	Adjacent to northern boundary of the Site.	County
Part of Bishop's Barnets Wood SINC	Located 950m north-west of the Site. Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.	County
Crossways Green 2 SINC	Located 980m north of the Site. The site includes ancient woodland and an area of species rich grassland. The SINC also encompasses species-rich grassland.	County
Crossway Green SINC	Located 1.1km north of the Site. A large species rich meadow surrounded on three sides by roads and ancient broadleaved woodland to the west. A veteran oak is present by the eastern boundary and a rich hedgerow is found along the east and southern boundaries.	County
Piercefield Avenue SINC	Located 1.1km north of the Site. This site is a small triangle of semi-natural broad-leaved woodland.	County
Strip of Cockshoot Wood SINC	1.3km north-west. Ancient semi-natural woodland and/or plantation on ancient semi-natural woodland.	County
Piercefield Wood Wildlife Trust Reserve	1.5km north. Native woodland supporting important species including Cosnard's net-winged beetle, lesser and greater horseshoe bats and populations of hazel dormice.	County
Native hedgerows	Hedgerows H1-H3, delineating field boundaries.	Local, priority habitat
Semi-natural broadleaved woodland	Central part of the northern Site boundary.	Local, priority habitat
Bats	Suitable habitats for a foraging/commuting bat assemblage with the northern and western boundary woodland of importance for their dispersal across the Site and wider landscape.	Local
█	Site provides suitable foraging habitat and cover for sett building, █ █	Local
Dormouse	Dormouse confirmed present within broadleaved plantation woodland along western boundary of the Site.	Local



## Future Baseline Conditions

- 4.3.60 It is anticipated that if the Proposed Development did not proceed, land practices would remain the same, with the majority of the Site continuing to be subject to grazing. Habitats and species assemblages would therefore be likely to remain the same. Whilst climate change may influence the distribution of populations of protected and notable species at a landscape level in the long-term, none of the IEFs identified for the Site are at the edge of their natural range such that no changes to the species assemblages within the Site are likely.

## 4.4 Mitigation Measures Adopted as Part of the Project

- 4.4.1 The key inherent mitigation measures included within the Illustrative Masterplan for the Proposed Development include:
- The retention of fields F3, F4, the north-western extents of field F1, and southernmost extent of field F2, forming a significant area of open green space across for recreational use, visual amenity and biodiversity;
  - The proposed retention of semi-natural and plantation woodland and scrub present along the northern and western boundaries of the Site, further enhanced through new ecotone planting along their edge, with such features offset from the development edge by adjacent areas of open green space;
  - The retention of hedgerow H3, the majority of hedgerow H1 (albeit for removal of c.15m to accommodate proposed pedestrian footpaths) and the vast majority of trees, including T1, T6, T15, T24, T36, T38, T59, T62, T64, T65 and T66 with bat roost suitability;
  - The retention of scrub vegetation (G14) along the southern boundary of the Site; and
  - Provision of a number of sustainable drainage features across the southern and western extents of the Site, including attenuation basins and swales, for incorporation into areas of open green space adjacent, in addition to SUD features proposed in association with residential parcels.

## 4.5 Assessment of Construction Effects

- 4.5.1 Potential significant effects which could arise as a result of the construction of the Proposed Development, in the absence of mitigation, include the following:
- Effects of direct habitat loss and fragmentation due to land-take upon habitats and species;
  - Indirect effects to designated sites, habitats and species due to habitat degradation and damage;
  - Effects of light, noise and human disturbance to habitats and species as a result of construction activities;
  - Increased risk of collision to species arising from the operation and movement of construction vehicles and plant;
  - Pollution of groundwater and surface water flows as a result of spillages from a variety of construction sources; and
  - Changes in air quality following mobilisation of pollutants to the atmosphere with subsequent indirect effects on those habitats sensitive to Nitrogen (N), nitrous oxides (NOx) and/or ammonium (NH3) disposition during construction.

## Statutory Designations

- 4.5.2 The HRA prepared for MCC's Replacement LDP Preferred Strategy (albeit not yet adopted) in September 2024 (AECOM, 2024), considered likely significant effects to arise through allocated development and



policies on European sites, including Policy HA3 concerning proposed development of the Site itself ('Land at Mounon Road, Chepstow'). Pertinent to the Site, the HRA considered effects upon the Wye Valley Woodlands SAC, River Wye SAC, Wye Valley and Forest of Dean Bat Sites SAC and Severn Estuary Ramsar Site/SAC/SPA. In particular, five main impact pathways that may have potential for significant effects on the integrity of designated sites within the Site's ZOI have been identified.

- 4.5.3 The screening found that for the majority of site allocations and policies inherent within the Replacement LDP, there are no pathways for development to give rise to likely significant effects, either alone or in combination, in relation to most European Sites. However, the following effects upon European designations pertinent to this EIA required further investigation within an Appropriate Assessment:
- Atmospheric pollution (due to an increase in traffic generation) – Wye Valley Woodlands SAC and the Severn Estuary SAC/SPA/Ramsar;
  - Recreational pressure (due to the local population growth) - Severn Estuary SAC/SPA/Ramsar, River Wye SAC and Wye Valley Woodlands SAC;
  - Loss of functionally linked land (due to the allocation of greenfield sites for development) - Severn Estuary SPA/Ramsar and Wye Valley and Forest of Dean Bat Sites SAC;
  - Water quality (due to increases in sewage effluent and industrial pollutant input) - River Wye SAC and Severn Estuary SAC; and
  - Water quantity, level and flow (due to an increased abstraction of water for dwellings and employment space) - River Wye SAC and Severn Estuary SAC.
- 4.5.4 Overall, however, it was concluded that subject to amendments to the Local Plan, Monmouthshire's policy framework would ensure that no adverse effects would arise on European sites either alone or in combination with other plans and projects.
- 4.5.5 At the Site level, the Site is sufficiently distant from European statutory designations, such that no direct impacts associated with habitat loss/damage during the construction phase of the Proposed Development are anticipated to arise. Habitats recorded within the Site are, furthermore, not considered to provide functionally linked land for qualifying species of the River Wye SAC and River Severn Ramsar Site/SAC/SPA. Specific to qualifying bird species of the Severn Estuary SPA, heavily sheep grazed agricultural grassland which dominates the Site is considered unlikely to support a significant assemblage of overwintering species utilising the Site for foraging and roosting, given its species-poor nature and lacking in structure.
- 4.5.6 There is, however, the potential for indirect effects to arise during the construction phase in respect of atmospheric pollution, water quality and loss of functionally linked land in relation to populations of lesser and greater horseshoe bats associated with Wye Valley Woodlands SAC and Wye Valley and Forest of Dean Bat Sites SAC. Such effects are further discussed below in relation to each European designation within the ZOI of the Site.

#### **Wye Valley Woodlands SAC, Wye Valley and Forest of Dean Bat Sites SAC and Pierce, Alcove and Piercefield Woods SSSI**

- 4.5.7 The Wye Valley Woodlands SAC is subdivided into several distinct component units, the closest of which is located 840m north-east of the Site and which partially overlaps with the boundary of Pierce, Alcove and Piercefield Woods SSSI. This SAC is designated for its Annex I woodland habitats, whilst populations of lesser horseshoe bat are also a qualifying feature of this designation. With respect to the Wye Valley and Forest of Dean Bat Sites SAC, this SAC is located 3.7km north-east and 3.8km north-west at its closest point and is designated for its populations of lesser horseshoe and greater horseshoe bat.
- 4.5.8 Given the sensitivity of habitats supported by Wye Valley Woodlands SAC and Pierce, Alcove and Piercefield Woods SSSI to nitrogen disposition, there is the potential for indirect impacts to arise during the construction phase of development following an increase in traffic levels along affected roads within 200m



of international statutory designations, with harmful emissions (N, NO<sub>x</sub> and NH<sub>3</sub>) released into the atmosphere.

- 4.5.9 The A466 (connecting Chepstow with Monmouth) aligning the eastern boundary of the Site traverses Wye Valley Woodlands SAC circa 3.7km to the north. A review of APIS (APIS, 2025) indicates the critical level for ammonia adjacent to this road has been exceeded, whilst the total critical load for N is at or just below its maximum, although input of such compounds is recorded as primarily being from farming practices rather than transport. However, traffic modelling undertaken by Rappor Consultants Ltd. to inform air quality impacts estimates the potential increase in traffic associated with the proposed development, measured as Average Annual Daily Traffic Flow (AADT), will be nil for Heavy Goods Vehicles (HGVs), in respect of the A466 extending north of the development (St Lawrence Road, north of Mounon Road). This is below the threshold change in traffic of 200 for HGVs advocated by Highways England in their Design Manual for Roads and Bridges (DMRB) (Highways Agency, 2008) and adopted by Natural England as screening criteria, below which any emissions are widely considered to be imperceptible. As such, likely significant effects on the Wye Valley Woodlands SAC associated with air quality are considered unlikely.
- 4.5.10 With respect to populations of lesser and greater horseshoe bats associated with Wye Valley and Forest of Dean Bat Sites SAC, the Site lies beyond the Juvenile Sustenance Zone and Core Sustenance Zone for both species. A component unit of the Wye Valley Woodlands SAC occurs c.840m from the Site, where populations of lesser horseshoe bat are supported, although this is also outside the Juvenile Sustenance Zone for lesser horseshoe bat but is within the Core Sustenance Zone. As such and in the absence of mitigation, there is the potential for development to result in the loss/damage/degradation of potentially functionally linked habitats present within the Site, assessed as being of moderate suitability for foraging and commuting bats.
- 4.5.11 However, whilst both lesser and greater horseshoe bats were encountered onsite during the course of automated detector surveys in 2024, these species accounted for less than 1% of overall bat activity. Poor semi-improved grassland which dominates the Site is considered to be of limited importance to a foraging/commuting bat assemblage given its heavily grazed nature and poor floristic diversity. Additionally, the Wye Valley Link Road which borders the east of the Site has no vegetated linear features and as such, is of negligible importance to a bat assemblage. Suitable habitat for dispersal of a bat assemblage is therefore largely limited to broadleaved and plantation woodland habitat along the northern and western boundaries of the Site respectively, proposed for retention and which will be offset from built development through inclusion of significant areas of open green space. Hedgerow H2 comprising a species-poor, defunct hedgerow will, however, be removed to facilitate development (amounting to c.180 linear metres) with further removal of c.15m of hedgerow H1 to accommodate footpath links. Overall, effects associated with loss/damage/degradation of potentially functionally linked habitats, in the absence of mitigation, are considered negative, direct, permanent, long-term, irreversible and significant at the Local level only.
- 4.5.12 There remains the potential for indirect disturbance (particularly light spill) upon retained commuting/foraging habitat used by lesser and greater horseshoe bats associated with these designations during construction. Such disturbances arising can be intermittent, frequent, and/or constant throughout the construction period. However, given that the majority of the works will be undertaken during daylight hours, the use of artificial lighting will likely be limited to the early morning and early evening hours, with greater requirements for artificial lighting during the winter months when bats are less likely to be active. In the absence of mitigation, potential effects arising from indirect light disturbance upon populations of lesser and greater horseshoe bats utilising the Site are indirect, temporary and reversible in the short-medium term, and therefore considered to be negative at the Site level only.



### **River Wye SAC/SSSI and Severn Estuary Ramsar Site/SAC/SPA, Pennsylvania Fields, Sedbury SSSI and Beachley Grassland LWS**

- 4.5.13 The River Wye SAC (and overlapping River Wye SSSI) is located c.840m north-east of the Site at its closest point and flows approximately north to south through Chepstow, before discharging into the Severn Estuary Ramsar Site/SPA/SAC approximately 2.6km downstream of the Site. Of further pertinence, the Pennsylvania Fields, Sedbury SSSI, is located downstream of the Site and is designated for its brackish pastureland overlying alluvial soils alongside the lower, tidal part of the River Wye. Beachley Grasslands LWS is similarly located downstream and adjacent to the River Wye, designated for its plant interest.
- 4.5.14 In the absence of mitigation, there is the potential for indirect impacts upon qualifying features of these designations associated with increased contaminated surface water run-off during the construction phase of development which could be transferred further downstream to these designations via any surface or ground water connections in the wider landscape. Pollution incidents could also arise as a result of leaks and spills from construction activities, resulting in the introduction of hydrocarbons and other contaminants from demolition activities, site plant or of sediment loads arising from dust deposition or spoil movement. Such impacts would give rise to negative effects on a freshwater ecosystem more generally with potential for fish kills to occur, reduced diversity of a macroinvertebrate community and changes in the composition of a plant community.
- 4.5.15 Whilst it is not possible to predict accurately the full ecological impact of a contamination/pollution event occurring onsite given that its scale and extent cannot be predicted, in the absence of mitigation negative effects are considered possible and may be considered indirect, temporary and reversible in the short-medium term. Whilst such designations are valued at International/National level, given the small scale and extent of anticipated impacts, along with the spatial separation of the sites, such potential effects are considered to be significant at Local level only.
- 4.5.16 Additionally, given the A48 crosses the River Wye SAC/SSSI in Chepstow, there is the potential for a deterioration in local air quality and subsequent effects upon sensitive habitats associated with the River Wye SAC during the construction phase of development following an increase in construction traffic levels and thus and harmful emissions (nitrous oxides (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>) to the atmosphere. Such compounds can impact water quality through a reduction in oxygen levels in waterbodies, leading to eutrophication with subsequent changes in aquatic communities. Freshwater environments are, however, typically phosphorus-limited such that increased loading of nitrogen-based compounds to this aquatic environment is unlikely to have an effect on freshwater communities with such indirect, permanent, long-term, negative effects considered negligible.

### **Non-statutory Designations**

- 4.5.17 Restored ancient woodland adjacent to the northern boundary of the Site will be retained in full such that no impacts associated with habitat loss are predicted. Indirect degradation impacts, such as soil compaction, damage to root protection zones and encroachment by machinery from adjacent construction works may, however, occur, which may in turn result in death or disease, and a decline in the regulatory ecosystem services provided by such habitats. In the absence of mitigation, the extent and magnitude of such indirect short-medium term, potentially permanent and irreversible impacts is uncertain and in the absence of mitigation, may result in negative effects at up to a Local level.
- 4.5.18 Given the sensitivity of ancient woodland habitat to nitrogen disposition, there is the potential for indirect impacts to arise upon this feature following a mobilisation of dust during construction activities within 250m of the Site. In the absence of mitigation, such effects are considered negative, indirect, temporary and reversible, short-medium term at the Local level.
- 4.5.19 Of further pertinence, the A48 passes within 200m of two parcels ancient semi-natural woodland parcels situated circa 190m and 300m to the south-west of the Site. There is also the potential for air quality



effects to arise upon sensitive habitats (including woodland and ancient woodland) associated with Piercefield Avenue SINC, Crossways Green 2 SINC and Crossways Green SINC as a result of increased traffic during the construction phase of development, given the location of these SINC's within 200m of the A466. As discussed in relation to statutory designations, however, such effects are considered to be negligible given the predicted change in AADT for HGV falls below the threshold at which significant effects are likely to occur, adopted by Natural England.

- 4.5.20 Indirect impacts associated with elevated noise and lighting upon RAW adjacent to the Site are also anticipated with subsequent negative effects on protected/notable species supported therein. In the absence of mitigation, such effects are considered negative, indirect, temporary and reversible, short-medium term at the Site level.
- 4.5.21 With respect to remaining non-statutory designations within the ZOI of the Site, these are sufficiently distant from Site boundaries such that no physical impacts associated with loss and degradation are anticipated whilst, for the majority, there are no pathways along which indirect effects are likely to occur.

## Habitats

- 4.5.22 The Illustrative Masterplan has sought to minimise impacts associated with habitat loss as far as possible through confining losses primarily to the interiors of poor semi-improved grassland fields of generally low botanical interest across fields F2 and part of F1, combined with the retention of semi-natural broadleaved and plantation woodland around the peripheries of the Site, full retention of hedgerow H3 and partial retention of hedgerow H1. The full length of hedgerow H2 will, however, necessarily be removed to facilitate construction of the proposed development, alongside the required loss of trees T3, T10, T11, T12, T18, H19, H20, T21, T22, G25, G26, G27, G28, G29, G30, T32 and T33 and partial loss of G51 and H58, as detailed within EDP's Arboricultural Impact Assessment (Appendix 4.2). Such losses will reduce the quantum of habitats available to protected/priority species and potentially limit their dispersal across the Site and wider landscape, otherwise required to maintain genetically viable populations necessary to offset the effects of climate change and maintain healthy ecosystems.
- 4.5.23 Overall, while the loss of locally valuable hedgerows, trees/tree groups has been minimised as far as possible, in the absence of mitigation, the effect is characterised as being negative, direct, permanent, irreversible and long-term at a Local level.
- 4.5.24 In addition to direct habitat loss, retained hedgerows, woodland and trees may be subject to indirect degradation impacts, such as soil compaction, damage to root protection zones and encroachment by machinery from adjacent construction works. In the absence of mitigation, the extent and magnitude of such indirect short-medium term, potentially permanent and irreversible impacts is uncertain and may result in negative effects at up to a Local level.
- 4.5.25 Indirect effects associated with increased levels of disturbance, will likely occur during the construction phase through the use of lighting and increased levels of vehicular traffic, machinery use and plant movement. Such disturbances arising can be intermittent, frequent, and/or constant throughout the construction period. Given that the majority of the works will be undertaken during daylight hours, the usage of artificial lighting will likely be limited to the early morning and early evening hours, with greater requirements for artificial lighting during the winter months. This could potentially impact upon valued habitats and the species using them (see below). In the absence of mitigation, such effects on valued habitats are considered to be negative, indirect, temporary, reversible, occurring in the short-medium term and significant at the Site level only.

## Breeding Birds

- 4.5.26 With respect to breeding birds there is the potential for harm/injury of these species and damage/destruction of active nests, if vegetation clearance/construction were undertaken during the





nesting bird season (March-August inclusive). However, the legal protection afforded to birds and their nests (their eggs and young) is considered inherent mitigation to ensure no impacts relating to direct harm/injury arise in respect of the breeding bird assemblage. Therefore, the damage or destruction of active bird nests during construction is not considered to be significant.

- 4.5.27 Land take associated with the Proposed Development will result in the permanent loss of species-poor grazing pasture of limited importance to a bird assemblage for foraging and breeding during both the summer and winter months. Such habitat is considered unsuitable for a breeding bird assemblage including ground nesting birds given frequent disturbance from grazing livestock which would deter the establishment of nests such that loss of this habitat is not considered significant. Construction of the Proposed Development will, however, result in the loss of circa 195 linear metres of hedgerow habitat and trees T3, T10, T11, T12, T18, H19, H20, T21, T22, G25, G26, G27, G28, G29, G30, T32 and T33, together with partial loss of tree groups G51 and H58 of value as a foraging and nesting resource, with further potential for degradation of retained habitats in proximity to the construction footprint including woodland, hedgerows and trees/tree groups. In respect of the magnitude of such habitat loss and degradation combined with the importance of a breeding bird assemblage onsite, in the absence of mitigation, such impacts are considered negative, indirect, permanent and irreversible in the long-term, significant at the Local level.
- 4.5.28 In the absence of mitigation, disturbance of nesting and foraging habitat for the breeding bird assemblage through light spill, noise, visual and human disturbance during construction could potentially occur. Nesting birds sensitive to such disturbance could abandon nests and breeding territories and become displaced from other populations. Birds will be most sensitive to noise and visual disturbance occurring in the vicinity of habitats during the breeding bird season, though will likely return to such suitable habitat upon cessation of such disturbances. In absence of mitigation, negative effects arising from visual/noise/human disturbance during the construction phase upon birds are considered negative, indirect, temporary, reversible short-medium term and of Site level significance only.

### Roosting/Foraging/Commuting Bats

- 4.5.29 With respect to roosting opportunities available within the Site, a total of 12 trees or tree groups were identified during the GLTA as requiring further assessment or having PRFs for bats. Of those subject to further survey due to their potential to support multiple bats/maternity roosting or because they are likely to be affected by development proposals, four trees were considered to have feature(s) capable of supporting individual bats (PRF-I suitability: T15, T38, T59, T62) and six as having feature(s) capable of supporting multiple bats (PRF-M suitability: T1, T6, T24, T36, T64, T65), with one tree requiring further assessment prior to confirming status (T66). All trees with bat roost potential are proposed for retention such that there will no impacts associated with loss of potential roosts.
- 4.5.30 Manual transect and automated bat activity surveys have confirmed that the Site supports low-moderate levels of foraging and commuting activity dominated by common and widespread bat species, although several rarer and/or less widespread species including serotine, lesser horseshoe and Leisler's bats. Habitats considered most important to the local bat assemblage include the woodland edge forming the western and northern boundaries of the Site, with bat activity noted to be greatest here. Few registrations were also recorded along internal hedgerows H1-H3, although this varied throughout the survey period, with relatively greater levels of activity recorded along H1 and H2 and along the central band of scrub and tall ruderal vegetation within field F1 during May.
- 4.5.31 Hedgerows H3 and the majority of H1 will be retained and offset from the Proposed Development through retention of a significant area of green space across the north-western extents of the Site. Hedgerow H2 will, however, be removed to facilitate construction of the Proposed Development, reducing the total habitat resource available to a foraging/commuting bat assemblage. In the absence of mitigation effects associated with loss or fragmentation of foraging habitat and dispersal corridors are considered negative, direct, permanent and irreversible and long-term at a Local level.



- 4.5.32 With respect to those habitat features to be retained, degradation through damage and disturbance during the construction phase could result in the further loss of roosting and breeding sites in addition to habitat importance for foraging, dispersal and migration. In the absence of mitigation, the effects upon bats are considered to be negative, indirect, potentially permanent and irreversible occurring in the short-medium term and significant at a Local level.
- 4.5.33 Indirect disturbance (particularly light spill) upon potential tree roosts and commuting/foraging habitat may arise during construction. Such impacts can affect species through their physiology (such as through increased heart rates, metabolism and stress), and through their behaviour (such as through forced dispersal and/or displacement). Impacts could result in the abandonment of roosts, foraging territories and of commuting and dispersal corridors, which could significantly affect those species supported by the Site. Such disturbances arising can be intermittent, frequent, and/or constant throughout the construction period. However, given that the majority of the works will be undertaken during daylight hours, the use of artificial lighting will likely be limited to the early morning and early evening hours, with greater requirements for artificial lighting during the winter months when bats are less likely to be active. Overall, and in the absence of mitigation, potential effects arising from indirect light disturbance upon the local bat assemblage are indirect, temporary and reversible in the short-medium term, and therefore considered to be negative at the Site level only.

### Dormouse

- 4.5.34 The proposed removal of hedgerow H2 (c.180 linear metres) and two sections of hedgerow H1 (c.15m total length to accommodate footpath links) and any areas of connecting dense and scattered scrub will result in a reduction in the availability of suitable habitat for dormouse. Such losses have, however, been minimised through the retention of more suitable habitat present on-site including semi-natural broadleaved and plantation woodland delineating the northern and western boundaries of the Site respectively. In so doing, connectivity between the Site and suitable habitat in the wider landscape will be maintained. In the absence of mitigation, such minor losses are considered negative, direct, permanent, irreversible and long-term and significant at the Local level.
- 4.5.35 As previously discussed above in relation habitats, there is the potential for further physical damage and/or indirect degradation of retained features to occur during construction with such effects, in the absence of mitigation, considered negative, indirect, potentially permanent and irreversible occurring in the short-medium term and significant at a Local level
- 4.5.36 Increased risk of collision may also arise during the construction period, resulting in direct harm to dormouse during the works. In absence of further mitigation such impacts considered negative, direct, permanent and irreversible at the Local Level.
- 4.5.37 Indirect disturbance (particularly light spill) retained habitat may arise during construction with such un mitigated effects considered indirect, temporary and reversible in the short-medium term, and therefore considered to be negative at the Site level.

### Badger

- 4.5.38 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] semi-improved grassland which dominates the Site provides a foraging resource for this species whilst hedgerow and woodland corridors provide potential wildlife corridors for the dispersal of badger across the Site and wider landscape.
- [REDACTED]  
[REDACTED]



- 4.5.41 Whilst construction will result in negative effects to badger and their setts valued at the local level, this species remains common and widespread within the county and the United Kingdom, such that any such effects upon its conservation status are not considered to be significant and are only considered here given its legal protection. Therefore, while there would be a permanent, long-term, negative effect at a Site level, in the absence of mitigation, this is not significant in EIA terms.
- 4.5.42 Poor semi-improved grassland land which dominates the Site provides a foraging resource for this species, whilst woodland habitat and hedgerows provide potential wildlife corridors for the dispersal of this species across the Site and wider landscape. Whilst boundary features will largely be retained, maintaining connectivity for the dispersal of badger, land take associated with the development proposals will result in the permanent loss of agricultural land which otherwise provides a foraging resource to this species. As discussed above in relation to their setts, badger remains common and widespread within the county. Therefore, while there would be a permanent, long-term, irreversible negative effect at a Site level in the absence of mitigation, this is not significant in EIA terms.

### Further Mitigation

- 4.5.43 This section sets out the principles of the avoidance, mitigation or compensation measures required to reduce any potential ecological effects to insignificant levels during the construction phase. Overall, many potential adverse effects have been avoided or reduced through inherent mitigation incorporated into the Illustrative Masterplan and Green Infrastructure/Landscape Strategy for the Proposed Development, along with the spatial separation from designated sites.
- 4.5.44 Not all potential adverse effects can be avoided or reduced in severity through inherent mitigation alone. This section identifies any additional mitigation measures required to avoid, reduce or offset the potential for such significant adverse effects. The key mechanisms described will include measures to:
- Conform with relevant and pertinent legislative requirements, particularly those associated with legally protected species; and
  - Deliver and maximise opportunities for biodiversity enhancement and gain through the Proposed Development.

The key mechanisms which will be implemented are:

- **Detailed Design Measures:** The outline planning application is being made with all matters reserved apart from access. The Illustrative Masterplan allows flexibility for specific detailed design measures to be secured and included within the Proposed Development. Such design measures can, where necessary, be agreed with the LPA and secured through suitably worded planning conditions and addressed at future Reserved Matters stages. The Illustrative Masterplan and supporting Green Infrastructure/Landscape Strategy, however, secures the inherent mitigation measures incorporated within the scheme;
- **Construction Environment Management Plan (CEMP) and / or Ecological Construction Method Statement (ECMS) and Detailed Landscape Scheme:** Further detailed measures will be set out with respect to the management and control of the construction phase of the Proposed Development to ensure protection of IEFs. In general, the ECMS will include mechanisms to ensure the sensitive siting of work compound(s) and storage areas, including the storage of any fuel, chemicals, plant or



machinery, sensitive clearance of the Site and the use of artificial lighting (including security lighting). A timetable of all key tasks to be undertaken as part of the pre-construction and construction work will be provided, taking into account all species and habitat sensitivities. It is proposed that the methodologies prescribed within the ECMS will be overseen by an appointed Ecological Clerk of Works (ECoW), whose scope and remit will be set out within the ECMS and any future development licence granted by Natural Resources Wales in respect of dormouse and badger. The ECMS will also identify clearly the responsibilities of key personnel including the Site manager(s) and the ECoW. The ECMS and appointment of the ECoW should be secured by way of a suitably worded planning condition; and

- **Landscape and Ecology Management Plan (LEMP) and Mitigation Strategies (Including Derogation Licensing):** A site-wide LEMP will be provided which includes the post-construction management of landscape, arboricultural, and biodiversity elements in order to ensure that a holistic approach is adopted. The LEMP should be secured by way of a suitably worded planning condition. In addition, a detailed mitigation strategy for dormouse will be prepared to inform an European Protected Species Development Licence application, should planning consent be forthcoming, and will set out the recommended compensation, mitigation and enhancement measures to be implemented as part of the Proposed Development, to ensure legal compliance and ensure no significant adverse effects will arise upon this species. The proposed further mitigation measures in respect of the potentially adverse effects arising during the construction and occupation of the completed Development are described below.

- 4.5.45 All necessary ecological surveys are considered current at the time of submission, however where relevant and depending on timescales, certain detailed species surveys may require updating prior to commencement of the relevant stage of the Proposed Development. The findings will be used to inform the measures set out below.

### Statutory Designations

- 4.5.46 As discussed above, inherent within the Illustrative Masterplan is the retention of those habitat features of greatest importance to a lesser and greater horseshoe population associated with Wye Valley Woodlands SAC and Wye Valley and Forest of Dean Bat Sites SAC including:
- The proposed retention of broadleaved semi-natural and plantation woodland present along the northern and western boundaries of the Site, to be further enhanced through the provision of new ecotone planting along their edge, with such features offset from the development edge by adjacent areas of open green space;
  - The retention of hedgerow H3, the majority of hedgerow H1 (albeit for removal of c.15m to accommodate proposed pedestrian footpaths) and trees with bat roost suitability; and
  - The retention of scrub vegetation (G14) along the southern boundary of the Site.
- 4.5.47 This is combined with the retention of fields F3, F4, the north-western extents of field F1, and southernmost extent of field F2 which provide opportunities for the creation of new and/or enhancement of existing habitats of value as foraging/roosting resource for populations of lesser and greater horseshoe bats.



- 4.5.48 Proposed habitat creation/enhancement measures include:
- The provision of new tree, hedgerow, shrub, scrub and grassland planting within areas of open green space proposed across the southern and western extents of the Site to compensate for habitat loss;
  - The provision of ecotone planting adjacent to retained woodland edges forming the northern and western boundaries of the Site, with such planting to include canopy and understorey tree and shrub planting, transitioning into lower-level shrub and grassland planting towards the development edge, and incorporating flowering and fruiting species of local provenance and species resilient to climate change. Such ecotone planting seeks to protect retained woodland habitats to enable its continued function as a key wildlife corridor for dormouse, bats, and other wildlife; and
  - The planting/seeding of sustainable drainage features across the site, utilising wetland species, increasing foraging opportunities for a bat assemblage.
- 4.5.49 Such habitat creation measures, to be secured within a detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent, are considered sufficient to compensate for the small scale of habitat losses anticipated, whilst ensuring the enhancement of retained habitats to maximise habitat function and connectivity across the Site for a bat assemblage associated with statutory designations.
- 4.5.50 To protect retained habitats comprising functionally linked habitat during construction, protective fencing will be erected as recommended within BS 5837: 2012 Trees in Relation to Design, Demolition and Construction to physically protect retained trees and hedgerow habitats on-site, together with the establishment of EPZs. Protective fencing will incorporate the full RPA of the feature to be retained and will be protected and maintained throughout the duration of all site-enabling and pre-construction activities.
- 4.5.51 No works (other than planting), including the storage of materials, plant and machinery, will be carried out within or immediately adjacent to all areas of protective fencing/areas marked for protection as described above, so as to ensure no detrimental impacts to sensitive features arising from physical damage and/or pollution. The digging of trenches and pits for new tree and scrub planting adjacent to areas of protective fencing, where this lies inside RPAs, will be carried out by hand only, in accordance with best practice guidance as stipulated within BS 5837:2012.
- 4.5.52 Construction will also be limited to daylight hours as far as possible to mitigate effects of increased visual and noise disturbance upon retained habitats of value to a greater and lesser horseshoe bat assemblage, with the use of temporary, artificial lighting avoided during the hours between dusk and dawn, and with directional and low-level lighting used away from sensitive habitat corridors to mitigate effects relating to increased use of artificial lighting.
- 4.5.53 To protect water quality of wetland and/or pollution sensitive habitats associated with statutory designations, including the River Wye SAC/SSSI during the construction phase, appropriate pollution control measures will be employed in accordance with the relevant Pollution Prevention Guidelines (PPGs) published by the Environment Agency, namely PPG1 'General guide to the prevention of pollution', PPG5 'Works and maintenance in or near water', PPG6 'Pollution prevention guidance for working at construction and demolition sites', and PPG21 'Pollution incident response planning', to ensure that detrimental effects on nearby watercourse as a result of surface run-off, spillage and pollution arising throughout the construction phases are avoided. While these documents have been withdrawn by the Environment Agency, they are still considered to provide the benchmark for pollution prevention.
- 4.5.54 In respect of dust mobilisation and management of potential atmospheric contaminants during construction, appropriate pollution control measures will be employed with reference to BRE Report 456: "Control of dust from construction and demolition activities". In addition, the following measures will be implemented (as required) to minimise the potential for pollution to arise from dust-emitting activities during the pre-construction and construction phase of development: the restriction of traffic movement; spraying of road surfaces/stockpiles during dry weather; storage of materials in sheltered locations; and



the use of screens and barriers to be erected around dusty activities or along boundaries of the construction footprint where there is a significant risk of dust mobilisation. Further measures to minimise emissions during construction activities are detailed within the Air Quality Assessment prepared by Rappor Consultants Ltd, submitted as a standalone report with this planning application.

- 4.5.55 Implementation of the above mitigation will ensure that likely residual effects on statutory sites are negligible.

### **Non-statutory Designations**

- 4.5.56 Subject to implementation of the mitigation previously discussed in relation to statutory designations, including installation of protective fencing and adoption of pollution control measures during construction, likely residual effects upon non-statutory designations and will be negligible.

### **Habitats**

- 4.5.57 As previously discussed in relation to statutory designations the retention of fields F3, F4, the north-western extents of field F1, and southernmost extent of field F2, provide opportunities for creation of new and/or enhancement of existing habitats to deliver greater benefits to protected/notable species and biodiversity more generally. New tree planting in particular is proposed at a minimum replacement ratio of 3:1 standard, broadleaved trees, in accordance with PPW.
- 4.5.58 It is further recommended for such habitats and features to be subject to sensitive management and monitoring over the long-term to increase their resilience and mitigate long-term disturbance effects, with proposed measures to include:
- The implementation of a sensitive grass cutting regime across newly created areas of informal grassland and wildflower meadow planting, so as to promote a structurally diverse and species-rich sward, which also maximises the value of foraging, dispersal, breeding and hibernation resources for protected/notable species;
  - The management of retained hedgerows to maintain their condition and promote structural diversity, including rotational cutting and the implementation of coppicing and/or traditional laying of the hedgerow where appropriate according to species, to encourage the formation of a denser and more continuous hedgerow;
  - The management of newly created hedgerows and ecotone planting to achieve a continuous (<10% gaps), dense and bushy 'A' shaped structure whilst maintaining heights at no less than 3m and widths of at least 2m, once established;
  - The selective removal of scrub around establishing young trees/shrubs to facilitate natural regeneration across retained and newly created habitats; and
  - The provision of log piles and deadwood utilising arisings from tree works undertaken on Site, so as to maximise habitat structure and foraging availability for protected and notable species.
- 4.5.59 In addition to those measures described above in relation to statutory designations, the following additional habitats are proposed in association with the built development footprint:
- Shrub and ornamental planting of formal landscape areas to soften edges of built development and integrate development within the landscape;
  - Ornamental and native plug planting in association with Sustainable Drainage features at street level;
  - Street tree planting throughout the development; and
  - Provision of formal and informal grassed areas in association with public open space and play areas.



- 4.5.60 Detailed specifications for new planting and other habitat creation can be provided with a future, detailed Soft Landscaping Scheme secured by planning condition. In addition, measures to restore and enhance existing habitats, to ensure the successful establishment of new habitats created, and to maintain the value of all ecological features in the long-term which are necessary to ensure their continued ecological functionality and contribution to the biodiversity of the Site, will be delivered through a LEMP which can be secured by planning condition.
- 4.5.61 Subject to the implementation of the measures summarised above and previously discussed in relation to statutory and non-statutory designations, impacts upon retained habitats will be adequately mitigated, whilst net benefits for biodiversity and ecosystem resilience can be achieved in accordance with relevant national and local planning policy and legislation. Overall, residual construction effects are considered negligible, with proposed habitat creation likely to deliver beneficial, permanent, long-term effects at up to a Local level (considered to be significant in EIA terms).

### Species IEFs

- 4.5.62 Protection of species during construction will be ensured through the provisions of the ECMS. As a general measure aimed at protecting species, 'tool box talks' will be provided by a suitably qualified ecologist to the principal contractor appointed by the developer, for distribution to all employees involved in any enabling works /vegetation clearance, to ensure that identification and protection of the relevant species and their habitats is understood prior to commencement.
- 4.5.63 Construction activities will be limited to daylight hours as far as possible to minimise disturbance to foraging and commuting habitats of value to bats, birds and the use of lighting restricted. Where this is not possible (i.e. for security purposes) lighting will be directional, timed and low-lux, with internal/external shields installed as necessary to ensure minimal light spillage upon retained habitats, both within and adjacent to the development edge. Timed lighting will be programmed to ensure adequate dark periods between dusk and dawn across the Site, particularly adjacent to peripheral vegetation.
- 4.5.64 Additional sensitive methodologies will be set out within the ECMS to control traffic and movement, thereby reducing the likelihood of collision impacts occurring.
- 4.5.65 The ECMS will also specify that during construction works, any open excavations (e.g. foundations or utility trenches) are to be covered overnight, or if this is not possible then fitted with a means of escape for small mammals (e.g. an angled board) to prevent badger, or hedgehog from becoming trapped.
- 4.5.66 In addition to the habitat protection measures described above, which will deliver much of the necessary species protection, further measures to be included in the ECMS for each species group are summarised below.

### Breeding Birds

- 4.5.67 Retained bird nesting habitats will be included within Ecological Protection Zones (EPZs). This is considered necessary to ensure the avoidance of impacts upon the local breeding bird assemblage given their likely association with those habitats retained including woodland, scrub and trees whilst those habitat creation and enhancement measures detailed above will compensate for loss of suitable nesting and bird habitat whilst providing a more diverse foraging resource compared to baseline conditions.
- 4.5.68 Given the protection afforded to all breeding birds, their nests, eggs and young, sensitive vegetation clearance (and building demolition) required during the pre-construction and construction phases of development should ideally be timed to avoid the main bird breeding season (i.e. March to August inclusive). Should this seasonal constraint prove impracticable and/or conflict with other protected species requirements however, then vegetation clearance outside of this period (i.e. September to February inclusive) will commence following the advice and under supervision of a suitably qualified ecologist. Pre-commencement checks for active nests will be required prior to any vegetation clearance occurring during





the main bird breeding season, with appropriate buffers marked out around any active nests or nests under construction, until all eggs have hatched and chicks fledged. Such protection measures in relation to breeding birds will be included within the ECMS prepared for the Site.

- 4.5.69 Following implementation of proposed mitigation as detailed above, likely residual effects on the bird assemblage from disturbance and direct harm or injury are considered to be negligible, while high quality habitat creation and management have the potential to deliver beneficial, permanent and long-term effects at the Site level (considered to be not significant in EIA terms).

#### **Roosting/Foraging/Commuting Bats**

- 4.5.70 All trees/tree groups with bat roost potential will be retained within the Proposed Development. Nevertheless, given the potential for new features to develop over time and/or should those specimens to be retained require pruning/cutting back, all suitable semi-mature trees to be felled/subject to tree pruning will be subject to an update ground-level inspection by a suitably qualified ecologist to determine their current potential to support roosting bats. Where trees are identified as having potential to support roosting bats at the time of the update survey, then such trees will be subject to a further detailed aerial inspection, whereby all suitable roosting features will be checked at height for the presence of bats. Aerial surveys will be undertaken by a suitably qualified and NRW bat licensed ecologist, arboricultural contractor with a NRW bat survey licence, or with experience of working with bats and under the supervision of a NRW bat survey license holder. If any bats are discovered during the aerial inspection, owing to the strict legal protection afforded to bats and their roosts, works are likely to require a further EPS Development Licence from NRW before works can continue with provision of compensatory roosting features.
- 4.5.71 In respect of potential effects associated with damage and disturbance of retained trees with bat roost potential, in addition to hedgerows of value as a commuting and foraging resource, such features will be included within EPZs throughout construction. In addition, construction lighting will be kept to a minimum and kept away from EPZs with sensitive lighting details to be secured within the ECMS.
- 4.5.72 With respect to a foraging/commuting bat assemblage, those habitat creation measures detailed above in relation to habitats will provide adequate compensation for losses arising across the Site. such that likely residual effects on the bat assemblage as a result of construction activities are considered negligible. In particular, proposals have sought to maintain connectivity for bats through the retention of key wildlife corridors along the northern and western boundaries of the Site, offset from the development footprint through inclusion of a significant area of open green space across the western extent of the Site.
- 4.5.73 There is, furthermore, the opportunity to enhance the Site for a bat assemblage through those habitat creation measures discussed above in relation to statutory designations, with such habitat features providing additional foraging opportunities compared to baseline conditions, whilst new hedgerow creation, shrub and ecotone planting will serve to strengthen retained wildlife corridors of value for dispersal across the Site.
- 4.5.74 Following implementation of the above mitigation, residual effects are considered negligible while high quality habitat creation and management have the potential to deliver beneficial, permanent and long-term effects at the Local level.

#### **Dormouse**

- 4.5.75 Given the confirmed presence of dormouse onsite, the removal of vegetation suitable for this species will be undertaken in accordance with those measures to be detailed within an approved EPS Development Licence from NRW and supporting method statement. In brief, the following measures will be required during the pre-construction phase of development:
- The installation of dormouse boxes within suitable vegetation to be retained prior to the commencement of dormouse habitat clearance works, to facilitate any future relocation of individuals



during the works where necessary/appropriate, in addition to the enhancement of nesting opportunities across the Site whilst enabling future monitoring of the population thereafter; and

- The adoption of precautionary working methodologies during site clearance using two stage (winter) and/or single stage (summer) clearance methodologies, as follows:
  - Winter clearance methodologies will comprise clearance works to be undertaken over two stages, with first stage clearance confined to above-ground vegetation, undertaken between 01 November and 31 March inclusive (i.e. outside of the dormouse active season and main bird breeding season), and with second stage clearance in relation to all remaining vegetation below-ground, undertaken between 01 and 31 May thereafter (i.e. following dormouse full emergence from hibernation); and/or
  - Single stage summer clearance will also be implemented in relation to small/discrete areas of optimal dormouse habitat or larger areas of sub-optimal dormouse habitat, so as to facilitate commencement of any site enabling/pre-construction activities on-site. Single stage summer clearance works will enable the clearance of both above-ground and below-ground vegetation during the dormouse active season, albeit confined to the set periods of 01-31 May or 01 September-31 October, and thereby avoiding the main dormouse breeding season (considered to be between mid-June and August inclusive) and hibernation period (considered to be between November and March inclusive).

4.5.76 Suitable specimens of native, broadleaved trees and shrubs proposed for loss will also be translocated to suitable receptor sites located across the Site where appropriate, to close up existing gaps and speed up establishment of newly created dormouse habitat.

4.5.77 The Proposed Development has been designed to retain, protect and enhance key dormouse habitat within the Site as far as possible, including semi-natural and plantation woodland habitat, hedgerow H3 and the majority of hedgerow H1. To compensate for the loss of hedgerow H2 amounting to c.180 linear metres, however, combined with removal of a c.15m section of H1, new tree, hedgerow and shrub planting is proposed to be accommodated along the northern and western boundaries of the Site and within areas of proposed open space, with such planting achieving a minimum replacement ratio of 2:1. This will be combined with the infill planting of defunct hedgerows H1 and H3 to be retained. It is recommended for planting across the Site to include a range of tree and shrub species considered to provide valuable food resources during the dormouse active season, including favoured species such as oak (*Quercus* sp.), birch (*Betula* sp.), yew (*Taxus baccata*), hornbeam (*Carpinus betulus*), sweet chestnut (*Castanea sativa*), wayfaring tree (*Viburnum lantana*), holly (*Ilex aquilinum*), guelder rose (*Viburnum opulus*), hawthorn (*Crataegus monogyna*), cherry (*Prunus avium*), hazel (*Corylus avellana*), apple (*Malus sylvestris*), rowan (*Sorbus aucuparia*), spindle (*Euonymus europaeus*), dogwood (*Cornus sanguinea*), ivy (*Hedera helix*) and honeysuckle (*Lonicera periclymenum*).

4.5.78 To further compensate for loss of suitable dormouse habitat, native tree, shrub and hedgerow planting to be implemented across the Site, in addition to retained habitats within the boundaries of the Site, will be subject to ongoing sensitive and appropriate management over the lifetime of the development. Sensitive management will seek to maximise the value of food, dispersal, breeding, and hibernation resources for dormouse through:

- The management of mature tree standards so as to allow younger trees to establish adjacent;
- The selective thinning and coppicing/laying of trees and shrubs;
- The provision of log piles, so as to maximise habitat structure and forage availability for dormouse;
- The implementation of long cutting cycles, with cutting of tree/shrub belts to occur every three years to maintain heights no less than 3m. Cutting will be undertaken on a three year rotation cycle, with a maximum of 30% of the hedgerow resource cut at any one time (thereby enabling a minimum of 30%



left to grow for 7 to 10 years), to ensure that a proportion of cut versus un-cut habitat exists on-site at any one time; and

- The selective thinning of all retained and newly planted native trees and shrubs.

4.5.79 Additionally, to protect the retained woodland hedgerow resource of value to dormouse, the proposed development footprint has been offset from these habitats through the provision of suitable habitat buffers and significant areas of open green space.

4.5.80 Subject to implementation of the above measures and those previously discussed in relation to statutory designations and habitats, it is considered that the development is capable of delivering a net gain in the provision of suitable dormouse habitat across the Site with residual effects of development upon this species considered negligible with proposed habitat creation likely to deliver beneficial, permanent, long-term effects at up to a Local level (considered to be significant in EIA terms).

### **Badger**

4.5.81 In the first instance and to ensure proposed mitigation remains appropriate, an ECMS will specify the requirement for an update badger survey to be undertaken prior to the commencement of site work. In the first instance, impacts to active badger setts including S1-S3 should be avoided through establishment of appropriate working buffers, specific to relevant development activities in accordance with best practice guidance, with such buffers ranging between 10-30m. Where this is not feasible and the Proposed Development footprint will encroach within 30m of active setts such that damage/disturbance could potentially occur, a licence from NRW will be required to permit disturbance of each sett. A detailed mitigation strategy will be informed by the results of further update surveys for badger prior to commencement of development, if consented. A mitigation strategy and NRW Development Licence (where necessary) for active setts where subject to damage/disturbance will, however, be based on the following principles:

- Where loss/damage/disturbance of a main/annexe sett (S1/S2) is unavoidable, the creation of an artificial badger sett will be required in compensation. An artificial badger sett will be constructed as close to the original sett as possible, in association with open green space and adjacent to suitable scrub/tree cover;
- Exclusion of badgers from active setts via installation of one-way badger gates (restricted to the period between July and November inclusive);
- Sett monitoring (minimum 21 days) thereafter, to ensure badgers have not regained access to any setts (to be undertaken between July and November inclusive);
- Excavation of the badger sett (where located within the Site/development footprint) with all tunnels dug back to end; or
- Commencement of excavation/groundworks within 30m of the sett upon exclusion of badger, with removal of badger gates and reopening of all tunnel entrances at each sett following satisfactory completion of potentially disturbing development activities.

4.5.82 In addition to the above and in respect of the presence of badgers more generally, the following measures will apply throughout the construction phase of the development:

- All machinery will be operated by trained personnel only;
- There will be no working at night;
- All trenches/excavations will be covered up overnight and/or a means of escape provided (such as mammal ramps) to avoid wildlife becoming trapped; and
- Any open pipework with an outside diameter of greater 120mm must be covered at the end of each working day to prevent animals entering/becoming trapped.



- 4.5.83 Inherent within the Illustrative Masterplan is the retention of fields F3, F4, the north-western extents of field F1, and southernmost extent of field F2. Such areas will provide opportunities for new habitat creation including new tree, scrub and shrub planting and the enhancement of grassland habitat to be more structurally and botanically diverse, providing alternative foraging opportunities for badger.
- 4.5.84 Subject to implementation of the above measures and those previously discussed in relation to statutory designations and habitats, it is considered that likely residual effects on badger will remain negligible, while high quality habitat creation and management has the potential to deliver beneficial, permanent and long-term effects at the Site level (considered to be not significant in EIA terms).

### **Future Monitoring**

- 4.5.85 Where EPS Development Licences are required to facilitate development, monitoring will be undertaken in accordance with the conditions attached to an approved licence.
- 4.5.86 More generally, it is anticipated that the ECMS and LEMP (to be provided as a condition of outline planning consent) will establish any monitoring actions required during the construction phase of development to ensure protective measures, such as installation of tree protection fencing, are implemented and maintained with sensitive timing of construction activities to ensure no harm/injury to protected and notable species present/potentially present onsite.

### **Accidents and/or Disasters**

- 4.5.87 No additional accidents or disasters resulting from construction activities within the Site, beyond those previously identified above, are considered likely to arise. As such, no further consideration of additional, potential adverse impacts upon IEFs assessed within this chapter is provided in this regard.

## **4.6 Assessment of Operational Effects**

- 4.6.1 Potential significant effects identified which could arise as a result of the operation of the Proposed Development in the absence of mitigation, include the following:
- Effects of light and noise/visual/human disturbance to designated sites, habitats and species;
  - Increased risk of collision and predation to species; and
  - Alteration of surface water run-off/groundwater flow/site drainage.

### **Statutory Designations**

- 4.6.2 The HRA prepared for MCC's Replacement LDP Preferred Strategy considered the impact of a number of vulnerabilities on the statutory designated sites which are pertinent during the operational phase of the Proposed Development, including atmospheric pollution, water quality and recreational pressure.

#### **Wye Valley Woodlands SAC, Wye Valley and Forest of Dean Bat Sites SAC and Pierce, Alcove and Piercefield Woods SSSI**

- 4.6.3 Traffic growth and air quality modelling undertaken to inform an HRA for Monmouthshire's Replacement LDP confirm that no adverse effects upon the integrity of the Wye Valley Woodland SAC alone or in combination will arise in respect of NO<sub>x</sub>, ammonia and nitrogen deposition. Additionally, specific to the development proposals, traffic modelling undertaken by Rappor Consultants Ltd. to inform air quality impacts estimates the potential increase in traffic associated with the Proposed Development, measured as Average Annual Daily Traffic Flow (AADT), will be 526 for Light Goods Vehicles (LGVs) and nil for Heavy Goods Vehicles (HGVs), in respect of the A466 extending north of the development (St Lawrence Road, north of Mounon Road). This is below the threshold change in traffic of 1000 AADT for LGVs and 200 for



HGVs advocated by Highways England in their Design Manual for Roads and Bridges (DMRB) (Highways Agency, 2008) and adopted by Natural England as screening criteria, below which any emissions are widely considered to be imperceptible. As such, likely significant effects on the Wye Valley Woodlands SAC associated with air quality during the operational phase are considered unlikely. Of further consideration and inherent within the Proposed Development is the provision of pedestrian and cycling links throughout the Site, connecting to the wider footpath and cycling network onsite, promoting more sustainable uses of transport with potential benefits to air quality. Overall, impacts upon statutory designated sites associated with changes in air quality are not considered significant.

- 4.6.4 Meanwhile, an increase in residential dwellings could lead to an increase in disturbance through recreational pressure upon woodland habitat features of the Wye Valley Woodlands SAC following an increase in the resident population of the local area. The HRA concluded that visitor pressure within this SAC is limited however, and unlikely to be heavily affected by housing or population growth within Monmouthshire. Nevertheless, inherent within the Illustrative Masterplan and Green Infrastructure/Landscape Strategy is the provision of significant areas of open space across the western extents of the Site, providing suitable alternative opportunities for recreation within the Site. This is in addition to the creation of pedestrian and cycle connections between the Site and wider existing network, including a connection to the National Cycle Route travelling parallel to the northern boundary of the Site, and a PRoW in the north-west corner which allows direct access for residents to Great Barnet's Woodland and farmland north-west of the Site. Subsequently, significant effects associated with increased recreational pressure upon statutory designated sites are considered negligible.
- 4.6.5 Indirect effects in the form of light spill and noise upon populations of lesser and greater horseshoe bats utilising the Site for foraging/commuting may continue during the operational phase of the Proposed Development. Such effects are likely to be limited given the offsetting of built development from important wildlife corridors by areas of green open space. Nevertheless and where arising, negative effects upon qualifying bat species associated with the Wye Valley Woodlands SAC and Wye Valley and Forest of Dean Bat Sites SAC, in the absence of mitigation, are considered permanent, irreversible and long-term at the Site level.

#### **River Wye SAC/SSSI and Severn Estuary Ramsar Site/SAC/SPA, Pennsylvania Fields, Sedbury SSSI and Beachley Grassland LWS**

- 4.6.6 At the Site level, the River Wye SAC/SSSI, Pennsylvania Fields, Sedbury SSSI and Beachley Grassland LWS are hydrologically connected to the Site via land drains such that there is the potential for negative changes in water quality during the operational phase of development following an increase in surface water runoff. However, adverse impacts associated with site drainage, including surface water run-off and ground water contamination are considered unlikely, subject to implementation of a sensitive drainage strategy (in accordance with relevant planning policy), to be delivered as part of the inherent design. Such measures include the sustainable drainage to collect, manage and remediate surface water runoff prior to its discharge, which will be integrated within areas of green open space and the built development. In light of inherent mitigation, impacts associated with pollution and contaminated surface water runoff upon statutory designations during operation are considered negligible.
- 4.6.7 Of further consideration is the potential for changes in the water quality within the River Wye SAC specifically, arising from an increase in the volume of sewage effluent being discharged into the river from the receiving Wastewater Treatment Works (WwTWs) and thus increase in phosphorus (P) loading following occupation of proposed residential development. The section of the River Wye in which the Site is located and discharges into, however, is outside of the catchment considered sensitive to phosphorus such that significant effects are considered unlikely.
- 4.6.8 Additionally, given the A48 crosses the River Wye in Chepstow, there is the potential for a deterioration in local air quality and subsequent effects upon sensitive habitats associated with the River Wye SAC during the operational phases of development following an increase in traffic levels generated by new



development and thus harmful emissions (nitrous oxides (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>) to the atmosphere. Such compounds can impact water quality through a reduction in oxygen levels in waterbodies, leading to eutrophication with subsequent changes in aquatic communities. Freshwater environments are, however, typically phosphorus-limited such that increased loading of nitrogen-based compounds to this aquatic environment is unlikely to have an effect on freshwater communities.

- 4.6.9 There also remains the potential for indirect impacts upon qualifying features of the River Wye SAC and Severn Estuary Ramsar Site/SAC/SPA following an increase in the resident population of the local area, with a subsequent increase in recreational pressure upon these designations. It is, however, noted that MCC's HRA suggests that adverse effects upon the integrity of the Severn Estuary in particular, can be avoided through implementation of a Strategic Access Management and Monitoring Strategy (SAMMS) to be embedded within local planning policy. Additionally, more specialised recreational activities along the River Wye such as canoeing and fishing are tightly controlled and, overall, relatively low risk, with only a very small portion of new residents expected to undertake such activities.

### Non-statutory Designations and Habitats

- 4.6.10 As outlined above, adverse impacts associated with atmospheric pollution effects are unlikely with predicted changes in traffic generated by the new development calculated to be below the threshold change of 1000 AADT for LGVs and 200 for HGVs whilst the provision of pedestrian and cycling links throughout the Site, will contribute to the use of more sustainable transport modes.
- 4.6.11 An increase in residential dwellings could lead to an increase in disturbance through recreational pressure on Part of Bishop's Barnets Wood SINC; Crossways Green 2 SINC; Crossway Green SINC; Piercefield Avenue SINC; Piercefield Park SINC; and Piercefield Wood Wildlife Trust Reserve. As discussed in relation to statutory designations, however, such effects are considered negligible given the provision of significant areas of alternative open green space within the Illustrative Masterplan combined with proposals for new pedestrian and cycling links within the Site, connecting to the wider network.
- 4.6.12 Indirect impacts associated with elevated noise and lighting upon restored ancient woodland adjacent to the Site is, however, anticipated with subsequent negative effects on protected/notable species supported therein. Such effects, in the absence of mitigation, are considered negative, indirect, permanent, reversible, long-term and significant at the Site level.
- 4.6.13 It is considered that none of the other non-statutory designated sites scoped into an EIA would potentially be directly or indirectly impacted by the development proposals due to their spatial separation from the Site, interest features, lack of any habitat connections and/or inaccessibility to the public, combined with inherent mitigation including delivery of a sensitive drainage strategy, active travel connections and provision of alternative open green space for recreation.

### Breeding Birds

- 4.6.14 Retained habitats supporting breeding and foraging birds are potentially at risk of disturbance during the operational phase of the development, in the form of light spill and noise. Nesting birds' sensitive to such disturbance could abandon nests and breeding territories and become displaced from other populations. In the absence of mitigation, negative effects upon such species are considered indirect, permanent, irreversible, long-term and of Local significance. However, such impacts are considered to be reduced given the retention and protection of ecologically valuable habitat including woodland, hedgerow H3 and the majority of hedgerow H1 whilst new planting will further strengthen retained nesting habitat.
- 4.6.15 Increased predation of wildlife may also arise following occupation as a result of cat ownership across the development. The unmitigated impact of increased predation upon birds can be characterised as a negative effect which is probable to result, with such effects expected to be direct, permanent, irreversible





and long-term. Given the proposed offsetting of retained habitat features from built development by significant areas of open green space, however, such effects are not considered significant.

### **Roosting/Foraging/Commuting Bats**

- 4.6.16 In relation to bats, an increase in disturbance arising from increased human presence, vehicular noise, and light originating from residential dwellings, may affect the behaviour of species utilising those habitats on-site. The use of artificial lighting across the Site could also result in detrimental effects upon bat species due to light spill upon adjacent habitats in use as foraging and commuting corridors. Such effects could result in the abandonment of roosting sites and the displacement of dispersal routes across the Proposed Development, and may also result in the isolation of, and reduced interactions between, populations necessary to maintain genetic diversity. The continued ecological functionality of habitat corridors on-site may therefore be reduced. In the absence of mitigation, negative, indirect, permanent, reversible and long-term effects upon the bat assemblage have the potential to occur at a Local level.
- 4.6.17 Increased predation upon bats, particularly at roost sites, may also arise following occupation, as a result of cat ownership across the Proposed Development. The unmitigated impact of increased predation upon species can be characterised as a negative effect, with such effects expected to be direct, permanent and irreversible occurring over the long-term. Given the proposed offsetting of retained habitat features from built development by significant areas of open green space, however, such effects are not considered significant.

### **Dormouse**

- 4.6.18 Increases in visual/noise/human disturbance could result in negative effects upon dormouse, although such impacts are considerably less given the retention of ecologically valuable woodland habitat and provision of new planting and habitat buffers adjacent which further offset the development footprint away from dormouse habitat. In the absence of mitigation, negative effects upon dormouse are considered permanent, irreversible, and of Site Level significance to dormouse. The use of artificial lighting across the Site could also result in possible detrimental effects to dormouse, although such impacts remain relatively unstudied at present with respect to this species.
- 4.6.19 Similarly in relation to breeding birds and bats increased predation upon bats, particularly at roost sites, may also arise following occupation, as a result of cat ownership across the Proposed Development with such effects expected to be direct, permanent and irreversible occurring over the long-term and not considered significant.

### **Badger**

- 4.6.20 In the absence of mitigation, the effects of the completed Development on badger may include an increased risk of collision with vehicles on new roads and disturbance of retained active setts from increased human activity. Whilst operation will result in adverse effects to badger occupying the Site and their setts, this species remains common and widespread with the county and the United Kingdom, such that effects upon the population and wider conservation status are negligible.

### **Further Mitigation**

- 4.6.21 Detailed ecological management prescriptions for the long-term management of newly created and enhanced habitats in respect of protected species will be provided within a LEMP, which will set out in detail the following additional ecological measures to mitigate for proposed habitat loss across the Site and further mitigate for potential operational impacts:





- The ecological management prescriptions for defined management compartments to be retained and /or created including: hedgerows, trees, grassland habitats, bat/bird/dormouse nest box features and hibernacula/refugia with respect to their establishment and long-term management;
- The monitoring of habitat features e.g. dormouse boxes, where required in accordance with planning conditions and/or conditions of an European Protected Species; and
- The management and maintenance of formal and informal footpaths, any signage, dog/litter bins, interpretation boards and other such items.

### **Statutory/Non-statutory Designated Sites and Habitats**

- 4.6.22 In respect of statutory designated sites, inherent mitigation comprising implementation of a sensitive drainage strategy will ensure that no significant adverse effects will arise upon water quality and thus the favourable conservation status of River Wye SAC and associated SSSI. Such features can be planted with native marginal and aquatic species and species-rich grassland to maintain suitable habitat provision for protected/notable species within the Site and deliver net benefits to biodiversity as well as visual amenity.
- 4.6.23 As previously discussed in relation to air quality effects, inherent within the Illustrative Masterplan is the provision and enhancement of pedestrian and cycling paths linking to the wider network offsite including PROW to the north west and south east of the Site as well as the National Cycle Network which runs along the northern and eastern boundaries of the Site, promoting alternative sustainable transport and in so doing contributing to a reduction in traffic emissions more generally across the County.
- 4.6.24 In addition to the above, significant negative effects upon statutory designated sites arising from increased levels of recreational usage following occupation of the Proposed Development will be mitigated in a number of ways, including:
- The provision of significant areas of formal and informal open space throughout the Site;
  - Integration of habitat and wildlife features within areas of public open space, incorporating species-rich grassland, tree and shrub planting;
  - Formal landscaping and tree planting across the built development footprint to soften the edges of development; and
  - The appropriate maintenance and long-term management of paths running through the Site, to include the provision of litter and dog bins and gates where appropriate.
- 4.6.25 A sensitive lighting strategy for the Site will be designed in accordance with Guidance Note 08 (GN08) Bats and Artificial Lighting (Institute of Lighting Professionals, 2023) and will seek to minimise the spillage of artificial lighting upon retained and newly roosting, foraging, and commuting/dispersal habitats for bats, breeding birds and other protected notable species present/potentially present around the peripheries of the Site and across informal open green space. This is particularly key along the northern and western woodland boundaries of the Site where light spill should not exceed 0.5 lux. Overall, the following design measures are recommended to minimise lighting impacts along ecological corridors:
- The reduction in height of lighting columns where adjacent to sensitive habitats to allow for low-level lighting or, where appropriate, the use of tall columns designed to allow light to be directed downwards more acutely and reduce horizontal spill;
  - The use of LED light sources with a warm white colour temperature (2700k);
  - The use of a lighting control system to ensure that lighting is only used when it is needed and limits light exposure to ecologically sensitive areas through light dimming controls;
  - The use of glare control accessories including back shields or hoods to minimise backward light spill; and



- The programming of timed lighting to ensure adequate dark periods between dusk and dawn around the peripheries of the Site and across informal open green space.

- 4.6.26 Such a strategy would ensure that permanent lighting is reduced as far as possible along such key wildlife corridors to be retained, strengthened and created. Where lighting is required along road/pedestrian routes adjacent, lighting columns should be directed away from habitat edges to minimise disturbance and light spill. Such measures can be secured via planning condition attached to any future consent.
- 4.6.27 The proposed measures described above would ensure ecological effects are sufficiently mitigated for, whilst the sensitive management of retained and newly created habitat features will further ensure an overall enhancement of biodiversity across habitats of ecological value within the Site over the long-term. Following implementation of the above mitigation, residual effects are considered negligible.

### Breeding Birds

- 4.6.28 In the absence of mitigation, the operational phase of the Proposed Development has the potential for permanent and irreversible effects associated with an increase in predation by cats following occupation. The detailed habitat creation, to be delivered within a Soft Landscape Scheme as a condition of outline planning consent, will be designed to maintain/increase suitable dense vegetation cover/refuge for the breeding bird assemblage, including the use of thorny species, to provide protection from predators whilst also providing a foraging resource. Following implementation of mitigation, residual effects are considered negligible.
- 4.6.29 To further enhance the Site for the bird assemblage the provision of durable bird boxes and bird nesting chambers, to include a range of designs to suit different species, will be erected on retained mature trees and buildings.
- 4.6.30 It is further recommended that a planting scheme for the Site include fruit-bearing species that will provide a foraging resource throughout the year.
- 4.6.31 This will be in addition to the sensitive management of such habitats and features to increase their resilience and mitigate long-term disturbance effects and deliver a beneficial residual effect at a Site level. Such measures will be implemented in accordance with the LEMP prepared for the Site. Accordingly, and following implementation of the above mitigation, effects upon a bird assemblage are considered negligible.

### Roosting/Commuting/Foraging Bats

- 4.6.32 Subject to the implementation of mitigation previously discussed above, including the adoption of a sensitive lighting strategy and habitat management, effects arising from disturbance and increased pet predation are considered negligible.
- 4.6.33 Bat roost features (such as bat tubes/bricks and/or raised ridge/roof tiles), will also be incorporated into the exterior of new buildings where possible, to enhance roosting provision within the Site. This will also be in addition to the installation of bat boxes upon suitable trees onsite where identified for retention.
- 4.6.34 Additional planting of native species attractive to invertebrates that will provide prey for bats will be incorporated into the planting scheme. This will include night-scented plants such as honeysuckle, as well as a mixture of flowering plants which will flower throughout the year.

### Dormouse

- 4.6.35 Subject to the implementation of mitigation previously discussed above and in line with derogation licensing requirements, effects arising from disturbance and increased pet predation are considered negligible.



- 4.6.36 Dormouse nest boxes will also be installed within suitable retained vegetation within the Site to further enhance nesting provision within the Site, together with the provision of sufficient mitigation planting, subject to monitoring over the long term in accordance with a future Development Licence granted by NRW.

### **Badger**

- 4.6.37 Those habitat management measures discussed above will further serve to mitigate disturbance effects through the strengthening of woodland boundaries that will provide movement corridors across the Site, whilst strategic planting around the retained setts will serve to deter unauthorised public access. [REDACTED]

- 4.6.38 In so doing, residual effects on badger during operation are considered negligible.

### **Future Monitoring**

- 4.6.39 Where EPS Mitigation Licences are required to facilitate development, monitoring will be undertaken in accordance with the conditions attached to an approved licence.
- 4.6.40 More generally, it is anticipated that the LEMP (to be provided as a condition of outline planning consent) will require monitoring and review of all operations set out within the LEMP at 5-year intervals post-development, so as to take account of any changes to the Site or other influencing factors which may become evident as the landscape and ecological features become established and approach maturity. Such monitoring will be used to inform remedial actions where necessary.

### **Accidents/Disasters**

- 4.6.41 The potential for additional accidents or disasters to occur following occupation of the Site is considered highly unlikely such that consideration of additional, potential adverse impacts upon IEFs assessed within this chapter is not considered warranted/relevant to this assessment.

### **Potential Changes to the Assessment as a Result of Climate Change**

- 4.6.42 The impact of climate change on the ecology resource is assessed through consideration of a potential future baseline scenario and considers how potential climate change may alter the ecology features discussed within this Chapter. Whilst it is unlikely that completely new direct impacts would arise as a result of climate change based on the current conditions, the geographic spread or scale of potential impacts might be changed when considered against the future baseline conditions.
- 4.6.43 The changes to temperature and precipitation predicted would be likely, in time, to change the landscape around us, in a number of ways. However, it is unlikely that the subtle changes would lead to wholesale change to the future ecology baseline within the lifetime of the Development. Changes could include certain floral species becoming more dominant/prevalent, changes to phenology or species extending their home ranges. However, given that the valued habitats and species are widespread and the Site is not near the edge of any of their ranges, the projected change in temperatures is not anticipated to result in any significant impacts on the designated site, habitat or species IEFs.
- 4.6.44 Changes in precipitation and daytime temperatures may also have impacts on the hydrological regime of the Site with increased risk of flood events and/or drought. At the site level, however, the implementation of a sustainable drainage strategy, incorporating attenuation basins which also provides suitable habitat opportunities for wildlife, will provide sufficient resilience to any likely effects of future climate change.
- 4.6.45 It is considered that the provision of green infrastructure within the proposals, which will be managed to promote biodiversity, will provide sufficient resilience to any likely effects of future climate change. The



provision of suitable habitat for these species within the Site may provide a future stepping stone for the dispersal of these species across former agricultural land of limited ecological value and, thereby increase the resilience of local populations.

- 4.6.46 Furthermore, future monitoring of the new and retained habitats within the Site recommended to be detailed within the LEMP for the site, as described above in the mitigation section, will allow an opportunity for management prescriptions to be reviewed and amended to reflect any impacts as a result of climate change. This will further safeguard the habitat and species interests at the Site over the long term.

## 4.7 Assessment of Cumulative Effects

- 4.7.1 Appropriate consideration has been given to the sites and projects in the surrounding area which could potentially give rise to cumulative effects in combination with the Proposed Scheme and assessment made of the potential nature and significance of any cumulative effects arising in terms of Ecology.
- 4.7.2 Having undertaken that process, it is concluded that there would be no cumulative effects in terms of those receptors assessed as being potentially affected by the Proposed Scheme and the sites in the Proposed Scheme's surroundings identified for cumulative assessment. This conclusion is applicable to both the 'construction' phase and 'operational' phase of the Proposed Scheme and so as a result no additional mitigation measures are either necessary or proposed.

## 4.8 Inter-relationships

- 4.8.1 There are considered to be potential inter-relationships between the assessment of effects on Ecology in this chapter, and those identified in relation to Landscape and Visual (Chapter 5) and Cultural Heritage (Chapter 6).
- 4.8.2 These inter-relationships primarily relate to the design, implementation, and long-term management of public open space around the perimeter of the development, particularly across the western extent of the Site and along the southern boundary where adjacent to the Grade II listed building St. Lawrence House.
- 4.8.3 The detailed design, delivery, and ongoing maintenance of green open space and associated landscaping are expected to be delivered through the LEMP to be secured via a planning condition of any future outline consent.

## 4.9 Summary of Effects

- 4.9.1 Table 4.6 summarises the likely significant effects identified within this chapter in absence of mitigation.

## 4.10 Conclusion

- 4.10.1 This chapter has assessed the likely significant effects arising from the Proposed Scheme upon Site Ecology, in the absence of mitigation, considering both the construction and operational phases. The assessment details the potential ecological effects the development proposals may have on the Site and its surroundings, includes a review of the current baseline conditions found within the area, and identifies measures to avoid, minimise, mitigate and/or compensate where appropriate for any significant adverse effects that may otherwise arise as part of the proposals.
- 4.10.2 In consideration of IEFs associated with the Site, together with embedded primary and tertiary mitigation measures, it is concluded that the proposals will conform to the respective legislative protection afforded to these IEFs and with respect to national and local planning policy requirements. Overall and subject to implementation of those avoidance, minimisation, mitigation and/or compensation measures above, residual effects are considered negligible.



## 4.11 References

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- 4.11.4 The Wildlife and Countryside Act 1981 (as amended) Chapter 69.
- 4.11.5 Countryside and Rights of Way (CROW) Act 2000 Chapter 37.
- 4.11.6 Natural Environment and Rural Communities (NERC) Act, 2006 Chapter 16.
- 4.11.7 Animal Welfare Act 2006 Chapter 45.
- 4.11.8 The Wild Mammals (Protection) Act 1996 Chapter 3.
- 4.11.9 Protection of Badgers Act, 1992 Chapter 51.
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  - 4.11.30 The HRA prepared for MCC’s Replacement LDP Preferred Strategy (albeit not yet adopted) in September 2024 (AECOM, 2024).
  - 4.11.31 Air Pollution Information System (APIS): <https://www.apis.ac.uk>.



**Table 4.6: Summary of Likely Environmental Effects on Ecology in Absence of Mitigation, Identified Mitigation Measures and the Likely Residual Effects**

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
<b>Construction</b>				
Wye Valley Woodlands SAC and Pierce, Alcove and Piercefield Woods SSSI	Habitat degradation following increase in harmful atmospheric emissions from construction traffic.	Negligible. <b>Not Significant (Local)</b> .	N/A.	Negligible
Wye Valley Woodlands and Wye Valley and Forest of Dean Bat Sites SAC	Loss and fragmentation of functionally linked habitat.	Direct, permanent, long-term, irreversible, negative. Significant (Local).	Retention and enhancement of habitats including: broadleaved semi-natural and plantation woodland; hedgerow H3 and majority of H1; scrub vegetation (G14); fields F3, F4, north-western extent of F1, and southernmost extent of field F2. Provision and management of new habitats in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent.	Negligible
	Degradation and damage of functionally linked habitat during construction and landscaping works leading to physical impacts to tree roots.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Disturbance impacts upon functionally linked habitat due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site)</b> .	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
River Wye SAC, River Wye SSSI/River Wye (Lower Wye) SSSI, Pennsylvania Fields, Sedbury SSSI and Beachley Grassland LWS	Surface/ground water run-off and pollution.	Indirect, temporary, short-medium term, reversible in the short-term. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented during construction including	Negligible



Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			adoption of pollution prevention guidelines.	
River Wye SSSI/River Wye (Lower Wye) SSSI	Surface/ground water run-off and pollution.	Indirect, temporary, short-medium term, reversible in the short-term. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented during construction including adoption of pollution prevention guidelines.	Negligible
River Wye SAC and River Wye SSSI/River Wye (Lower Wye) SSSI	Habitat degradation following increase in harmful atmospheric emissions from construction traffic.	Negligible. <b>Not Significant (Local)</b> .	N/A	Negligible
Restored Ancient Woodland	Habitat degradation and damage during construction and landscaping works leading to physical impacts to tree roots.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Habitat degradation following increase in harmful atmospheric emissions.	Indirect, permanent, long-term, negative. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented during construction including adoption of pollution control measures.	Negligible
Ancient Semi-natural Woodland, Piercefield Avenue SINC, Crossways Green 2 SINC and Crossways Green SINC	Habitat degradation following increase in harmful atmospheric emissions.	Negligible. <b>Not Significant (Local)</b> .	N/A	Negligible
Restored Ancient Woodland	Disturbance impacts due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site)</b> .	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
Native Hedgerows	Habitat loss and fragmentation.	Direct, permanent, long-term, irreversible, negative. <b>Significant (Local)</b> .	Habitat creation combined with enhancement of retained habitats and sensitive long-term management in accordance with a Detailed Soft Landscaping Scheme	Beneficial, permanent, long-term at Local level <b>(Significant)</b> .

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			and LEMP provided as a condition of outline planning consent.	
Native Hedgerows and Semi-natural Broadleaved Woodland	Habitat degradation and damage during construction and landscaping works leading to physical impacts to tree roots.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Disturbance impacts due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site)</b> .	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
Breeding Birds	Direct harm/injury.	Negligible (subject to legal compliance. <b>Not significant (Site)</b> ).	ECMS and CEMP with protective measures and sensitive working methodologies.	Negligible.
	Loss of habitats used for breeding, foraging and shelter.	Direct, permanent, long-term, irreversible, negative. <b>Significant (Local)</b> .	Habitat creation combined with enhancement of retained habitats and sensitive long-term management in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent.	Beneficial, permanent, long-term at Site level <b>(Not significant)</b> .
	Physical degradation and damage to retained habitats used for breeding, foraging and shelter.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local)</b> .	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Disturbance impacts due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site)</b> .	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
Bats	Loss of habitats used for foraging and dispersal.	Direct, permanent, long-term, irreversible, negative. <b>Significant (Local)</b> .	Habitat creation combined with enhancement of retained habitats and sensitive long-term	Beneficial, permanent, long-term at Local level <b>(Significant)</b> .

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			management in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent.	
	Physical degradation / damage to retained habitats used for roosting, foraging and dispersal.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local).</b>	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Disturbance impacts due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site).</b>	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
Dormouse	Loss of habitats used for breeding, foraging and shelter.	Direct, permanent, long-term, irreversible, negative. <b>Significant (Local).</b>	Retention and enhancement of habitats suitable for dormouse including: broadleaved semi-natural and plantation woodland; hedgerow H3 and majority of H1; and scrub vegetation (G14). Provision and management of new hedgerow/shrub/tree habitats in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent and EPS Development Licence.	Beneficial, permanent, long-term at Local level (Significant).
	Physical degradation/ damage to retained habitats used for breeding, foraging and shelter.	Indirect, permanent, short-medium term, irreversible, negative. <b>Significant (Local).</b>	ECMS and CEMP with protective measures to be implemented including installation of protective fencing around EPZs.	Negligible
	Direct harm/injury.	Direct, permanent, long-term, irreversible, negative. <b>Significant (Local).</b>	ECMS and CEMP with protective measures and sensitive working methodologies. Implementation	Negligible

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			of development in accordance with an EPS Development Licence.	
	Disturbance impacts due to elevated noise and lighting.	Indirect, temporary, short-medium term, reversible, negative. <b>Significant (Site).</b>	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
Badger	Loss / damage / disturbance to active setts.	Negligible. <b>Not significant (Site).</b>	Closure of any active setts within 30m of the construction footprint in accordance with a Development licence from NRW, combined with creation of an artificial sett where loss of a main/annexe sett is likely. Sensitive construction measures set out within the ECMS to ensure no harm to badger.	Negligible
	Loss of habitats used for foraging and dispersal.	Negligible. <b>Not significant (Site).</b>	Habitat creation combined with enhancement of retained habitats and sensitive long-term management in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent.	Negligible
	Disturbance impacts due to elevated noise and lighting.	Negligible. <b>Not significant (Site).</b>	ECMS and CEMP with protective measures to be implemented including avoidance of night lighting and/or implementation of a sensitive lighting strategy.	Negligible
<b>Operation</b>				

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
Wye Valley Woodlands SAC and Pierce, Alcove and Piercefield Woods SSSI	Habitat degradation following increase in harmful atmospheric emissions from increased traffic during operation.	Negligible. <b>Not Significant (Local)</b> .	N/A	Negligible
	Habitat degradation following increase in recreational pressure.	Negligible. <b>Not Significant (Local)</b> .	Delivery and management of alternative recreational spaces within the Site in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent.	Negligible
Wye Valley Woodlands and Wye Valley and Forest of Dean Bat Sites SAC	Disturbance impacts upon functionally linked habitat due to elevated noise and lighting.	Indirect, permanent, long-term, reversible, negative. <b>Significant (Site)</b> .	Implementation of an operational sensitive lighting strategy delivered as a condition of outline planning consent.	Negligible
River Wye SAC, River Wye SSSI/River Wye (Lower Wye) SSSI, Pennsylvania Fields, Sedbury SSSI and Beachley Grasslands LWS	Surface/ground water run-off and pollution.	Negligible. <b>Not Significant (Local)</b> .	Protection through sensitive drainage strategy in accordance with local and national policy.	Negligible
	Increase in sewage effluent.	Negligible. <b>Not Significant (Local)</b> .	Ensuring efficient water use design. WwTW has sufficient headroom with River Wye downstream of the Site not constrained by phosphate levels.	Negligible
River Wye SAC and River Wye SSSI/River Wye (Lower Wye) SSSI	Habitat degradation following increase in harmful atmospheric emissions from operational traffic.	Negligible. <b>Not significant (Local)</b> .	N/A	Negligible
Restored Ancient Woodland/Ancient Semi-natural Woodl, Piercefield Avenue SINC, Crossways Green 2 SINC and Crossways Green SINC	Habitat degradation following increase in harmful atmospheric emissions from operational traffic.	Negligible. <b>Not significant (Local)</b> .	N/A	Negligible
Restored Ancient Woodland	Disturbance impacts due to elevated noise and lighting.	Indirect, permanent, long-term, irreversible, negative. <b>Significant (Site)</b> .	Implementation of an operational sensitive lighting strategy	Negligible

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			delivered as a condition of outline planning consent.	
Native Hedgerows and Semi-natural Broadleaved Woodland	Disturbance impacts due to elevated noise and lighting.	Indirect, permanent, long-term, irreversible, negative. <b>Significant (Site)</b> .	Implementation of an operational sensitive lighting strategy delivered as a condition of outline planning consent.	Negligible
Breeding Birds, Bats, Dormouse	Disturbance impacts due to elevated noise and lighting.	Indirect, permanent, long-term, irreversible, negative. <b>Significant (Site)</b> .	Implementation of an operational sensitive lighting strategy delivered as a condition of outline planning consent.	Negligible
	Predation by pets.	Direct, permanent, long-term, irreversible. Negative. <b>Not significant (Site)</b> .	Habitat creation combined with enhancement of retained habitats and sensitive long-term management in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent providing refuge and foraging opportunities outwith the development footprint.	Negligible
Badger	Disturbance impacts due to elevated noise and lighting.	Negligible (owing to conservation status). <b>Not significant (Site)</b> .	Implementation of an operational sensitive lighting strategy delivered as a condition of outline planning consent.	Negligible
	Increased risk of collision.	Negligible (owing to conservation status). <b>Not significant (Site)</b> .	Habitat creation combined with enhancement of retained habitats and sensitive long-term management in accordance with a Detailed Soft Landscaping Scheme and LEMP provided as a condition of outline planning consent providing refuge and foraging	Negligible

Receptor	Description of impact	Impact and Significance	Mitigation	Residual Effect
			opportunities outwith the development footprint.	



## 5 LANDSCAPE AND VISUAL

### 5.1 Introduction

- 5.1.1 This Chapter reports the outcome of the assessment of likely significant environmental effects arising from the Proposed Scheme in relation to Landscape and Visual matters.
- 5.1.2 The Chapter describes the technical consultation that has been undertaken during the Environmental Impact Assessment (EIA), the scope of the assessment and assessment methodology, and a summary of the baseline information that has informed the assessment.
- 5.1.3 The assessment reports on the likely significant environmental effects, the further mitigation measures required to prevent, reduce or offset any significant adverse effects, or further enhance beneficial effects. The conclusions are provided both in terms of the residual effects and whether these are considered significant. The assessment of effects takes into consideration both primary and tertiary mitigation and is informed by the EIA screening and iterative scoping (**Appendix 2**) process where applicable.
- 5.1.4 This Chapter, its associated Figures 5.1 – 5.5 and Technical Appendices 5.1 and 5.2 (as listed below), is intended to be read as part of the wider Environmental Statement (ES) with particular reference to the introductory Chapters of this ES:
- **Technical Appendix 5.1:** Landscape and Visual Baseline (LVB); and
  - **Technical Appendix 5.2:** Landscape and Visual Effects.
- 5.1.5 The following drawings have been prepared to further inform the landscape and visual assessment:
- **Figure 5.1:** Site Location and Site Boundaries;
  - **Figure 5.2:** Site Character and Context;
  - **Figure 5.3:** Landscape Designations and Other Relevant Considerations;
  - **Figure 5.4:** Other Environmental Considerations; and
  - **Figure 5.5:** Findings of EDP's Visual Appraisal.
- 5.1.6 Landscape and visual effects are independent but related issues. Landscape effects relate to changes to the landscape fabric and other dimensions, including visual and perceptual dimensions, contributing to the landscape character; visual effects relate to the appearance of such changes within views and the resulting effect on visual amenity.
- 5.1.7 The purpose of the Landscape and Visual Impact Assessment (LVIA) is to review landscape character and visual amenity, and to assess the resulting landscape and visual effects of the Proposed Scheme.



## 5.2 Assessment Methodology

- 5.2.1 EDP's methodology for undertaking the LVIA follows the guidelines set out in the third edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The methodology is contained within this ES Chapter and as **Appendix EDP 1** at **Technical Appendix 5.1**.

### Planning Policy Context

- 5.2.2 The following legislation and policy have informed the assessment of effects within this Chapter, and are detailed further in **Appendix 5.1**:

- Planning Policy Wales – Edition 12 (February 2024)<sup>1</sup>;
- Monmouthshire County Council Adopted Local Development Plan 2011-2021 (February 2014)<sup>2</sup>;
- Policy S1 - The Spatial Distribution of New Housing Provision: The main focus for new housing development is within or adjoining the main towns of Abergavenny, Chepstow and Monmouth;
- Policy S13 - Landscape, Green Infrastructure and the Natural Environment; and
- Policy LC6 – Green Wedges.
- Monmouthshire County Council Replacement Local Development Plan 2018-2033;
- Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery;
- Policy GW1 - Green Wedge Designations;
- Policy GI1 - Green Infrastructure;
- Policy GI2 - Trees, Woodland and Hedgerows;
- Policy LC1 - Landscape Character; and
- Policy LC4 - Wye Valley National Landscape.

### Relevant Guidance

- 5.2.3 The following guidance has informed the assessment of effects within this Chapter and is detailed further in **Technical Appendix 5.1**:
- 5.2.4 Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> Edition (GLVIA3);
- 5.2.5 Monmouthshire Landscape Sensitivity Update Study (October 2020);

<sup>1</sup> <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf> Accessed 28.05.2025.

<sup>2</sup> <https://www.monmouthshire.gov.uk/app/uploads/2017/05/Adopted-Local-Development-Plan-with-PDF-tags.pdf> Accessed 25.05.2025.

<sup>3</sup> <https://www.monmouthshire.gov.uk/app/uploads/2024/10/Monmouthshire-Deposit-RLDP.pdf> - Accessed 28.05.2025.



## Study Area

- 5.2.6 In order to establish the baseline conditions and potential limit of significant effects, a broad study area was adopted to enable the geographical scope of the assessment to be defined, and to provide the wider geographical context of the study. The search focused on the local planning policy context, identifying national and local landscape and other associated designations (e.g. national landscapes (NLs), historic parks and gardens), and providing a general geographical understanding of the Site and its broader context (e.g. in relation to landform, transport routes and the distribution and nature of settlement).
- 5.2.7 Following initial analysis and subsequent field work, and having an appreciation of the development proposed, a refinement of the study area has been undertaken which focuses on those areas and features that are likely to be affected by the proposals within 1km of the Site, hereon referred to as the detailed study area, although occasional reference may be made to features beyond this area where appropriate. This detailed study area is shown on **Figure 5.1 of Technical Appendix 5.1**.

## Baseline Methodology

### Background Studies to Inform the ES / Establishing the Baseline

- 5.2.8 Table 5.1 summarises all studies and surveys undertaken to inform the assessment presented within this Chapter. Where these background studies have not been appended to the ES, sufficient information is summarised within this Chapter to inform the assessment of likely significant effects.

**Table 5.1: Background Studies and Surveys**

Study/Survey/ Analysis/Evaluation	Overview	Date of Completion
Landscape and Visual Site Visit	Site walkover and photoviewpoint assessments.	Site visits were completed in February 2024.
Landscape and Visual Baseline (LVB) (Appendix 5.1)	The purpose of the LVB is to identify the baseline conditions of the Site and surrounding area and to determine those landscape and visual characteristics that might inform the design of the development proposals, including recommendations for mitigation. It provides an assessment of the landscape and visual effects predicted to arise from development on the Site with reference to the baseline analysis.	February 2024.
Arboricultural Impact Assessment (AIA) (Report Ref. edp6238_r013)	The purpose of the AIA is to set out the nature and extent of tree losses and it provides mitigation and protection measures to ensure the long-term retention of retained trees. Tree protection measures are proposed to form part of the Construction Environmental Management Plan (CEMP) and reference is made in the Primary and Tertiary Mitigation to prioritise the retention and enhancement of the existing landscape fabric (trees and hedgerows).	November 2024.



Study/Survey/ Analysis/Evaluation	Overview	Date of Completion
Ecological Baseline Report (Report Ref. edp6238_r017)	The Ecological Baseline (Technical Appendix 4.1) report describes the current ecological interest within and around the Site, having been identified through standard desk- and field-based investigations.	May 2025

5.2.9 The first stage of the assessment was to establish the baseline conditions of the Site and surrounding area, which included identifying the landscape character and key features of the landscape and whether any landscape designations affect the Site. Sources examined for the desktop study included:

- Local planning policy;
- Landscape and heritage designations;
- Natural Resources Wales (NRW)'s National Character Areas;
- LANDMAP Character Areas;
- PRowS;
- Local Ordnance Survey (OS) maps; and
- Aerial photographs.

5.2.10 Site appraisals have already been undertaken, the purpose of which was to:

- Confirm the extent of the study areas for the landscape and visual assessments respectively (as set out under 'Defining the Study Area').

## Consultation

5.2.11 A summary of all consultation with stakeholders or consultees (such as local planning authority) needs to be provided in the table below. Refer to any consultation agreements on methodology, scope of survey work, including where deviations from standard methods have been agreed.



**Table 5.2: Consultation Responses Relevant to this Chapter**

Date	Consultee and Issues Raised	How/Where Addressed
8 <sup>th</sup> February 2024	Agreement of Photoviewpoint Locations with Mr Andrew Neville of Monmouthshire County Council	Feedback/agreement was sought following the issue of EDP's Photoviewpoint location plan alongside grid co-ordinates. Agreement was given by Mr Neville regarding the locations, with some additional receptor locations suggested and recorded.

### Assessment Criteria and Assignment of Significance

- 5.2.12 Provided within this section is an abridged methodology for the landscape and visual assessment. An unabridged version and glossary can be found at **Appendix EDP 1 of Technical Appendix 5.1**.
- 5.2.13 The assessment considers landscape and visual matters as separate but linked issues. It takes into account:
- Landscape effects relating to physical changes to the landscape resource, such as landform, footpaths, trees, hedgerows and other types of vegetation;
  - Landscape effects relating to potential changes to landscape or townscape character. Character is about how different factors combine or interact to give an area its distinct sense of place; and
  - Visual effects relating to changes in the composition of people's views or their visual amenity.
- 5.2.14 A three-stage assessment process has been adopted for the LVIA in accordance with best practice as set out in the GLVIA3 as relevant to EIA schemes, comprising:
- A description of the existing landscape and visual context in which the Proposed Scheme has been assessed (set out in **Technical Appendix 5.1** and summarised in this Chapter);
  - A prediction of the likely changes to the landscape and visual receptors resulting from the Proposed Scheme (set out at **Technical Appendix 5.2**); and
  - An assessment of the level and nature (beneficial or adverse) of the effects resulting from the likely changes and whether the effect is significant (set out at **Technical Appendix 5.2** and summarised in this Chapter).
- 5.2.15 The assessment considers the following:
- Effects during construction;
  - Effects at development completion (Year 1), without mitigation planting measures reaching maturity; and



- Effects at development Year 15. These effects are assessed at Year 15, when landscape mitigation planting would be expected to be mature.

5.2.16 The likely effects of the Proposed Scheme on the landscape resource and visual amenity are assessed through the combination of: an assessment of a number of representative viewpoints; desk research; and fieldwork. Through this work, a more precise understanding of the baseline conditions of the Site can be gained.

5.2.17 The second stage of the landscape and visual assessment describes:

- Effects on the Landscape Character: The effects which may arise as a result of the Proposed Scheme on discrete character areas and/or character types comprising features that may possess a particular quality or merit; and
- Visual Effects: Effects that may arise as a result of the Proposed Scheme on views from visual receptors, such as users of local rights of way, and upon the amenity value of the views from surrounding users.

5.2.18 The detailed methodology for the assessment of effects is included at **Appendix EDP 1** within **Technical Appendix 5.1**.

### Receptor Sensitivity/Value

5.2.19 The sensitivity of affected receptors has been considered on a scale of very high, high, medium, low or very low.

5.2.20 A number of factors influence professional judgement when assessing the degree to which a particular landscape or visual receptor can accommodate change arising from a particular development:

- Sensitivity is made up of judgements about the 'value' attached to the receptor, which is determined at baseline stage, and the 'susceptibility' of the receptor, which is determined at the assessment stage when the nature of the proposals, and therefore the susceptibility of the landscape and visual resource to change, is better understood; and
- Within GLVIA3, susceptibility indicates "*the ability of a defined landscape or visual receptor to accommodate the specific Proposed Scheme without undue negative consequences*". Susceptibility of visual receptors is primarily a function of the expectations and occupation or activity of the receptor. A degree of professional judgement applies in arriving at the susceptibility for both landscape and visual receptors and this is clearly set out in the technical appendices to this assessment.

5.2.21 A location may have different levels of sensitivity according to the types of visual receptors at that location and any one receptor type may be accorded different levels of sensitivity at different locations.

5.2.22 **Table 5.3** provides an indication of the criteria by which the overall value of a landscape receptor is judged within this assessment. **Table 5.4** provides an indication of the criteria by which the overall susceptibility of the landscape receptor is judged in relation to the type of development proposed.



**Table 5.3: Assessment of Landscape Value**

Landscape Character Area Value				
Very Low	Low	Medium	High	Very High
Undesignated countryside and landscape features; absence of distinctive landscape characteristics; despoiled/degraded by the presence of many landscape detractors.	Undesignated countryside and landscape features; few distinctive landscape characteristics; presence of landscape detractors.	Undesignated countryside and landscape features; some distinctive landscape characteristics; few landscape detractors.	Locally designated/valued countryside (e.g. Areas of High Landscape Value, Regional Scenic Areas) and landscape features; many distinctive landscape characteristics; very few landscape detractors.	Nationally/internationally designated/valued countryside and landscape features; strong/distinctive landscape characteristics; absence of landscape detractors.
Consideration of Other Value Criteria				
Condition/Quality				
A landscape with no or few areas intact and/or in poor condition.	A landscape with few areas that are intact and/or in a reasonable condition.	A landscape with some areas that are intact and/or in reasonable condition.	A landscape with many areas that are intact and/or in a reasonable condition.	A landscape with most areas intact and/or in good condition.
Scenic Quality				
A landscape of little or no aesthetic appeal.	A landscape of low aesthetic appeal.	A landscape of some aesthetic appeal.	A landscape of high aesthetic appeal.	A landscape of very high aesthetic appeal.
Rarity and Representativeness				
A landscape that does not contain rare landscape types or features.	A landscape that contains few distinct landscape types or features.	A landscape that contains distinct but not rare landscape types or features.	A landscape that contains one or more rare landscape types or features.	A landscape that is abundant in rare landscape types or features.
Conservation Interests				
A landscape with no or very limited cultural, geological and/or nature conservation content.	A landscape with limited cultural, geological and/or nature conservation content.	A landscape with some cultural, geological and/or nature conservation content.	A landscape with rich cultural, geological and/or nature conservation content.	A landscape with abundant cultural, geological and/or nature conservation content.



Landscape Character Area Value				
<b>Recreation Value</b>				
A landscape with no or very limited contribution to recreational experience.	A landscape with no or limited contribution to recreational experience.	A landscape that provides some contribution to recreational experience.	A landscape that provides a good contribution to recreational experience.	A distinct landscape that forms a strong contribution to recreational experience.
<b>Perceptual Aspects</b>				
A landscape with prominent detractors, probably part of the key characteristics.	A landscape with landscape detractors, and is not particularly wild, tranquil or unspoilt.	A landscape with few detractors that also retains some perceptual values.	A landscape with very few detractors that has a relatively wild, tranquil or unspoilt landscape.	A wild, tranquil or unspoilt landscape without noticeable detractors.
<b>Cultural Associations</b>				
A landscape without recorded associations.	A landscape with few recorded associations.	A landscape with some and/or moderately valued associations.	A landscape with numerous and/or highly valued associations.	A landscape of rich and/or very highly valued associations.
<b>Overall Judgement of Landscape Value</b>				
Very Low value – receptor largely reflects very low value criteria above.	Low value – receptor largely reflects low value criteria above.	Medium value – receptor largely reflects medium value criteria above.	High value – receptor largely reflects high value criteria above.	Very High value – receptor largely reflects very high value criteria above.

**Table 5.4: Assessment of Landscape Susceptibility**

Very Low Susceptibility to Change	Low Susceptibility to Change	Medium Susceptibility to Change	High Susceptibility to Change	Very High Susceptibility to Change
<b>Pattern, Complexity and Physical Susceptibility to Change to the Proposed Scheme</b>				
A simple, monotonous and/or degraded landscape with common/indistinct features and minimal variation in landscape pattern.	A landscape with an occasionally intact pattern and/or with a low degree of complexity and with few features in reasonable condition.	A landscape with some intact pattern and/or with a degree of complexity and with features mostly in reasonable condition.	A landscape with mostly patterned/textured or a simple but distinctive landscape and/or with high value features and essentially intact.	A strongly patterned/textured or a simple but distinctive landscape and/or with high value features intact.
<b>Visual Susceptibility to Change to the Proposed Scheme</b>				
A very enclosed landscape that contains or strongly filters views, with an absence of visual landmarks and a lack of intervisibility with designated landscapes.	A predominantly enclosed landscape that contains or at filters most views, with very few views of visual landmarks or intervisibility with designated landscapes.	A partially enclosed landscape with some visual containment and filtering, possible limited intervisibility with visual landmarks and designated landscapes.	An open landscape with intervisibility and limited visual filtering or enclosure. Prominent visual landmarks may be present, and/or intervisibility with designated landscapes may occur.	An open or exposed landscape with extensive intervisibility and no or very limited visual filtering or enclosure. Prominent visual landmarks are present, and/or intervisibility with designated landscapes occurs.
<b>Experiential Susceptibility to Change to the Proposed Scheme</b>				
<p>A landscape with prominent visual and/or aural intrusion and close relationship with large-scale built development/infrastructure.</p> <p>A landscape that contains many light sources and essentially suffers from widespread light pollution.</p>	<p>A busy landscape with frequent visual and/or aural intrusion and nearby relationship with large-scale built development/infrastructure.</p> <p>A landscape that contains frequent light sources and suffers from light pollution.</p>	<p>A partially tranquil landscape with limited visual and/or aural intrusion, some relationship with built development/infrastructure may be present. A landscape that contains some light sources.</p>	<p>A tranquil landscape with limited visual and/or aural intrusion, some relationship with built development/infrastructure may be present. A landscape that contains few light sources.</p>	<p>A very tranquil, wild or remote landscape with little or no sense of visual or aural intrusion.</p> <p>A landscape that contains very few light sources and provides dark skies.</p>

Very Low Susceptibility to Change	Low Susceptibility to Change	Medium Susceptibility to Change	High Susceptibility to Change	Very High Susceptibility to Change
<b>Overall Judgement of Susceptibility to Change to the Proposed Scheme</b>				
Very Low susceptibility – receptor largely reflects very low criteria above.	Low susceptibility – receptor largely reflects low criteria above.	Medium value – receptor largely reflects medium criteria above.	High susceptibility – receptor largely reflects high criteria above.	Very High susceptibility – receptor largely reflects very high criteria above.

- 5.2.23 **Table 5.5** provides an indication of the criteria by which the overall sensitivity of the landscape resource is judged within this assessment and considers both value and susceptibility independently.

**Table 5.5: Assessment of Landscape Sensitivity**

		Sensitivity of Landscape Receptor				
		Very High	High	Medium	Low	Very Low
Receptor Value	Very High	Very High	Very High/High	High	High/Medium	Medium
	High	Very High/High	High	High/Medium	Medium	Medium/Low
	Medium	High	High/Medium	Medium	Medium/Low	Low
	Low	High/Medium	Medium	Medium/Low	Low	Low/Very Low
	Very Low	Medium	Medium/Low	Low	Low/Very Low	Very Low

- 5.2.24 For visual receptors, judgements of susceptibility and value are closely interlinked considerations. For example, the most valued views are those that people go and visit because of the available view, and it is at those viewpoints that their expectations will be highest and thus most susceptible to change.
- 5.2.25 **Table 5.6** provides an indication of the criteria by which the overall sensitivity of a visual receptor is judged within this assessment and considers both value and susceptibility independently.

**Table 5.6 Visual Receptor Sensitivity**

Category	Visual Receptor Criteria
Very High	<p>Designed view (which may be to or from a recognised heritage asset or other important viewpoint), or where views of the surroundings are an important contributor to the experience. Key promoted viewpoint, e.g. interpretative signs. References in literature and art and/or guidebooks tourist maps. Protected view recognised in planning policy designation.</p> <p>Examples may include views from residential properties, especially from rooms normally occupied in waking or daylight hours; national PROWs, e.g. National Trails and nationally designated countryside/landscape features with public access, which people might visit purely to experience the view; and visitors to heritage assets of national importance.</p>



Category	Visual Receptor Criteria
High	<p>View of clear value but may not be formally recognised, e.g. framed view of high scenic value, or destination hill summits. It may also be inferred that the view is likely to have value, e.g. to local residents.</p> <p>Examples may include views from recreational receptors where there is some appreciation of the landscape, e.g. golf and fishing; local PROWs, access land and National Trust land, also panoramic viewpoints marked on maps; road routes promoted in tourist guides for their scenic value.</p>
Medium	<p>View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor.</p> <p>Examples may include people engaged in outdoor sport other than appreciation of the landscape, e.g. football and rugby, or road users on minor routes passing through rural or scenic areas.</p>
Low	<p>View of clearly lesser value than similar views experienced from nearby visual receptors that may be more accessible.</p> <p>Examples may include road users on main road routes (motorways/A roads) and users of rail routes or people at their place of work (where the place of work may be in a sensitive location). Also views from commercial buildings where views of the surrounding landscape may have some limited importance.</p>
Very Low	<p>View affected by many landscape detractors and unlikely to be valued.</p> <p>Examples may include people at their place of work, indoor recreational or leisure facilities or other locations where views of the wider landscape have little or no importance.</p>

5.2.26 The tables above offer a template for assessing the overall sensitivity of any landscape or visual receptor as determined by combining judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape as set out at paragraph 5.39 of GLVIA3. However, the narrative in this report may demonstrate that assessment of overall sensitivity can change on a case-by-case basis.

5.2.27 For example, a high susceptibility to change and a low value may result in a medium overall sensitivity, unless it can be demonstrated that the receptor is unusually susceptible or is in some particular way more valuable. A degree of professional judgement applies in arriving at the overall sensitivity for both landscape and visual receptors.

### Magnitude of Change

5.2.28 The magnitude of change has been considered as the change experienced from the current baseline conditions at the sensitive receptor and has been considered on a scale of **very high, high, medium, low, very low**.

5.2.29 The magnitude of any landscape or visual change is determined through a range of considerations particular to each receptor. The three attributes considered in defining the magnitude are:

- Scale of change;
- Geographical extent; and



- Duration and reversibility/proportion.

5.2.30 Receptor locations from which views of the Proposed Scheme are not likely to occur will receive no change and therefore no effect. With reference to the Zone of Theoretical Visibility (ZTV) and site survey, the magnitude of change is defined for receptor locations from where visibility of the Proposed Scheme is predicted to occur.


5.2.31 **Table 5.7** provides an indication of the criteria by which the size/scale of change at a landscape or visual receptor is judged within this assessment.

**Table 5.7: Landscape and Visual Receptor Magnitude of Change Criteria**

Category	Landscape Receptor Criteria	Visual Receptor Criteria
Very High	Total loss of or major alteration to key elements/features/characteristics of the baseline condition. Addition of elements which strongly conflict with the key characteristics of the existing landscape.	There would be a substantial change to the baseline, with the Proposed Scheme creating a new focus and having a defining influence on the view.
High	Notable loss or alteration to one or more key elements/features/characteristics of the baseline condition. Addition of elements that are prominent and may conflict with the key characteristics of the existing landscape.	The Proposed Scheme will be clearly noticeable, and the view would be fundamentally altered by its presence.
Medium	Partial loss or alteration to one or more key elements/features/characteristics of the baseline condition. Addition of elements that may be evident but do not necessarily conflict with the key characteristics of the existing landscape.	The Proposed Scheme will form a new and recognisable element within the view which is likely to be recognised by the receptor.
Low	Minor loss or alteration to one or more key elements/features/characteristics of the baseline landscape. Addition of elements that may not be uncharacteristic within the existing landscape.	The Proposed Scheme will form a minor constituent of the view being partially visible or at sufficient distance to be a small component.
Very Low	Barely discernible loss or alteration to key elements/features/characteristics of the baseline landscape. Addition of elements not uncharacteristic within the existing landscape.	The Proposed Scheme will form a barely noticeable component of the view, and the view whilst slightly altered would be similar to the baseline situation.



Table 5.8: Geographical Extent Criteria

	Landscape Receptors	Visual Receptor Criteria
<b>Largest</b>  <b>Smallest</b>	Large scale effects influencing several landscape types or character areas.	Direct views at close range with changes over a wide horizontal and vertical extent.
	Effects at the scale of the landscape type or character areas within which the Proposed Scheme lies.	Direct or oblique views at close range with changes over a notable horizontal and/or vertical extent.
	Effects within the immediate landscape setting of the Site.	Direct or oblique views at medium range with a moderate horizontal and/or vertical extent of the view affected.
	Effects at the Site level (within the Site itself).	Oblique views at medium or long range with a small horizontal/vertical extent of the view affected.
	Effects only experienced on parts of the Site at a very localised level.	Long range views with a negligible part of the view affected.

- 5.2.32 The third, and final, factors in determining the predicted magnitude of change are duration and reversibility. Duration and reversibility are separate but linked considerations. Duration is judged according to the defined terms set out below, whereas reversibility is a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation. The categories used in this assessment are set out below:

Duration:

- Long term (10 years+);
- Medium term (1 to 10 years); or
- Short term (0 to 1 year).

Reversibility:

- Permanent with unlikely restoration to original state, e.g. major road corridor, power station, urban extension, etc.;
- Permanent with possible conversion to original state, e.g. agricultural buildings, retail units;
- Partially reversible to a different state, e.g. mineral workings;
- Reversible after decommissioning to a similar original state, e.g. wind energy development; or
- Quickly reversible, e.g. temporary structures.





## Determining the Level of Effect

- 5.2.33 The purpose of the EIA process is to identify the significant environmental effects (both beneficial and adverse) of development proposals. Schedule 4 to the EIA Regulations specifies the information to be included in all environmental statements, which should include a description of:

*“The description of the likely significant effects ...should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.”*

- 5.2.34 In order to consider the likely significance of any effect, the sensitivity of each receptor is combined with the predicted magnitude of change to determine the level and significance of effect, with reference also made to the geographical extent, duration and reversibility of the effect within the assessment. Having taken such a wide range of factors into account when assessing sensitivity and magnitude at each receptor, the significance of effect can be derived by combining the sensitivity and magnitude in accordance with the matrix in **Table 5.9**.

**Table 5.9: Level of Effect Matrix**

Overall Sensitivity	Overall Magnitude of Change				
	Very High	High	Medium	Low	Very Low
Very High	Very Substantial	Substantial	Major	Major/- Moderate	Moderate
High	Substantial	Major	Major/ Moderate	Moderate	Moderate/- Minor
Medium	Major	Major/- Moderate	Moderate	Moderate/- Minor	Minor
Low	Major/- Moderate	Moderate	Moderate/ Minor	Minor	Minor/- Negligible
Very Low	Moderate	Moderate/ Minor	Minor	Minor/- Negligible	Negligible

- 5.2.35 In certain cases, where additional factors may arise, a further degree of professional judgement may be applied when determining the level of overall change. For example, depending on local circumstances, it may be considered that a moderate effect is not significant, particularly where experienced by a medium, low or very low sensitivity receptor. Where this occurs, further explanation is given.

## Definition of Effects

- 5.2.36 Taking into account the levels of effect described above, and with regard to effects being either adverse or beneficial, the following table represents a description of the range of effects likely at any one receptor.



Table 5.10: Definition of Effect

Category	Definition of Adverse Effects	Definition of Beneficial Effects
Very Substantial	Typically, the landscape or visual receptor is very highly sensitive with the proposals representing a very high adverse magnitude of change. The changes would be at complete variance with the landscape character and would permanently diminish the integrity of a valued landscape or view.	The removal of substantial existing incongruous landscape or visual elements and the introduction or restoration of highly valued landscape elements or built form which would reinforce local landscape character and substantially improve landscape condition and visual amenity.
Substantial	Typically, the landscape or visual receptor is highly sensitive with the proposals representing a high adverse magnitude of change. The changes would be at complete variance with the landscape character and would permanently diminish the integrity of a valued landscape or view.	The removal of substantial existing incongruous landscape or visual elements and the introduction or restoration of highly valued landscape elements or built form which would reinforce local landscape character and substantially improve landscape condition and visual amenity.
Major	Typically, the landscape or visual receptor has a high to medium sensitivity with the proposals representing a high to medium adverse magnitude of change to the view or landscape resource. Changes would result in a fundamental change to the landscape resource or visual amenity.	The removal of existing incongruous landscape/visual elements and the introduction or restoration of some valued landscape or visual elements would complement landscape character and improve landscape condition, and improve the local visual amenity.
Moderate	Typically, the landscape or visual receptor has a medium to low sensitivity with the proposals representing a high to medium magnitude of change. The proposals would represent a material but non-fundamental change to the landscape resource or visual amenity.	The removal of some existing incongruous landscape elements and/or the introduction or restoration of some potentially valued landscape elements which reflect landscape character and result in some improvements to landscape condition and/or visual amenity.



Category	Definition of Adverse Effects	Definition of Beneficial Effects
Minor	Typically, the landscape or visual receptor has a low sensitivity with the proposals representing a medium to low magnitude of change. The proposals would result in a slight but non-material change to the landscape resource or visual amenity.	Some potential removal of incongruous landscape features or visual amenity, although more likely the existing landscape and/or resource is complemented by new landscape features or built features compliant with the local landscape and published landscape character assessments.
Negligible	Typically, the landscape or visual receptor has a low or very low sensitivity with the proposals representing a very low magnitude of change. There would be a detectable but non-material change to the landscape resource or visual amenity.	The proposals would result in minimal positive change to the landscape or visual resource, either through perceptual or physical change, and any change would not be readily apparent but would be coherent with ongoing change and process, and coherent with published landscape character assessments.
None	Typically, the landscape receptor has a very low sensitivity with the proposals resulting in no loss or alteration to the landscape resource or change to the view. There would be no detectable change to the landscape resource or visual amenity.	There would be no detectable positive or negative change to the landscape resource or visual amenity.

- 5.2.37 Effects can be adverse (negative), beneficial (positive) or neutral. The landscape effects will be considered against the landscape baseline, which includes published landscape strategies or policies if they exist. Changes involving the addition of large-scale man-made objects are typically considered to be adverse as they are not usually actively promoted as part of published landscape strategies.
- 5.2.38 Visual effects are more subjective as people's perception of development varies through the spectrum of negative, neutral and positive attitudes. In the assessment of visual effects, the assessor will exercise objective professional judgement in assessing the level of effects and, unless otherwise stated, will assume that all effects are adverse, thus representing the worst-case scenario.

### Determining Significance

- 5.2.39 For each effect, a statement has been made where the level of effect is 'Significant'. This determination has been based on professional judgement and/or relevant guidance/legislation where applicable. Effects that are 'Not Significant' are discussed further in **Technical Appendix 5.2**.
- 5.2.40 Significance has only been concluded for residual effects (i.e. following the identification of secondary mitigation).



## 5.3 Baseline Environment

- 5.3.1 This section considers baseline landscape character matters and identifies other landscape resource receptors that are relevant to the assessment. Baseline conditions in respect of the published local landscape character assessments are summarised below, followed by a summary of EDP's own assessment of the character of the Site and local context.
- 5.3.2 The below forms a summary of the landscape and visual baseline appraisal conditions of the Site and surrounding context, for full details refer to **Technical Appendix 5.1**.

### Baseline Landscape Resource

#### Landscape-related Designations and Other Considerations

- 5.3.3 The Site is not within any national landscape designation, though the Wye Valley National Landscape lies c.100m to the west.
- 5.3.4 Locally, the Site falls within a Green Wedge designation under Monmouthshire's current Local Development Plan (LDP, 2014), which aims to prevent the coalescence of nearby settlements—specifically Chepstow, Pwllmeyric, and Mathern—by preserving their individual character and identity.
- 5.3.5 Policy LC6 outlines five key functions of the Green Wedge, and the proposal is assessed against each:
- Preventing coalescence: The development would not bring Chepstow any closer to Pwllmeyric than its current proximity (approx. 600m). Existing vegetation screens views between the Site and Pwllmeyric, meaning visual perception of closeness would not increase.
  - Managing urban form and preventing countryside encroachment: The Site infills land between existing developments (St Lawrence Lane and High Beeches), representing a logical rounding off of the settlement rather than expansion into open countryside.
  - Protecting the setting of an urban area: The proposal would not impact the historic core of Chepstow (the key focus for protection), as it lies away from the historic riverfront and aligns with previous modern developments in the area.
  - Encouraging urban regeneration through brownfield reuse: While the reuse of previously developed land is preferred, the pressing need for housing and employment land in Monmouthshire justifies greenfield development in this instance.
- 5.3.6 EDP concludes that the proposal does not undermine the Green Wedge's objectives, and the Site could be excluded from the designation without compromising its intended purpose. The Site's existing boundaries offer clear and defensible limits to future development.
- 5.3.7 Additionally, during the previous LDP examination, the planning inspector highlighted that land west of Chepstow might be the least harmful location for future development. He also stated that a permanent Green Belt in the area would be overly restrictive, implying that even the Green Wedge may need to be reconsidered during the next LDP review.
- 5.3.8 The Green Wedge designation has been reviewed in depth within **Technical Appendix 5.1**, and following the outcome summarised above, it is not considered any further within this assessment.



## National Landscape Character

- 5.3.9 At a national level, the character of Wales has been classified into National Landscape Character Areas (NLCA) published by Natural Resources Wales (NRW). The Site is located within the north-eastern corner of NLCA 34: Gwent Levels <sup>4</sup>.
- 5.3.10 NLCA 34: Gwent Levels is described as an area that is *“a distinctive, flat, lowland landscape with a geometric patchwork of watercourses that run between fertile fields. It is remarkable for having been created by reclaiming marshland and inter-tidal areas during successive periods going back to Roman times. In parts, the older patterns have changed almost beyond recognition over the past 150 years, sections having been built over by a major railway line, two motorways, a large steelworks, and a power station. In addition, there has been a rapid growth of once small settlements into dormitory villages, and urban expansion from both Cardiff and Newport”*.
- 5.3.11 From the high-level description of the national character area, it is clear that the Site, which sits on the peripheries of NLCA34, contains large differences to those key qualities identified above. Additionally, it is likely to be a too broad a scale to reliably inform an assessment of the suitability of the development proposals. This assessment therefore includes a character assessment that is described and evaluated in further detail within the LANDMAP Character Assessment.

### LANDMAP Character Assessment

- 5.3.12 In order to assess the acceptability of development, in landscape terms at any specific location, it is important to understand the landscape and visual amenity circumstances against which any decisions are made, based on both published Landscape Character Assessments (LCA) and more site-specific landscape assessment undertaken through field site studies and site appraisal.
- 5.3.13 The landscape character of the Site and the surrounding area is defined within the LANDMAP resource managed by NRW<sup>5</sup>. LANDMAP is the national information system used to undertake an assessment of landscape character at a local scale. LANDMAP is a GIS-based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a naturally consistent data set. It identifies key landscape characteristics and qualities that can be used to aid planning policy and decisions. The accompanying guidance states that it is the use of all five layers of information (Historic Landscapes, Visual and Sensory, Cultural Landscape, Geological Landscape and Landscape Habitats) that promotes sustainable landscape decision making, giving all five layers equal consideration.
- 5.3.14 The Site is contained within LANDMAP 'aspect areas' summarised in **Table 5.11** below. Each aspect area is described, assessed and assigned one of four overall grades of value below:
- Low: Little or no importance;
  - Moderate: Local importance;
  - High: Regional or county importance; and
  - Outstanding: International or national importance.

<sup>4</sup> NLCA 34 Gwent Levels <https://cdn.cyfoethnaturiol.cymru/media/682619/nlca34-gwent-levels-description.pdf?mode=pad&rnd=131550624534930000> – Accessed 08.02.2024.

<sup>5</sup> <https://smnr-nrw.hub.arcgis.com/apps/c7770d2881394c899123bae210afe370/explore> - Accessed 28.05.25.



**Table 5.11: LANDMAP Character Assessment**

Aspect Area	Host Area Name/Classification	Evaluation
Geological Landscape	<b>St Arvans</b> Lowland Hills and Valleys/Dissected Lowland Plateau/Lowland Plateau	High
Landscape Habitat	<b>S. Rural Monmouthshire</b> Dry (Relatively) Terrestrial Habitats/Grassland and Marsh/Improved Grassland	Moderate
Visual and Sensory	<b>Chepstow Woods</b> Lowland/Rolling Lowland/Mosaic Rolling Lowland	High
Historic Landscape	<b>St. Pierre Pill</b> Rural environment/Agricultural/Regular Fieldscapes	High
Cultural Landscape	<b>Chepstow Woods</b> Lowland/Rolling Lowland/Mosaic Rolling Lowland	-

- 5.3.15 A summary of LANDMAP's evaluations, alongside discussion on the key characteristics for each Aspect Area, in relation to the Site can be found within **Technical Appendix 5.1**.

#### **Review of Site Circumstances against Published Documentation**

- 5.3.16 A Site visit took place in February 2024 in clear weather conditions. The visit was complemented by a review of aerial photography, mapping and field assessments from publicly accessible locations (e.g. from local roads and PRow).
- 5.3.17 The Site covers around 12 hectares and consists of five loosely defined fields, primarily used as pasture. The Site lies on the western edge of Chepstow and is mostly bordered by 20<sup>th</sup> century development to the north and east. However, there are some exceptions, including the Grade II listed St Lawrence House, which overlooks the north-west and central areas of the Site and influences the local landscape character. **Figure 5.2** illustrates the Site's overall arrangement and nearby context.
- 5.3.18 The eastern boundary runs alongside the busy A466, with minimal screening. To the south, the A48 briefly borders the Site before meeting other major roads at the Highbeech roundabout. The western boundary is defined by substantial vegetation along the winding St Lawrence Lane, which limits both visual and physical access to the Site. To the north is Mounton Road, which doesn't connect directly to northern developments but is frequently used by pedestrians as an alternative to nearby public rights of way. While some older buildings line Mounton Road, they are mostly hidden from view by a high stone wall.
- 5.3.19 The Site's landscape is generally undulating, with a gentle slope descending from the north-east to the south-west. Subtle variations in elevation shape the visual connection between the Site and its surroundings. St Lawrence House and other homes along Mounton Road sit on higher ground, offering wide views across the area. The western boundary, like St Lawrence Lane, is particularly uneven, while the land becomes flatter and more open toward the eastern edge near the A466.
- 5.3.20 Local character assessments describe the area as part of the 'Chepstow Woods' landscape, featuring rolling terrain and distant views of the Severn Estuary. LANDMAP identifies the area as farmland with varied uses; while the Site itself is used for grazing, nearby land includes arable fields.
- 5.3.21 EDP generally agrees with these character assessments regarding visual and physical features but highlights key differences—particularly the impact of Chepstow's western edge, nearby busy roads, and



surrounding residential development. These urban elements significantly reduce the sense of tranquillity and rural character on the Site.

- 5.3.22 According to the LANDMAP assessment, the Site's Landscape Habitat aspect is rated as moderate. The area consists mainly of large, open grazing fields, which are of low ecological value in terms of supporting diverse wildlife. However, wooded boundaries, hedgerows, and hedgerow trees provide some ecological enhancement. EDP agrees with LANDMAP's overall evaluation.
- 5.3.23 Culturally, the Site lacks designated routes and is not publicly accessible, though busy roads and cycle paths run nearby. The broader Chepstow Woods area lacks an evaluation, and while there are some Public Rights of Way (PROW) in the surrounding area, few are directly connected to the Site. EDP considers the Site and its immediate context to have limited recreational value.
- 5.3.24 Historically, the Site is considered to have high value according to LANDMAP, due to its proximity to designated historic parks and gardens such as the Wyelands Registered Historic Park and Garden, located just south of the A48. However, the Site is visually separated from this area by trees and infrastructure. In contrast, the Grade II listed St Lawrence House directly overlooks and influences parts of the Site, particularly in the northwest. EDP agrees with the high historical value rating and acknowledges the Site's contribution to the historic landscape.

#### Assessing the Value of the Landscape Resource

- 5.3.25 **Technical Appendix 5.1** assesses the Site and surrounding landscape in terms of value, with particular reference to the criteria set out in *Technical Guidance Note (TGN) 02/21: Assessing Landscape Value Outside National Designations*. A detailed evaluation of these factors is presented in **Table EDP 3.2** within the appendix.

#### Interim Conclusions: Sensitivity of Landscape Resource

##### Overall Sensitivity of the Site's Immediate and Wider Context

- 5.3.26 The susceptibility of the landscape and townscape resource is defined as the ability of the receptor-whether in terms of overall character, individual fabric elements, or perceptual qualities-to accommodate the proposed development without undue consequences for the maintenance of the baseline condition.
- 5.3.27 The following judgements are presented in line with the assessment methodology presented at **5.2.12** of this ES Chapter.

##### Within Settlement

- 5.3.28 The landscape surrounding the Site exhibits a varied character and corresponding range of sensitivities. To the east, the western edge of Chepstow is urbanised and characterised by busy road corridors and built development. These areas are already subject to visual and physical change and therefore have a **low** susceptibility to additional development. This combines with a low value, yielding a low overall sensitivity.

##### Outside of Settlement and Outside of the Wye Valley National Landscape

- 5.3.29 To the west of the Site, but outside the National Landscape, the character becomes more rural, particularly around Pwllmeyric. While this area is influenced by the presence of the A48, which introduces noise and movement, the overall landscape retains a degree of rural character and coherence. These distinctions align broadly with the evaluations found within the LANDMAP assessment, though it is recognised that infrastructure such as the A48/A466 corridor does diminish localised perceptual qualities in some areas. This results in a high susceptibility to change. This combines with a low value (mostly due to its current use as intensive agricultural land that is inaccessible to the public). Overall, this creates a **medium** overall sensitivity.





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#### Outside of Settlement and within the Wye Valley National Landscape

- 5.3.30 Further west, within the Wye Valley National Landscape, the landscape is of **high** sensitivity, owing to its designated status, scenic quality, and perceptual attributes such as tranquillity and relative remoteness. This derives from a combination of high receptor value and susceptibility to change. With this in mind, effects, given the designation is away from the Site, will be limited to perceptual, indirect effects. Existing detractors within the landscape such as individual properties and overhead power lines detract from the character of the immediate landscape within the Site's context. Intervisibility is limited, and the influence of the Site within views on the overall character of the designation is expected to be minimal. Effects on the character of the designation are considered within **sections 5.5** and **5.6** of this ES chapter.

#### **Overall Sensitivity of the Site Character**

- 5.3.31 In summary, the most valued characteristics/aspects of the Site are its historic pedigree and ability to support wildlife and ecosystems in its western tree belts and hedgerows/hedgerow trees. Long range views towards the Severn estuary also benefits the Site. The character is, as noted, impacted greatly by the neighbouring developments with little separation to nearby travel corridors. The Site is judged to have a medium susceptibility to change, which combines with a medium value to create a **medium** overall sensitivity.

#### **Baseline Visual Resource**

##### **Defining Zones of Theoretical and Primary Visibility**

- 5.3.32 The starting point for an assessment of visual amenity is a computer-generated 'zone of theoretical visibility' (ZTV). The ZTV is derived using digital landform height data only and therefore it does not account for the screening effects of intervening buildings, structures or vegetation, but it does give a prediction of the areas that, theoretically, may be able to experience visual change; it thus provides the basis for more detailed field assessment.
- 5.3.33 The ZTV is then refined by walking and driving local roads, rights of way and other publicly accessible viewpoints to arrive at a more accurate, 'field-tested' zone of primary visibility (ZPV). The ZPV is where views of the proposed development would normally be close-ranging and open, whether in the public or private domain, on foot, cycling or in a vehicle. In this instance, the field assessment was undertaken by a Chartered Landscape Architect in February 2024 in clear weather conditions and therefore confidently predicts the extent of wintertime views of the proposed development.
- 5.3.34 Beyond the ZPV lies a zone of visibility that is less open, being either partly screened or filtered. Views from within this zone would include the proposal - it may not be immediately noticeable, but once recognised would be a perceptible addition to the view.
- 5.3.35 **Figure 5.5** illustrates the findings of the visual assessment from which it can be seen that the ZPV extends as follows:
- To the north, views are limited by intervening built form, and a large stone wall along the alignment of Mounton Road;
  - To the south/west, views towards the Site are mostly limited by hedgerows and woodland along the south-western site boundary alignment;
  - To the east, views are limited to within some 40m, from across the A466 as far as residential development on the opposite side of the road; and
  - To the west, views are mostly limited by large boundary features and the rolling local landform.



### Defining Receptor Groups

- 5.3.36 Within the ZPV and wider area, the people ('receptors') likely to experience visual change can be considered as falling into a number of discernible groups. The visual receptors below have been extracted from **Technical Appendix 5.1**, and features only receptors with possible visibility towards the Site;

#### Public Right of Way (PRoW)

- 5.3.37 Although the Site is surrounded by a network of Public Rights of Way (PRoW), it is largely enclosed by substantial boundary features, except along its eastern edge. Views from many of these routes are blocked by existing vegetation, buildings, or landforms.
- **North:** Footpaths 373/75/1 and 355/4/4 offer very limited visibility of the Site due to 20th-century development at Bayfield and a large stone wall along Mounton Road. These routes are excluded from further analysis.
  - **East:** Few PRoW exist in this direction due to the urban character of Chepstow. Footpath 355/14(3)/3 lies approximately 800 metres from the Site, near the River Wye. Ridgelines between the footpath and the Site prevent visibility, so it is also excluded.
  - **South:** A small network of footpaths within the Wyelands Registered Historic Park and Garden generally runs east to west, linking nearby villages. Mature trees and vegetation along the Site's boundary and the A48 screen views, so these southern routes are scoped out due to limited visibility.
  - **West:** The most concentrated network of PRoW lies here and typically exhibits a rural character, although the presence of nearby roads reduces tranquillity. Footpath 373/68/1 provides filtered views of the Site's western edge, including parts of the open grassland and nearby semi-rural properties. While these routes fall within the Wye Valley National Landscape and are considered highly sensitive, dense woodland limits views mostly to the Site's periphery.
  - **South-west:** Several PRoW near Chepstow Garden Centre, including footpath 373/60/1 (approximately 2km from the site), provide only distant and very limited views of the Site.

- 5.3.38 Overall, visibility of the Site from surrounding PRoW remains generally limited due to a combination of vegetation, topography, and existing built form.

#### Road Users: Major Roads

- 5.3.39 Views towards the Site from roads are limited to those running adjacent to or in close proximity to the Site as listed below.
- 5.3.40 Users of A roads are typically given a low sensitivity while users of minor roads and lanes are generally given a **medium** sensitivity. Users of the following road routes have been considered as part of this assessment:

#### *A466/Wye Valley Link Road*

- 5.3.41 The A466 is a major route connecting the M4 near Thornwell to Hereford and the A49. Along the Site's eastern boundary, users of the A466 experience clear and open views, with only minimal screening provided by a sparse post-and-wire fence and a few scattered trees. Street furniture such as lampposts and telecoms masts further reduce visual quality in this area, as shown in **Photoviewpoint EDP 4**, contained within **Technical Appendix 5.1**.



- 5.3.42 As the road continues south toward the M4, views of the Site become more limited due to changes in elevation and intervening vegetation, particularly where the A466 meets the A48. This reduced visibility is illustrated in **Photoviewpoint EDP 1**, found within **Technical Appendix 5.1**, taken approximately 250 metres south of the Site near the Highbeech roundabout.
- 5.3.43 Due to the fast-moving traffic, frequent visual detractors, and general urban character of the route, the sensitivity of road users along the A466 is considered **low**, as per the criteria at 5.2.12 et seq of this ES Chapter.
- A48*
- 5.3.44 The A48 borders the Site briefly along its southern edge near the Highbeech roundabout. Clear views are possible between this junction and St Lawrence Lane (see **Photoviewpoint EDP 3** within **Technical Appendix 5.1**), but beyond this, substantial vegetation blocks visibility (**Photoviewpoint EDP 2**).
- 5.3.45 Further west and at greater distances, such as near Chepstow Garden Centre (c.1.8 km away), the Site is not visible.
- 5.3.46 As a busy, fast-moving road, the A48 is experienced transiently by drivers. Therefore, users are assigned **low** sensitivity to visual change.
- 5.3.47 *M4*
- 5.3.48 The M4, approximately 1.5 km from the Site, is almost entirely screened by landform and vegetation. Views of the Site are highly unlikely. Given the distance, screening, and high travel speeds, users are assigned **very low** sensitivity and are not considered further in this ES nor within any Technical Appendices.

#### Road Users – Minor Roads

##### *Mounton Road*

- 5.3.49 Mounton Road runs along the Site's northern boundary for approximately 500m, linking Chepstow to Mounton Brook. Despite its proximity, views into the Site are largely blocked by residential buildings, including St Lawrence House, and a continuous stone wall. Only limited views are possible from the north-eastern corner (see **Photoviewpoint EDP 5**, contained within **Technical Appendix 5.1**).
- 5.3.50 Due to its semi-rural setting and mixed use by drivers, cyclists, and pedestrians at lower speeds, **medium** sensitivity is assigned.

##### *St Lawrence Lane*

- 5.3.51 St Lawrence Lane runs along the Site's western and south-western boundary, connecting Mounton Road to the A48. It is a narrow, rural road bordered by hedgerows and a dense woodland belt on the Site side, which blocks most views. Occasional glimpses into the grassland are possible where vegetation is thinner, particularly in the northern section (see **Photoviewpoint EDP 9** of **Technical Appendix 5.1**).
- 5.3.52 Given its rural character and low traffic speed, the lane is assigned **medium** sensitivity.

##### *Runsdoms Lane (Near Willis Hill)*

- 5.3.53 Located near the A48 and Chepstow Garden Centre, Runsdoms Lane is a quiet, rural road bordered by well-maintained hedgerows. It is lightly used, enhancing its tranquil, countryside character—particularly for walkers. Although long-range views towards Chepstow and Pwllmeyric are available from higher points (see **Photoviewpoint EDP 10** of **Technical Appendix 5.1**), the Site itself remains well screened by boundary vegetation and intervening features. The route is assigned **medium** sensitivity.



### Residential Dwelling Groups

- 5.3.54 **Technical Appendix 5.1** outlines that views from private residential properties, although likely to be of high to very high sensitivity to changes in the view, are not protected by national planning guidance or local planning policy. Accordingly, changes to the character, 'quality' and nature of private views are not a material planning consideration in the determination of a planning application. However, they remain relevant to this review in regard to the predicted extent and nature of visual change.

#### *Residential Properties along the A466 and St Lawrence Road*

- 5.3.55 Approximately 12 properties lie directly east of the Site, with clear views across the open grassland at distances of around 20m, depending on landform. Any development could significantly alter their outlook. However, the constant noise and activity from the adjacent A466 reduces the overall quality of the visual experience. These properties are assigned **medium** sensitivity.

#### *Residential Properties along Mounton Road*

- 5.3.56 Homes north of Mounton Road, particularly St Lawrence House, enjoy mostly clear views over the Site, extending towards the Severn Estuary. However, views also include detractors such as the A466 and A48, along with Chepstow's urban edge. While foreground views are open and semi-rural, traffic and development reduce their quality. These properties are assigned **high** sensitivity.

#### *Residential Properties at Bayfield*

- 5.3.57 Bayfield comprises mostly 20<sup>th</sup> century housing. Due to a large stone wall along Mounton Road and intervening buildings, views of the Site are limited—mainly possible from upper floors and seen against the backdrop of existing development. These properties are considered to have medium sensitivity.

- 5.3.58 Other Receptors of Interest

#### *Receptors within Wye Valley National Landscape (NL)*

- 5.3.59 The Wye Valley NL lies close to the Site, with Bayfield housing marking its northern boundary. Views from within the NL, including footpaths 373/68/1 (**Photoviewpoint EDP 6 of Technical Appendix 5.1**) and others (**Photoviewpoint EDP 7 of Technical Appendix 5.1**), show that the landscape west of the Site is generally lower, with built development and trees limiting visibility into the Site.
- 5.3.60 Despite limited intervisibility, publicly accessible footpaths within the NL are assigned **very high** sensitivity due to their designation. Nearby rural roads within the NL are given **high** sensitivity, reflecting their transitional character but lower sensitivity than footpaths.

#### *National Cycle Route*

- 5.3.61 National Cycle Route 4 (the Celtic Trail) runs alongside the Site's eastern boundary on the A466 and the northern boundary along Mounton Road. Views of the Site are clear for a short stretch along the A466, though users are often focused on navigating the busy road. Views from Mounton Road are mostly blocked by walls and buildings. The sensitivity of National Cycle Route 4 is assessed as **medium**.

#### *Open Access Land*

- 5.3.62 Extensive Open Access Land covers the ancient woodland west of the Site. Views of the Site are almost completely blocked by landform and woodland. Where views are possible, nearby Bayfield's residential area is prominent, while the Site lies out of sight due to rising topography. Therefore, Open Access Land is excluded from further assessment in this report.

### **Representative Viewpoint Selection**

- 5.3.63 Based on fieldwork observations and the findings of the desk-based review, a number of representative viewpoints, or photoviewpoints, have been selected, the locations of which are shown on **Figure 5.5**,



within **Appendix 5.1**, while the views themselves are shown within **Photoviewpoints EDP 1 to 11** at **Appendix EDP 2**, within **Technical Appendix 5.1**.

- 5.3.64 The selection of the representative viewpoints is based on the principle that the assessment needs to test the 'worst case' scenario, and in selecting these viewpoints, EDP has sought to include:
- A range of viewpoints from all points of the compass, north, south, east and west;
  - A range of viewpoints from distances at close quarters at the Site boundary and up to distant viewpoints beyond 2km from the Site; and
  - Viewpoints from all the above receptor groups, except those scoped out of further consideration.
- 5.3.65 The representation of views is supported by 11 photoviewpoints (PVPs), the number and location of which has been agreed with the LPA. The purpose of these viewpoints is to aid the assessment of visual receptor(s).

**Table 5.12:** Summary of Representative Photoviewpoints

PVP No.	Location	Grid Reference	Distance and Direction of View	Reason(s) for Selection and Sensitivity of Receptor
1	View from A466, south of the site.	352725, 192861	250m; North	Road users – low sensitivity
2	View from A48, south-west of site.	352399, 192875	150m; North-east	Road users, pedestrians – low sensitivity
3	View from A48, south of site.	352542, 193008	2m; North	Road users, pedestrians – medium sensitivity
4	View from A466, adjacent to eastern site boundary looking west.	352582, 193254	10m; West	Road users, pedestrians – low sensitivity
5	View from Mounton Road, at the northern site boundary.	352518, 193516	2m; South	Road users, pedestrians – low sensitivity
6	View from PRoW 373/68/1, west of Bayfield.	351561, 193425	400m; East	PRoW users (within AONB) – very high sensitivity
7	View from Minor Road (within National Landscape/AONB) west of Mounton.	350680, 193010	1.45km; East	Minor road users (within AONB) – high sensitivity



PVP No.	Location	Grid Reference	Distance and Direction of View	Reason(s) for Selection and Sensitivity of Receptor
8	View from PRoW 373/60/1, west of Chepstow Garden Centre.	350841, 191681	2km; North-east	PRoW users – high sensitivity
9	View from St Lawrence Lane.	352187, 193260	5m; North-east	Road users, pedestrians – medium sensitivity
10	View from Runstons Lane, near Willis Hill.	350732, 191899	1.95km; North-east	Minor road users – medium sensitivity
11	View from PRoW 373/2/1 within Mathern Conservation Area, south of the site.	352550, 192472	570m; North	PRoW users – very high sensitivity

### Future Baseline Conditions

- 5.3.66 The changes to temperature and precipitation predicted as a result of climate change will be likely, in time, to change the landscape around us in a number of ways. However, it is unlikely that the subtle changes would lead to wholesale change to the future landscape baseline within the lifetime of the Proposed Scheme. The Site baseline is currently poorly managed agricultural land.
- 5.3.67 Changes might include certain tree species or grasslands becoming more dominant/prevalent or particular species suffering from environmental factors such as disease including Dutch Elm disease and Ash dieback. However, given the character of the surrounding landscape, which contains mature trees and extensive hedgerow networks, these changes would likely not have a prominent impact.
- 5.3.68 The impact of climate change on the landscape and visual resource is assessed through the consideration of a potential future baseline scenario and considers how potential climate change may alter the predicted landscape and visual effects contained within this Chapter. Whilst it is unlikely that completely new direct impacts would arise as a result of climate change based on the current conditions, the geographic spread or scale of potential impacts might be changed when considered against the future baseline conditions.
- 5.3.69 For visual effects, the future baseline under a climate change scenario is not considered likely to lead to any greater, or notably different, effects to those predicted.

## 5.4 Mitigation Measures Adopted as Part of the Project

### Primary and Tertiary Mitigation Measures

- 5.4.1 A landscape-led design approach to any future scheme will play a key part in the development of an acceptable layout for a mixed-use scheme within this location. EDP has considered the key sensitivities which have inputted to shape the future scheme, based upon the landscape and visual matters identified within **Section 3** and **4** of **Technical Appendix 5.1**, to ensure that future development can sympathetically



integrate with its landscape context and provides an appropriate response from both a recreational and appearance perspective.

5.4.2 As described below, and in line with the 'Overall Landscape Strategy' section included within the LVB (**Technical Appendix 5.1**), primary mitigation has been considered as an integral part of the overall design strategy. There are no 'add-on' measures to ameliorate the significant environmental effects described below. This positive and pro-active approach means that mitigation has been assessed and considered at all stages of the Proposed Scheme to prevent or reduce the occurrence of environmental effects.

5.4.3 An understanding of the mitigation measures embedded in the Proposed Scheme is fundamental to an assessment of the potential landscape and visual effects. The design in terms of layout, built form height, orientation, and biodiversity enhancements has been informed by the Parameter Plans (Green Infrastructure and Land Use) at **Technical Appendix 2.1** and LVB (**Technical Appendix 5.1**) in order to mitigate potential impacts. A key principle of landscape assessment is that the assessment should take account of the effect of any proposed mitigation (GLVIA3, paragraph 6.45).

#### Construction Stage

5.4.4 The primary and tertiary mitigation, which has been evaluated as part of the construction stage assessment, is outlined below and should be included within a Construction and Environmental Management Plan (CEMP) via planning condition.

5.4.5 Phasing of development to reduce the prominence of construction works on the local skyline;

5.4.6 Lighting will be controlled through the implementation of best practice measures, informed by the Institution of Lighting Professionals (ILP) 'Guidance Note 1 for the reduction of obtrusive light', including the use of sufficient lighting units for the task in hand to avoid the need for tall, wide beam lighting units and the reduction of fixed lighting outside working hours;

5.4.7 Measures such as avoiding any artificial lighting, unless absolutely critical and the use of hoods, cowls and timers to restrict light spill only to where it is required and for as long as it is required; and

5.4.8 Construction activities (including the movement of site traffic, lighting and noise) will be carefully controlled by a conditioned CEMP, as part of the ES.

#### Operational Stage

5.4.9 The primary and tertiary mitigation, which has been evaluated as part of the operational stage assessment, is outlined below (the principles committed to are also shown on the Green Infrastructure Parameter Plan (**Appendix 2.1**) and Green Infrastructure/Landscape Strategy (**Appendix EDP 3 of Technical Appendix 5.1**)).

5.4.10 Development, focussed in the east of the Site, will contain tree lined streets, sustainable drainage features such as rain gardens and swales, as well as ornamental on-plot planting to stimulate seasonal interest. Specifically:

- Existing on-site and adjacent trees and scrub would be retained and enhanced, with new native planting to gap-up fragmented areas and further support existing habitats;
- Proposed hedgerow and tree planting to improve site biodiversity and localised habitat connectivity, providing enhanced connections (to both pedestrians and cyclists) to the wider Green Infrastructure (GI) network;
- Additional tree/shrub planting in the western areas of the Site, to further filter views from the National Landscape and the west;



- The proposed tree planting includes native species to increase species diversity throughout the development and particularly alongside the existing woodland belt to the west; and
- Proposed planting within the development would include pockets of ornamental shrub planting, gateway and arrival spaces to create an aesthetically pleasing urban environment to improve and contribute to the local landscape character within the Site and near the eastern travel corridor along the A466.

## 5.5 Assessment of Construction Effects

### Construction Stage – Landscape Character

#### Changes to Landscape Character of the Site

- 5.5.1 During construction, the principal effects as a result of the Proposed Scheme will be the transition of the Site from an agricultural landscape to a predominantly urban development, and prior to the maturation of mitigation planting. Activities that could cause landscape and visual effects include:
- Clearance of vegetation within the construction zone, where appropriate;
  - Earthworks and temporary storage of topsoil;
  - Removal of unwanted waste from the Site;
  - Erection of site hoarding and fencing around vegetation (tree protection scheme);
  - Erection of temporary structures within the main contractor's construction compound, plus materials stockpiling and lay-down areas;
  - Potential lighting of the works (particularly during winter months);
  - Erection of scaffold structures;
  - Movement of construction vehicles, including mobile cranes;
  - Partially completed built form;
  - Works associated with the implementation of the landscape scheme; and
  - Removal of temporary construction facilities.
- 5.5.2 Within the Site, construction activity will inevitably result in a very high magnitude of change on the existing nature of the agricultural fields, including the immediate context of the Site, as a discrete geographical unit of the wider landscape. The existing field boundary vegetation would be retained where possible, with the exception of access for internal road routes and those sections removed to accommodate the proposed new access points from existing road corridors (Wye Valley Link Road/A466). Given the presence of construction activities (including movement of site traffic, lighting, noise and sounds, and the gradual conversion of the Site from agricultural to residential), a noticeable adverse change upon the 'visual and sensory' dimension of the Site character is not surprising during the construction stage.





- 5.5.3 The sensitivity of the Site landscape character and context is considered to be medium. The magnitude of change is considered to be very high. Therefore, there is likely to be a direct, temporary, medium term, adverse effect which is considered to be Major and will extend for only the duration of the construction stage.

Secondary Mitigation or Enhancement

- 5.5.4 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.5 In the absence of secondary mitigation, the residual construction effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.6 This residual effect at the construction stage is considered to be **significant**.

**Changes to Landscape Character of Site's Immediate and Wider Context – Within Settlement**

- 5.5.7 Construction will result in a significant and unavoidable change to the Site's landscape character, with some effects extending slightly beyond the Site, particularly to the east. These include visibility of construction activities, lighting, noise, vibration, and material movement. Temporary lighting will be required, especially along the A466. Nearby residents and users of the National Cycle Route will be most affected by noise and visual impacts. While these effects will be short to medium in duration and mitigated through a construction management plan, the overall magnitude of change to the immediate landscape character within settlement (typically to the east) is assessed as high. This is elaborated on within **Technical Appendix 5.2**.

- 5.5.8 The sensitivity of the character area is considered to be low. The magnitude of change is considered to be high. Therefore, there is likely to be a direct, temporary, medium term, adverse effect which is considered to be **moderate** and will extend for only the duration of the construction stage.

Secondary Mitigation or Enhancement

- 5.5.9 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.10 In the absence of secondary mitigation, the residual construction effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.11 This residual effect at the construction stage is considered to be **significant**.

**Changes to Landscape Character of the Site's Immediate and Wider Context – Outside of Settlement and Outside of the Wye Valley National Landscape**

- 5.5.1 Due to topography, vegetation, and built form around Bayfield and Bennett's Farm, visual connections between the Site and the surrounding NL are extremely limited. The Site is only faintly visible in distant uphill views, with built development intentionally avoided in the Site's more sensitive western area. As a result, any construction impacts in this area will be indirect—primarily limited to potential noise effects. Given the limited visibility and screening by landform and vegetation, the magnitude of change to this character area during construction is assessed as very low. This is elaborated on within **Technical Appendix 5.2**.

- 5.5.2 The sensitivity of the character area is considered to be high. The magnitude of change is considered to be very low. Therefore, there is likely to be a direct, temporary, medium term, adverse effect which is considered to be **moderate/minor** and will extend for only the duration of the construction stage.



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#### Secondary Mitigation or Enhancement

5.5.3 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.5.5 In the absence of secondary mitigation, the residual construction effect upon the character area is the same as that reported in the pre-mitigation scenario.

#### Significance

This residual effect at the construction stage is considered to be **not significant**.

### **Changes to Landscape Character of Site's Immediate and Wider Context – Outside of Settlement and Within the Wye Valley National Landscape**

5.5.7 In the south and south-west, construction effects on landscape character are expected to be limited, primarily involving perceptual impacts such as noise rather than visual intrusion, due to an existing tree belt. Filtered views of construction may be possible, with changes experienced from the A48 corridor. With few nearby residences and predominantly agricultural surroundings, and with mitigation through a construction management plan, the magnitude of change to the landscape character in this area during construction is assessed as low. This is elaborated on within **Technical Appendix 5.2**.

5.5.8 The sensitivity of the character area is considered to be medium. The magnitude of change is low. Therefore, there is likely to be a direct, temporary, medium term, adverse effect which is considered to be **moderate/minor** and will extend for only the duration of the construction stage.

#### Secondary Mitigation or Enhancement

5.5.9 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.5.10 In the absence of secondary mitigation, the residual construction effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

#### Significance

5.5.11 This residual effect at the construction stage is considered to be **not significant**.

### **Changes to the Overall Landscape Character of the Wye Valley National Landscape**

5.5.12 Intervisibility between the Site and the Wye Valley NL has been assessed, with representative views provided in **Photoviewpoints EDP 6 and 7 (Appendix EDP 2 of Technical Appendix 5.1)**. **Photoviewpoint EDP 6**, taken from footpath 373/68/1 on the boundary of the designation, illustrates the typical visual relationship. As outlined in the baseline, the western landscape sits at a lower elevation than the Site, and views towards Chepstow from this location commonly feature dispersed built form and other visual detractors. The foreground of the view is dominated by agricultural land.

5.5.13 When assessing the impact on the character of the overall NL, which extends c. 90km northwards from Chepstow, the potential change must be contextualised. Given the overall size and character of the NL relative to the Site, the proposed scheme is expected to result in only a minimal level of change.

5.5.14 During construction, effects on the wider character of the NL are expected to be limited and indirect. Owing to the restricted visual connection between the Site and the designation, impacts are likely to be perceptual in nature—principally through occasional noise. **Photoviewpoint EDP 6** illustrates the limited visibility from within the NL, and existing landform and vegetation are expected to mitigate any potential influence on landscape character.



- 5.5.15 The sensitivity of this character area is considered to be very high. The magnitude of change for the construction stage is negligible. Therefore, there is likely to be an indirect, temporary, short-medium term, adverse effect which is **negligible**.

Secondary Mitigation or Enhancement

- 5.5.16 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.17 In the absence of secondary mitigation, the residual construction effect upon the NL character is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.18 The residual effects at the construction stage are considered to be **not significant**.

**Construction Stage Changes to Views/Visual Amenity**

- 5.5.19 A summary of Visual Amenity receptors and construction effects is provided below at **Table 5.13**. For those effects which are Significant, these are explained further below the table. For further analysis of Not Significant Effects, see **Technical Appendix 5.2**.

**Table 5.13: Summary of Visual Amenity Receptors and Construction Effects**

PVP No.	Location	Distance and Direction of View	Receptor Location	Construction Level of Effect
Not Significant Effect				
Significant Effect				
<b>Public Rights of Way (PRoW)</b>				
6	View from PRoW 373/68/1, west of Bayfield	c.400m, east	PRoW 373/68/1	Moderate/-Minor
11	View from PRoW 373/2/1 within Mathern Conservation Area, south of the site	c.570m, north	PRoW 373/2/1	Moderate/-Minor
8	View from PRoW 373/60/1, west of Chepstow Garden Centre	c.2km, north-east	PRoW 373/60/1	Moderate/-Minor
<b>Road Users – Major Roads</b>				
3	View from A48, south of the site	c.2m, north	A48	Major/-Moderate
2	View from A48, south-west of the site	c.150m, north-east	A48	Minor
4	View from A466, adjacent to eastern site boundary looking west.	c.10m, west	Wye Valley Link Road/A466	Major/-Moderate
1	View from A466, south of the site.	c.250m, north	Wye Valley Link Road/A466	Minor/-Negligible



PVP No.	Location	Distance and Direction of View	Receptor Location	Construction Level of Effect
<b>Road Users – Minor Roads</b>				
5	View from Mounton Road, at the northern site boundary	c.2m, south	Mounton Road	Major/-Moderate
9	View from St Lawrence Lane	c.5m, north-east	St. Lawrence Lane	Moderate
7	View from Minor road (within National Landscape/AONB) west of Mounton	c.1.45km, east	Minor Road within NL	Moderate/-Minor
10	View from Runstons Lane, near Willis Hill.	c.1.95km, north-east	Runstons Lane	Minor
<b>Receptors within Wye Valley National Landscape</b>				
6	View from PRoW 373/68/1, west of Bayfield	c.400m, east	PRoW 373/68/1	Moderate/-Minor
7	View from Minor road (within National Landscape/AONB) west of Mounton	c.1.45km, east	Minor Road within NL	Moderate/-Minor
<b>Receptors Using National Cycle Route</b>				
4	View from A466, adjacent to eastern site boundary looking west.	c.10m, west	Wye Valley Link Road/A466	Major/-Moderate
5	View from Mounton Road, at the northern site boundary	c.2m, south	Mounton Road	Major/-Moderate

### Public Right of Way Users

- 5.5.20 It is not likely that construction work at the Site would have a large bearing on the assessed PRoW's. Some of the taller elements required for construction may be visible however even if this is the case, they will form small parts of the existing views along these routes.
- 5.5.21 The sensitivity of the local PRoW users is considered to be high. The magnitude of change is considered to be very low. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **moderate/minor** at worst case for users of footpaths 373/68/1, 373/2/1 and 373/60/1.

### Secondary Mitigation or Enhancement

- 5.5.22 No secondary mitigation or enhancement has been identified.

### Residual Effect

- 5.5.23 In the absence of secondary mitigation, the residual construction effect upon PRoW users is the same as that reported in the pre-mitigation scenario.

### Significance

- 5.5.24 This residual effect at the construction stage is considered to be **not significant**.



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### Road Users – Major Roads

5.5.25 The viewpoints identify that major roads are significantly impacted when in close proximity to the Site. Given that the A48 and A466/Wye Valley Link Road align two of the Site's boundaries, construction activity on site, whether obstructed by construction hoarding or not will result in a large change in views for this receptor group.

5.5.1 The sensitivity of the local major road networks when close to the Site, being typically fast routes where the users are focussed on the path ahead in what is a transitional experience, is low. When assessing the receptor group as a whole, the magnitude of change is contextualised and assessed across the entire length of the routes, rather than at a single point adjacent to the Site (as assessed within **Table 5.13** and **Technical Appendix 5.2**). The magnitude of change is therefore adjusted to low. Therefore, at the construction stage, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **minor**.

#### Secondary Mitigation or Enhancement

5.5.2 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.5.3 In the absence of secondary mitigation, the residual construction effect upon major road users is the same as that reported in the pre-mitigation scenario.

#### Significance

5.5.4 This residual effect at the construction stage is considered to be **not significant**.

### Road Users - Minor Roads

5.5.5 Availability of views of the proposed scheme for this receptor group are largely limited by intervening vegetation and topography. On the whole, it is considered that only receptors within very close proximity of the Site will experience a large change to their baseline state. Whilst considering where changes of views are available, the duration in which they are experienced is equally as important. All effects identified, when assessing the overall receptor group, should contextualise and acknowledge the duration of which visibility of the Site is achievable. With regards to minor roads, the photoviewpoints identified within the table above assess the views as standalone views. The overall changes anticipated on the users of minor roads is assessed below.

5.5.6 The sensitivity of the local minor road network is medium. The magnitude of change is considered to be very low on the whole. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **minor**.

#### Secondary Mitigation or Enhancement

5.5.7 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.5.8 In the absence of secondary mitigation, the residual construction effect upon minor road users is the same as that reported in the pre-mitigation scenario.

#### Significance

5.5.9 This residual effect at the construction stage is considered to be **not significant**.



### Receptors within Wye Valley National Landscape

- 5.5.10 Intervisibility between the Site and the NL has been assessed, with example views included as **Photoviewpoints EDP 6 and 7** in **Appendix EDP 2 of Technical Appendix 5.1. Photoviewpoint EDP 6**, taken from footpath 373/68/1, is located on the boundary of the NL designation. As outlined in the baseline assessment, the landscape to the west generally lies at a lower elevation than the Site. Views toward Chepstow from this location often include sprawling-built form and other visual detractors, with agricultural land occupying the foreground in **Photoviewpoint EDP 6**. Where views of the Site during construction are possible, these are likely to be limited to taller elements such as cranes. Due to the viewing distance, such elements would appear as small components within the overall view.
- 5.5.11 The sensitivity of the receptors within the National Landscape is high. The magnitude of change is considered to be very low overall. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **moderate/minor**.

#### Secondary Mitigation or Enhancement

- 5.5.12 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.5.13 In the absence of secondary mitigation, the residual construction effect upon people within the Wye Valley NL is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.5.14 This residual effect at the construction stage is considered to be **not significant**.

### Receptors using the National Cycle Network 42

- 5.5.15 The National Cycle Network can be seen on **Figure 5.3** within **Technical Appendix 5.1**. The route closely follows the Site on its eastern side from the Highbeech Roundabout, before heading west along Mouton Road. This receptor group will experience a large change for a short duration of the route. As it reaches Mouton Road, the Site then falls out of sight. The proposals, offer an improvement to the existing route, heading along Mouton Road, which is currently shared with cars. An alternative option, through the development and open space, provides a beneficial alternative route for its users.
- 5.5.16 The sensitivity of the cycle network users, when adjacent to a busy main road, is low. The magnitude of change when contextualised to the overall length of this section of cycleway, is low. Therefore, there is likely to be an indirect, temporary, medium term, beneficial effect on this receptor group, which is considered to be **minor**.

#### Secondary Mitigation or Enhancement

- 5.5.17 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.5.18 In the absence of secondary mitigation, the residual construction effect upon National Cycle Network 42 users adjacent to the Site is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.5.19 This residual effect at the construction stage is considered to be **not significant**.

### Residential Properties along the A466 and St Lawrence Road

- 5.5.1 There are approximately 16 properties included within this receptor group, all found around 20 metres from the Site. As with users of the A466, residents here will experience a marked alteration to their immediate surroundings, with views changing significantly from the existing landscape. The baseline



assessment notes the visual disruption currently caused by the high traffic volume and speed along the A466, which diminishes visual amenity. The introduction of residential development adjacent to the highway is likely to alter this dynamic—both physically and perceptually—by reducing traffic speeds through design measures and calming interventions, potentially enhancing the sense of tranquillity experienced by residents. Despite this potential benefit, the scale and proximity of the change will be clearly noticeable to these receptors.

- 5.5.2 The sensitivity of this residential receptor group is medium. The magnitude of change is high. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **major/moderate**.

Secondary Mitigation or Enhancement

- 5.5.3 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.4 In the absence of secondary mitigation, the residual construction effect upon this receptor group is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.5 This residual effect at the construction stage is considered to be **significant**.

**Residential Properties along Mounton Road**

- 5.5.6 This receptor group, which includes St. Lawrence House, has been described in the baseline assessment (**Technical Appendix 5.1**). In several locations—particularly from upper floor windows—residents will have clear and uninterrupted views of the proposed development, including new areas of open space and built form. These views represent a noticeable change from the current landscape. Given the elevated position of some properties and the openness of the Site in this direction, the proposed development will form a prominent new feature in the outlook from these dwellings.

- 5.5.7 The sensitivity of this residential receptor group is high. The magnitude of change is also high. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **major**.

Secondary Mitigation or Enhancement

- 5.5.8 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.9 In the absence of secondary mitigation, the residual construction effect upon effect upon this receptor group is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.10 This residual effect at the construction stage is considered to be **significant**.

**Residential Properties at Bayfield**

- 5.5.11 This group of mid-20<sup>th</sup> century housing is anticipated to experience only minor changes to their existing views as a result of the development. Any visibility will primarily be from upper-floor windows of the most southerly properties, which are separated from the Site by Mounton Road. At ground level, visibility will be largely obscured by a substantial stone wall, intervening vegetation, and neighbouring buildings. As a result, the visual influence of the proposed development on this receptor group will be limited in both extent and prominence.



- 5.5.12 The sensitivity of this residential receptor group is medium. The magnitude of change is low. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **moderate/minor**.

Secondary Mitigation or Enhancement

- 5.5.13 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.5.14 In the absence of secondary mitigation, the residual construction effect upon effect upon this receptor group is the same as that reported in the pre-mitigation scenario.

Significance

- 5.5.15 This residual effect at the construction stage is considered to be **not significant**.

## 5.6 Assessment of Operational Effects

### Operational Stage – Landscape Character

- 5.6.1 A detailed assessment and description of operational change is contained within **Technical Appendix 5.2**.

#### Changes to Landscape Character of the Site

- 5.6.2 By Year 1, the Proposed Scheme will have transformed the Site from agricultural land into a mixed-use development, including housing, a mobility hub, a hotel, and a care home, with associated open space and infrastructure. While elements of the original landscape, such as hedgerows and green corridors, are retained to maintain links with the Site's context, the overall character will undergo a fundamental shift. Although boundary vegetation provides some visual relief, the lack of fully established mitigation planting means the change in character will be clearly perceived locally, though its impact will lessen with distance.

- 5.6.3 By Year 15, the development will be fully established, with mature mitigation planting softening its appearance and improving integration with the surrounding landscape. Enhanced green infrastructure and habitat creation will provide ecological and climate resilience benefits. While these factors reduce the visual and perceptual impact, the transformation from greenfield to residential use will still result in a medium magnitude of change. The scale of the development will be contextualised further by mature vegetation.

- 5.6.4 The sensitivity of the Site landscape character is considered to be medium. The magnitude of change for Year 1 is considered to be **high**, reducing to **medium** at Year 15. Therefore, there is likely to be a direct, temporary, medium to long term, adverse effect which is considered to be **major/moderate** at Year 1, and a direct, permanent, long term, adverse effect which is considered to be **moderate** at Year 15.

Secondary Mitigation or Enhancement

- 5.6.5 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.6.6 In the absence of secondary mitigation, the residual operation effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

Significance

- 5.6.7 This residual effect at Year 1 is considered to be **significant**. By year 15, this effect is **not significant** in EIA terms, when scale and beneficial landscape characteristics, inherent within the proposals, have been considered at maturity.





### Changes to Landscape Character of Site's Immediate and Wider Context – Within Settlement

- 5.6.8 By Year 1, the eastern edge of the Site will have undergone a notable transformation in line with the Parameter Plans. Existing derelict fencing and sloping grass banks will be replaced by active frontages facing the A466 and a new pedestrian route, with a prominent arrival space introduced where Mounton Road meets the A466. These changes will be the most pronounced from within the existing settlement and will alter the character experienced from adjacent roads and cycleways. While the overall change will be clearly felt in the immediate vicinity, its influence will lessen with increasing distance from the Site. The resulting magnitude of change to local landscape character is assessed as **medium** at a localised level.
- 5.6.9 By Year 15, both direct and indirect effects of the development will be further reduced through the establishment of new landscape features. Mitigation planting, particularly within the central areas of the scheme and the western public open space, will help soften the appearance of the built form and enhance integration with the wider landscape. However, these areas are less visually prominent from the eastern side, where most receptors are located. Tree planting along the A466 will contribute to reducing the visual impact from this direction, but the extent of visible change will still be sufficient to maintain a **medium** magnitude of change overall.
- 5.6.10 The sensitivity of this character area is considered to be low. The magnitude of change for Year 1 is medium, which is maintained at Year 15. Therefore, there is likely to be a direct, permanent, medium to long term, adverse effect which is considered to be **moderate/minor** at Year 1 and 15.

#### Secondary Mitigation or Enhancement

- 5.6.11 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.6.12 In the absence of secondary mitigation, the residual operation effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.6.13 This residual effects at both Year 1 and Year 15 are considered to be **not significant**.

### Changes to Landscape Character of Site's Immediate and Wider Context – Outside of Settlement and Outside of the Wye Valley National Landscape

- 5.6.14 At Year 1, the level of change experienced in the landscape immediately outside the settlement and the NL—particularly to the west and south-west—will remain minimal, similar to that during the construction phase. These areas sit at a lower elevation and are largely screened by a substantial tree belt along the Site's western boundary, which averages around 20 metres in depth. As a result, any views of the development will be heavily filtered, even in winter. The most noticeable influence is likely to be background noise from the Site, though this will be largely masked by existing road traffic from the surrounding network.
- 5.6.15 By Year 15, the combined effects of the development will be further diminished through the successful establishment of mitigation planting and enhanced landscape features. In particular, new green infrastructure within the central areas and the western public open space will contribute to softening the appearance of the built form and improving integration with the surrounding landscape. These improvements will lessen the visibility and perceptual impact of the development, especially from the west and south-west.
- 5.6.1 The sensitivity of this character area is considered to be medium. The magnitude of change for Year 1 is low, which is further reduced at Year 15, to very low. Therefore, there is likely to be a direct, temporary, medium to long term, adverse effect which is considered to be **moderate/minor** at Year 1, and a direct, permanent, long term, adverse effect which is considered to be **minor** at Year 15.



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Secondary Mitigation or Enhancement

- 5.6.2 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.6.3 In the absence of secondary mitigation, the residual operation effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

Significance

- 5.6.4 This residual effects at both Year 1 and Year 15 are considered to be **not significant**.

**Changes to Landscape Character of Site's Immediate and Wider Context – Outside of Settlement and Within the Wye Valley National Landscape**

- 5.6.5 In the short term, the character of the landscape outside the settlement and within the Wye Valley NL is expected to experience minimal change. This is largely due to limited intervisibility, existing screening, and the careful design of the proposals, which avoid development within the most visually sensitive western part of the Site. By Year 1, early-stage mitigation planting will also be in place, further reducing the potential for noticeable views into the Site.

- 5.6.6 By Year 15, the limited indirect effects on this character area will be further reduced through the establishment of mature planting and enhanced landscape features. The mitigation planting—particularly within the central areas of the development and the western public open space—will help to soften the visual presence of the scheme, especially from western viewpoints. As previously noted, views from this part of the landscape are already restricted, and the maturing of on-site vegetation will provide an additional layer of screening.

- 5.6.7 The sensitivity of this character area is considered to be high. The magnitude of change for Year 1 is very low, which remains at Year 15. Therefore, there is likely to be a direct, temporary, medium to long term, adverse effect which is **moderate/minor** at Year 1, and a similar but permanent effect at Year 15.

Secondary Mitigation or Enhancement

- 5.6.8 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.6.9 In the absence of secondary mitigation, the residual operation effect upon the Site character and context is the same as that reported in the pre-mitigation scenario.

Significance

- 5.6.10 This residual effects at both Year 1 and Year 15 are considered to be **not significant**.

**Changes to the Overall Landscape Character of the Wye Valley National Landscape**

- 5.6.11 Intervisibility between the Site and the Wye Valley NL has been reviewed for the operational phase, with example views presented in **Photoviewpoints EDP 6 and 7 (Appendix EDP 2 of Technical Appendix 5.1)**. **Photoviewpoint EDP 6**, taken from footpath 373/68/1 along the boundary of the designation, demonstrates the limited visual connection. As noted in the baseline, the topography places the western landscape at a lower elevation than the Site, and existing views toward Chepstow frequently include scattered built development and other detracting elements. Agricultural land continues to dominate the foreground.

- 5.6.12 In considering the operational effects on the wider character of the NL—which extends over a substantial area north from Chepstow—it is important to recognise the relative scale of the proposed development. Given the limited extent of visibility and the vast and varied nature of the NL as a whole, the contribution of the development to any perceived change is considered negligible.



5.6.13 During the operational phase, any remaining effects are anticipated to be minimal and indirect. Where the Site is perceptible from within the NL, such views will be extremely limited and filtered by existing vegetation and landform. As a result, the completed development is not expected to noticeably influence the character of the designation.

5.6.14 The sensitivity of this character area is considered to be very high. The magnitude of change for the operational stage is negligible. Therefore, there is likely to be an indirect, permanent, long term, adverse effect which is **negligible**.

#### Secondary Mitigation or Enhancement

5.6.15 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.6.16 In the absence of secondary mitigation, the residual operational effect upon the NL character is the same as that reported in the pre-mitigation scenario.

#### Significance

5.6.17 The residual effects at the operational stage are considered to be **not significant**.

#### **Operation Stage Changes to Views/Visual Amenity**

5.6.18 A summary of Visual Amenity receptors and operational effects is provided below at **Table 5.14**. Further discussion of these effects, in particular significant ones, are explained further below the table. For detailed analysis of effects on individual representative views, see **Technical Appendix 5.2**.

**Table 5.14: Summary of Visual Amenity Receptors and Operational Effects**

PVP No.	Location	Distance and Direction of View	Receptor Location	Level of Effect: Year 1	Level of Effect: Year 15
Not Significant Effect					
Significant Effect					
<b>Public Rights of Way (PRoW)</b>					
6	View from PRoW 373/68/1, west of Bayfield	c.400m, east	PRoW 373/68/1	Moderate/-Minor	Moderate/-Minor
11	View from PRoW 373/2/1 within Mathern Conservation Area, south of the site	c.570m, north	PRoW 373/2/1	No Effect.	No Effect.
8	View from PRoW 373/60/1, west of Chepstow Garden Centre	c.2km, north-east	PRoW 373/60/1	No Effect.	No Effect.
<b>Road Users – Major Roads</b>					
3	View from A48, south of the site	c.2m, north	A48	Moderate	Moderate/-Minor



PVP No.	Location	Distance and Direction of View	Receptor Location	Level of Effect: Year 1	Level of Effect: Year 15
2	View from A48, south-west of the site	c.150m, north-east	A48	Minor/-Negligible	Minor/-Negligible
4	View from A466, adjacent to eastern site boundary looking west.	c.10m, west	Wye Valley Link Road/A466	Major/-Moderate	Moderate
1	View from A466, south of the site.	c.250m, north	Wye Valley Link Road/A466	Minor/-Negligible	Minor/-Negligible
<b>Road Users – Minor Roads</b>					
5	View from Mounton Road, at the northern site boundary	c.2m, south	Mounton Road	Major/-Moderate	Moderate
9	View from St Lawrence Lane	c.5m, north-east	St. Lawrence Lane	Moderate	Moderate/-Minor
7	View from Minor road (within National Landscape/AONB) west of Mounton	c.1.45km, east	Minor Road within NL	Moderate/-Minor	Moderate/-Minor
10	View from Runstons Lane, near Willis Hill.	c.1.95km, north-east	Runstons Lane	No Effect	No Effect
<b>Receptors within Wye Valley National Landscape</b>					
6	View from PRoW 373/68/1, west of Bayfield	c.400m, east	PRoW 373/68/1	Moderate/-Minor	Moderate/-Minor
7	View from Minor road (within National Landscape/AONB) west of Mounton	c.1.45km, east	Minor Road within NL	Moderate/-Minor	Moderate/-Minor
<b>Receptors Using National Cycle Route</b>					
4	View from A466, adjacent to eastern site boundary looking west.	c.10m, west	Wye Valley Link Road/A466	Major/-Moderate	Moderate
5	View from Mounton Road, at the northern site boundary	c.2m, south	Mounton Road	Major/-Moderate	Moderate



### Public Right of Way Users

- 5.6.19 The operational phase of the development is not expected to significantly affect the assessed PRow. As outlined in **Technical Appendix 5.2**, receptors along these routes are anticipated to experience a miniscule change in their baseline state. Additionally, when assessing the overall receptor group and considering the transitional nature of people using the footpaths, the availability of views is even further reduced from the individual points upon footpaths assessed within **Technical Appendix 5.2**. Where the development is visible, it will appear as a minor component within the wider existing views.
- 5.6.20 The sensitivity of the local PRow users is considered to be high. The magnitude of change is considered to be very low. This yields an indirect, temporary, medium term, adverse effect which is considered to be **moderate/minor** at worst case for users of footpaths 373/68/1, 373/2/1 and 373/60/1. This is the case for both Year 1 and Year 15.

#### Secondary Mitigation or Enhancement

- 5.6.21 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.6.22 In the absence of secondary mitigation, the residual operational effect upon PRow users adjacent to the Site is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.6.23 This residual effect at the operational stage is considered to be **not significant**.

### Road Users – Major Roads

- 5.6.24 The viewpoints indicate that major roads in close proximity to the Site—namely the A48 and A466/Wye Valley Link Road—will continue to experience noticeable changes during the operational phase. As these routes align two of the Site's boundaries, the completed development will introduce a permanent and visible change to the immediate roadside views. While boundary planting and built form design will contribute to softening the visual impact over time, the proximity and openness of these routes mean that the development will remain a prominent feature within the visual experience of this receptor group.
- 5.6.25 The sensitivity of the local major road networks when close to the Site, being typically fast routes where the users are focussed on the path ahead in what is a transitional experience, is low. When assessing the receptor group as a whole, the magnitude of change is contextualised and assessed across the entire length of the routes, rather than at a single point adjacent to the Site (as assessed within **Table 5.14** and **Technical Appendix 5.2**). The magnitude of change is therefore adjusted to low. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **minor**. At Year 15, the magnitude of change is reduced to very low, resulting in an indirect, permanent, long term adverse effect, considered to be **minor/negligible**.

#### Secondary Mitigation or Enhancement

- 5.6.26 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.6.27 In the absence of secondary mitigation, the residual operational effect upon major road users adjacent to the Site is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.6.28 This residual effect at the operational stage is considered to be **not significant**.



### Road Users - Minor Roads

5.6.29 During the operational phase, views of the proposed development from this receptor group—users of minor roads—are generally constrained by existing vegetation and topography. Significant visual change is likely to occur only for those travelling in close proximity to the Site. However, it is important to consider not only where views are available, but also the duration for which they are experienced. For road users, visibility of the development is often brief and intermittent, further limiting the perceptual impact. While photoviewpoints presented above illustrate individual view scenarios, the assessment of the receptor group as a whole takes into account the transient nature of movement along minor roads. A summary of anticipated changes for this group is provided below.

5.6.30 The sensitivity of the local minor road network is medium. The magnitude of change is considered to be very low overall. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **minor** for Year 1. This will be the same effect, but permanent in Year 15.

#### Secondary Mitigation or Enhancement

5.6.31 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.6.32 In the absence of secondary mitigation, the residual operational effect upon effect upon this receptor group is the same as that reported in the pre-mitigation scenario.

#### Significance

5.6.33 This residual effect at the operational stage is considered to be **not significant**.

### Receptors within Wye Valley National Landscape

5.6.34 Intervisibility between the Site and the Wye Valley NL has been assessed, with representative views presented in **Photoviewpoints EDP 6 and 7**, included in **Appendix EDP 2 of Technical Appendix 5.1**. **Photoviewpoint EDP 6**, located on footpath 373/68/1 at the edge of the NL designation, illustrates the typical visual context. As identified in the baseline, the landscape to the west generally sits at a lower elevation than the Site, and views towards Chepstow from this location often feature built form and visual detractors, with agricultural land in the foreground. During the operational phase, visibility of the completed development is expected to be very limited. Where any built elements are perceptible, they would appear as minute components in the wider view, largely filtered by distance, topography, and intervening vegetation.

5.6.35 The sensitivity of the receptors within the National Landscape is high. The magnitude of change is considered to be very low overall. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect which is considered to be **moderate/minor** for Year 1. Year 15 will feature the same effect but will be permanent in nature.

#### Secondary Mitigation or Enhancement

5.6.36 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.6.37 In the absence of secondary mitigation, the residual operational effect on visual amenity, is the same as that reported in the pre-mitigation scenario.

#### Significance

5.6.38 This residual effect at the operational stage is considered to be **not significant**.



### Receptors using the National Cycle Network 42

5.6.39 The alignment of the National Cycle Network is shown in **Figure 5.3 of Technical Appendix 5.1**. The route runs along the eastern edge of the Site near the Highbeech Roundabout, before turning west onto Mounton Road. Cyclists and pedestrians using this section will experience a noticeable change in views along a short stretch where the development is in close proximity. However, once the route continues along Mounton Road, the Site quickly moves out of view. The proposals also offer an enhancement to the existing experience—currently shared with vehicle traffic—by introducing a new route through the development and adjacent open space, providing a safer and more pleasant and safe alternative for users of the National Cycle Network.

5.6.40 The sensitivity of the cycle network users, when adjacent to a busy main road, is low. The magnitude of change when contextualised to the overall length of this section of cycleway, is low. Therefore, there is likely to be an indirect, temporary, medium term, beneficial effect on this receptor group, which is considered to be **minor** for Year 1. At Year 15, the effect remains **minor**, however it becomes permanent and long term.

#### Secondary Mitigation or Enhancement

5.6.41 No secondary mitigation or enhancement has been identified.

#### Residual Effect

5.6.42 In the absence of secondary mitigation, the residual operational effect upon cycle users along National Cycle Network route 42 is the same as that reported in the pre-mitigation scenario.

#### Significance

5.6.43 This residual effect at the operational stage is considered to be **not significant**.

### Residential Properties along the A466 and St Lawrence Road

5.6.44 As previously noted in the construction stage assessment, these c.16 residential properties lie approximately 20 metres from the Site boundary. During the operational phase, residents—like users of the adjacent A466—will experience a noticeable shift in their immediate setting, with views transitioning from an open landscape to a residential frontage. The baseline identifies existing visual disruption caused by high traffic volumes and speeds along the A466, which currently detracts from residential amenity. The proposed development, through its proximity and design—including potential traffic calming measures—may help moderate vehicle speeds, offering a degree of perceptual improvement in tranquillity. The receptor group also forms only part of the wider settlement, who on the whole will remain mostly unaffected by the development in a visual sense. Nevertheless, due to the closeness and scale of the development, the visual change will remain prominent for this cluster of dwellings.

5.6.45 The sensitivity of this residential receptor group is medium. The magnitude of change is high. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **major/moderate** for Year 1. The effect will reduce to **moderate**, permanent, long term and adverse for Year 15, following a reduction in magnitude of change to medium, once tree and shrub planting mature.



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Secondary Mitigation or Enhancement

- 5.6.46 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.6.47 In the absence of secondary mitigation, the residual operational effect upon this residential receptor group, adjacent to the Site is the same as that reported in the pre-mitigation scenario.

Significance

- 5.6.48 This residual effect at the operational stage for Year 1 is considered to be **significant**. By Year 15, the overall effect is considered to be **not significant** in the context of EIA, given the developed integration of the proposals into the landscape, and that residential views are not protected by the planning system.

**Residential Properties along Mounon Road**

- 5.6.49 This receptor group, which includes St. Lawrence House, is described in the baseline assessment (**Technical Appendix 5.1**). During the operational phase, residents—particularly those in properties with upper-floor views—will have clear sightlines towards the proposed development, including areas of public open space and built form. These views will represent a distinct and noticeable departure from the existing landscape. Owing to the elevated position of some dwellings and the open character of the Site in this direction, the development will become a prominent and permanent component of their visual outlook.

- 5.6.50 The sensitivity of this residential receptor group is high. The magnitude of change is high. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **major** for Year 1. The effect will reduce to **major/moderate**, permanent, long term and adverse for Year 15, following a reduction in magnitude of change to medium, mitigation measures have established and reach maturity.

Secondary Mitigation or Enhancement

- 5.6.51 No secondary mitigation or enhancement has been identified.

Residual Effect

- 5.6.52 In the absence of secondary mitigation, the residual operational effect upon this residential receptor group, adjacent to the Site is the same as that reported in the pre-mitigation scenario.

Significance

- 5.6.54 This residual effect at the operational stage for Year 1 is deemed **significant** with the absence of matured vegetation to further integrate the proposals into the landscape. The level of effect is driven by the sensitivity of receptors and the magnitude of change which they experience. In the instance of Year 15, the residential receptor is considered of high sensitivity (in line with guidance provided within GLVIA3) and the magnitude of change experienced is medium. This results in a moderate/major level of effect and this would suggest a significant effect on the basis of EDP methodology. However, such effects are commonplace in the context of greenfield development, where sites abut existing homes. Given that these tend to be some of the most sustainable and appropriate locations for new homes, these effects are considered to be **not significant** in the context of EIA (or else every greenfield development in such a location would require EIA). Views from private residences are not protected in the planning system for the same reason.
- 5.6.55 Furthermore, in this instance it is noteworthy that the scheme has avoided a potentially greater level of effect on these properties through the disposition of built form away from their immediate boundaries (allowing for the potential for retained views to the estuary to the south), the positioning of open space to the immediate east and expansion of the woodland area to the immediate west. Overall, the scheme has





responded positively and appropriately to these sensitive neighbouring receptors and this contributes to the finding that the effect is **not significant**.

#### **Residential Properties at Bayfield**

- 5.6.56 This group of mid-20<sup>th</sup> century properties is expected to experience only limited visual change as a result of the proposed development. Where views are available, they will predominantly be from upper-storey windows of the most southerly homes, which are set back behind Mounton Road. At ground level, views will be largely screened by existing features, including a substantial stone boundary wall, established vegetation, and intervening buildings. Consequently, the proposed development will have a minimal visual presence for this receptor group, both in terms of extent and overall prominence.
- 5.6.57 The sensitivity of this residential receptor group is medium. The magnitude of change is low at Year 1. Therefore, there is likely to be an indirect, temporary, medium term, adverse effect on this receptor group, which is considered to be **moderate/minor** for Year 1. The effect will reduce to **minor**, permanent, long term and adverse for Year 15, following a reduction in magnitude of change to very low, mitigation measures have established and reach maturity.

#### Secondary Mitigation or Enhancement

- 5.6.58 No secondary mitigation or enhancement has been identified.

#### Residual Effect

- 5.6.59 In the absence of secondary mitigation, the residual operational effect upon this residential receptor group, adjacent to the Site is the same as that reported in the pre-mitigation scenario.

#### Significance

- 5.6.60 This residual effect at the operational stage for both Year 1 and 15 is considered to be **not significant**.

### **Limitations and Assumptions**

- 5.6.61 To ensure transparency within the EIA process, the following limitations and assumptions have been identified.
- Baseline conditions have been established using published documents and field assessment by qualified Chartered Landscape Architects; it is important to note that this information may change before, or during, the construction and operation of the Proposed Scheme, but is considered to be representative of the Site conditions on which to base the assessment;
  - The assessment is undertaken in consideration of the 'worst case' scenario for the Proposed Scheme, i.e. those potential outcomes, situations or locations which would result in the most profound effect on landscape and visual receptors, unless stated to the contrary. It therefore identifies the greatest degree of change likely to accrue and may be subject to mitigating factors or alternative conditions which might reduce those effects. For example, the level of visual effect is expressed for winter landscape conditions when trees are bare of leaf cover and the visibility of development is at its greatest. Where this is the case, the assessment identifies alternative conditions or further mitigation which might result in impacts being less pronounced;
  - As defined above, the assessment of likely significant effects applies a pre-determined methodology to arrive at its conclusions. This procedure brings a degree of objective, procedural rigour into what otherwise might be judged to be 'personal opinion'. Certainly, professional judgement still plays its



part, but the purpose of adopting a methodology is to make the process as clear and logical as possible; and

- The LVIA considers an outline scheme of the Proposed Scheme, and the maximum parameters (as a worst-case) that are submitted with the planning application shown on the Parameter Plans (**Appendix 2.1**)

## 5.7 Assessment of Cumulative Effects

- 5.7.1 Appropriate consideration has been given to the sites and projects in the surrounding area which could potentially give rise to cumulative effects in combination with the Proposed Scheme and assessment made of the potential nature and significance of any cumulative effects arising in terms of landscape character and visual amenity.
- 5.7.2 Having undertaken that process, it is concluded that there would be no cumulative or in-combination effects in terms of those receptors assessed as being potentially affected by the Proposed Scheme and the sites in the Proposed Scheme's surroundings identified for cumulative assessment. This conclusion is applicable to both the 'construction' phase and 'operational' phase of the Proposed Scheme and so as a result no additional mitigation measures are either necessary or proposed.

## 5.8 Inter-relationships

- 5.8.1 There are considered to be potential inter-relationships between the assessment of effects on landscape character and visual amenity in this chapter, and those identified in relation to ecology (Chapter 4) and cultural heritage (Chapter 6).
- 5.8.2 These inter-relationships primarily relate to the design, implementation, and long-term management of public open space (POS) and landscape treatments around the perimeter of the Proposed Scheme—particularly in the north-western corner of the Site and areas near St. Lawrence House.
- 5.8.3 The detailed design, delivery, and ongoing maintenance of POS and associated landscaping are expected to be secured through a Landscape and Ecology Management Plan (LEMP), or a similar mechanism, to be agreed as part of a planning condition tied to the outline consent.

## 5.9 Summary of Effects

- 5.9.1 **Tables 5.15, 5.16 and 5.17** below provide a summary of the effects, receptors, residual effects and conclusions of significance considered within the Chapter at all three stages of assessment.

## 5.10 Conclusion

- 5.10.1 This Chapter has assessed the likely significant landscape and visual effects arising from the Proposed Scheme, considering both the construction and operational phases. The assessment has been informed by a thorough appraisal of baseline conditions, relevant planning policy, landscape designations, visual receptors, and the detailed design of the Proposed Scheme, including embedded primary and tertiary mitigation measures.
- 5.10.2 During the construction phase, the most notable effects will occur within the Site itself, where the transition from an agricultural landscape to a construction environment will result in a major, adverse, and significant effect on the Site's character. Within the adjacent settlement to the east, where visual and physical connectivity is greatest, moderate adverse effects are also expected, albeit temporary in duration. Outside of the settlement and in more rural areas—including within the Wye Valley NL—effects are



assessed as not significant, due to limited visibility and the filtering influence of existing topography and vegetation.

- 5.10.3 In the operational phase (Year 1), the introduction of built form, new infrastructure, and associated open spaces will result in a fundamental change to the Site's character. This change will be clearly perceived from a small number of visual receptor locations in close proximity, particularly from nearby residential properties and roads. This is not a byproduct of bad design, rather it is a common result of a wholesale change of land use, from agricultural fields to residential development. The degree of effect will reduce with distance, with the wider landscape context—including the Wye Valley NL—experiencing minimal change due to limited intervisibility and the relatively small scale of the development in relation to the designation.
- 5.10.4 By Year 15, following the establishment of mitigation planting and the softening of built edges, the development will appear more integrated within its context. New tree planting and green infrastructure will support ecological value, reinforce landscape structure, and contribute positively to visual amenity. Residual effects at this stage are reduced in both magnitude and significance for most receptors. However, within the immediate vicinity of the Site—particularly at the Site itself and its eastern interface with the existing settlement—some perceptible change to landscape character and views will remain. By Year 15, all previously identified significant effects will have been effectively mitigated through sensitive design and the implementation of landscape measures. While some change will remain perceptible in relation to landscape character and visual amenity, these effects are not considered significant in EIA terms. The maturation of planting and continued integration of the scheme into its surroundings will ensure that the development sits more comfortably within the receiving landscape over time.
- 5.10.5 Overall, the assessment concludes that while significant effects are expected during the construction phase and early operational years for certain landscape and visual receptors within and immediately adjacent to the Site, these effects will reduce over time. By Year 15, no residual significant effects are anticipated. The landscape-led design approach, together with embedded mitigation measures, has successfully minimised adverse impacts and will enable the scheme to become a well-integrated and appropriate addition to the settlement edge in the long term.

## 5.11 References

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**Table 5.15: Summary of Likely Significant Effects on Landscape Character and Visual Amenity – Construction Phase**

Receptor	Sensitivity of Receptor	Short/Medium/Long Term	Magnitude of Change	Residual effect
Landscape Character of the Site	Medium	Short to Medium Term	Very High	Major
Landscape Character of Site's Immediate and Wider Context – Within Settlement	Low	Short to Medium Term	High	Moderate
Residential Properties along the A466 and St Lawrence Road	Medium	Short to Medium Term	High	Major/Moderate
Residential Properties along Mounton Road	High	Short to Medium Term	High	Major
PVP EDP 3: View from A48, south of the site.	Low	Short to Medium Term	Very High	Major/-Moderate
PVP EDP 4: View from A466, adjacent to eastern site boundary, looking west.	Low	Short to Medium Term	Very High	Major/-Moderate
PVP EDP 5: View from Mounton Road, at the northern site boundary.	Low	Short to Medium Term	Very High	Major/-Moderate
PVP EDP 9: View from St Lawrence Lane.	Medium	Short to Medium Term	Medium	Moderate

**Table 5.16: Summary of Likely Significant Effects on Landscape Character and Visual Amenity – Operation: Year 1**

Receptor	Sensitivity of Receptor	Short/Medium/Long Term	Magnitude of Change	Residual effect
Landscape Character of the Site	Medium	Medium to Long Term	High	Major/-Moderate
Residential Properties along the A466 and St Lawrence Road	Medium	Medium to Long Term	High	Major/-Moderate
Residential Properties along Mounton Road	High	Medium to Long Term	High	Major
PVP EDP 3: View from A48, south of the site.	Low	Medium to Long Term	High	Moderate
PVP EDP 4: View from A466, adjacent to eastern site boundary, looking west.	Low	Medium to Long Term	Very High	Major/-Moderate
PVP EDP 5: View from Mounton Road, at the northern site boundary.	Low	Medium to Long Term	Very High	Major/-Moderate
PVP EDP 9: View from St Lawrence Lane.	Medium	Medium to Long Term	Medium	Moderate

**Significant Effects on Landscape Character and Visual Amenity – Operation: Year 15**

As set out in this ES Chapter and its accompanying Technical Appendices, all residual significant effects at Year 15 of operation have been addressed through the careful application of mitigation measures and informed layout design. While some effects will remain in relation to landscape character and visual amenity, it is EDP's professional judgement that the significant effects identified at construction and Year 1 will have further diminished over time, such that they will no longer be considered significant in EIA terms once the mitigation has matured and the scheme has become more fully integrated into the landscape.

## 6 HISTORIC ASSETS

### 6.1 Introduction

- 6.1.1 This Chapter reports the outcome of the identification and assessment of likely significant environmental effects from the Proposed Scheme in terms of historic assets.
- 6.1.2 It describes the scope of the assessment and the assessment methodology which has been employed before setting out a summary of the baseline information that has informed the completion of the assessment process. It also presents an identification and assessment of the likely significant effects arising from the implementation of the Proposed Scheme, details the further measures of mitigation or compensation which are required to prevent, reduce or offset any significant adverse effects or further enhance beneficial effects and then identifies the nature and magnitude of any long term residual effects which will remain following the application of those measures.
- 6.1.3 In that regard, the conclusions of this Chapter are provided both in terms of the residual effects and whether or not those are considered significant in terms of the Environmental Impact Assessment (EIA) Regulations.
- 6.1.4 This Chapter, which is supported by **Appendix 6.1** (Heritage Assessment Ref: edp6238\_r009) and in addition, **Figures 6.1 to 6.2**, are intended to be read as part of the wider Environmental Statement (ES) and with particular reference to the introductory chapters (**Chapters 1 to 3**) and **Chapter 5: Landscape and Visual Character**.

### 6.2 Assessment Methodology

- 6.2.1 A Scoping Report was submitted (by the applicant) to Monmouthshire County Council, in its role as the Local Planning Authority, on 30 January 2025 and a Scoping Opinion was then subsequently provided by the Council on 04 April 2025 (**Appendix 1.2**). This section of the Chapter therefore sets out the scope of the assessment which has been undertaken in light of the Scoping Opinion to identify any potentially significant effects from the Proposed Scheme on historic assets.

#### Planning Policy Context

- 6.2.2 As set out in section 2 of **Appendix 6.1**, the following legislation and planning policy documents are of relevance to the conservation and management of the historic environment in Wales and therefore govern the evaluation of the Proposed Scheme and determination of the outline planning application:

- *The Historic Environment (Wales) Act 2023*;



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- *Town and Country Planning Act 1990* (as amended);
  - *Future Wales: The National Plan 2040* (adopted 2021);
  - *Planning Policy Wales: Edition 12 (2024) Chapter 6: Distinctive and Natural Places*;
  - *Technical Advice Note (TAN) 24: The Historic Environment* (2017);
  - *Monmouthshire Local Development Plan 2011-2021* (adopted 2014); and
  - *Monmouthshire Replacement Local Development Plan 2018-2033 Deposit Plan* (October 2025).

6.2.3 The conformity (or otherwise) of the Proposed Scheme with this legislative and planning policy framework will be detailed elsewhere in the ES.

## Relevant Guidance

6.2.4 As set out in section 3 of **Appendix 6.1**, the following best practice professional guidance has been employed in the identification and assessment of potentially significant effects on historic assets arising from the approval and implementation of the Proposed Scheme:

- Cadw (2011) *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*;
- Cadw (2017a) *Heritage Impact Assessment in Wales*;
- Cadw (2017b) *Setting of Historic Assets in Wales*; and
- Chartered Institute for Archaeologists (2020) *Standard and Guidance for Historic Environment Desk-Based Assessment* Chartered Institute for Archaeologists.

6.2.5 More detailed information on these guidance documents and their employment in the identification and assessment of significant effects can be found in sections 3 to 5 of **Appendix 6.1**.

## Study Area

6.2.6 Paragraphs 4.6 to 4.12 of **Appendix 6.1** summarise the approach which was taken to the identification of historic assets which might be affected by the approval and implementation of the Proposed Scheme, in order to fulfil Stage 1 of Cadw's guidance (2017b).

6.2.7 As the setting of historic assets is not defined or constrained with reference to spatial extents, no specific or set Study Area was defined for the purpose of identifying historic assets which might be affected by the implementation of the Proposed Scheme.



- 6.2.8 Instead, the process defined by Stage 1 of Cadw (2017b) was employed from the outset to determine the parameters of the investigation and assessment process instead of relying on an artificially or arbitrarily limited Study Area defined by reference to geographic or spatial boundaries.

## Baseline Methodology

- 6.2.9 The methodology employed in the identification of the current baseline position; both within the Site and in its wider surrounding area; is set out in section 3 of **Appendix 6.1** and it should be consulted for further information and clarification in this respect.

## Consultation

- 6.2.10 No specific consultation: in terms of the identification of potentially sensitive heritage receptors, the methodology for identifying and assessing potentially significant effects or the design of the Proposed Scheme to address and then either avoid or minimise those effects; has been undertaken with Council officers or consultees in the preparation of this ES chapter.
- 6.2.11 All consultation and engagement with the Council and its heritage consultees has been undertaken under the auspices of the Replacement Local Development Plan process and the preparation and submission of the request for a Scoping Opinion that identified the requirement for this ES chapter.

## Assessment Criteria and Assignment of Significance

- 6.2.12 The assessment of likely significant environmental effects as a result of the Proposed Scheme has taken into account the construction and operational phases.
- 6.2.13 The duration of the effects has been assessed as either 'short-term', 'medium-term' or 'long-term'. Short-term is considered to be up to one year, medium-term is considered to be between one and 10 years and long term is considered to be greater than 10 years.

## Determining the Sensitivity of Receptor

- 6.2.14 The sensitivity of potentially affected receptors has been considered on a scale of high, medium, low or negligible in the manner illustrated in **Table 6.1**.

**Table 6.1: Sensitivity of Heritage Receptor**

Receptor	Sensitivity of Receptor			
	High	Medium	Low	Negligible
World Heritage Site				
Scheduled Monument				
Grade I or II* Listed Building				





Grade I or II* Registered Park or Garden				
Registered Battlefield				
Other Nationally important archaeological asset				
Grade II Listed Building				
Grade II Registered Park or Garden				
Conservation Area				
Other asset of Regional or County importance				
Locally important asset with cultural or educational value				
Site or feature with no significant heritage value or interest				

- 6.2.15 The sensitivity of potentially affected heritage receptors is defined using the criteria in **Table 6.1** (above) and professional judgment where relevant and appropriate.

### Determining the Magnitude of Change

- 6.2.16 The magnitude of change is considered to be the change experienced from the baseline condition at the sensitive receptor and on a scale of 'large', 'medium', 'small' or 'negligible' (see **Table 6.2** below).

**Table 6.2: Magnitude of Change**

Sensitivity	Descriptors
<b>Large</b>	Change to an historic asset, either directly or through change within its setting, so that its significance is completely altered or destroyed.
<b>Medium</b>	Change to an historic asset, either directly or through change within its setting, so that there is a demonstrable change to its significance.
<b>Small</b>	Change to an historic asset, either directly or through change within its setting, so that there is a small change to its significance.
<b>Negligible</b>	Change to an historic asset, either directly or through change within its setting, so that there is all but no change to its significance.
<b>No Change</b>	Change to an historic asset, either directly or through change within its setting, which has no bearing on its significance.

- 6.2.17 It should be noted that the 'significance' of historic assets is a separate and distinct judgement in relation to its sensitivity and should not be confused with the 'significance of effect' (below) which focuses on the nature and magnitude of impact to the receptor according to the EIA Regulations (2017).
- 6.2.18 The classification of the nature and magnitude of impact on historic assets is rigorous and based on clear and consistent criteria and the application of professional judgement where relevant and appropriate.



- 6.2.19 The classification process takes account of such factors as the physical scale and type of disturbance to receptors and whether features or evidence would be damaged or lost that are fundamental or important to their character, integrity and therefore significance (sensitivity).

### Determining the Level of Effect

- 6.2.20 The predicted level of effect has been assessed based on the magnitude of change predicted to arise from the Proposed Scheme and the evaluation of the sensitivity of the affected heritage receptor.
- 6.2.21 In each case, the predicted level of effect for a heritage receptor is based on professional judgement in combination with the application of the criteria that are set out in **Table 6.3**.

**Table 6.3: Significance of Effect**

Sensitivity	Magnitude of Change				
	No Change	Negligible	Small	Medium	Large
<b>Negligible</b>	No change	Negligible	Negligible or Minor	Negligible or Minor	Minor
<b>Low</b>	No change	Negligible or Minor	Negligible or Minor	Minor	Minor or Moderate
<b>Medium</b>	No change	Negligible or Minor	Minor	Moderate	Moderate or Major
<b>High</b>	No change	Minor	Minor or Moderate	Moderate or Major	Major or Substantial

- 6.2.22 Whilst **Table 6.3** provides ranges, the level of effect is confirmed as a single level and not a range and this is informed and underpinned by professional judgement.
- 6.2.23 In each case, it is determined whether the effect on the heritage receptor is 'beneficial' or 'adverse' and a statement is also made as to whether the effect is 'significant' or 'not significant', once again based on the application of professional judgement.
- 6.2.24 The following consistently applied terms have been used to define the significance of effects identified in respect of heritage receptors and these can (in each case) be 'beneficial' or 'adverse'.
- **Major:** where the Proposed Scheme is likely to cause a considerable change from the baseline conditions and the heritage receptor has limited adaptability, tolerance or recoverability, or it is of the highest sensitivity. This effect is 'significant';
  - **Moderate:** where the Proposed Scheme is likely to cause either a considerable change from the baseline conditions at a receptor which has a degree of adaptability, tolerance or recoverability or a less than considerable change at a heritage receptor that has limited adaptability, tolerance or recoverability. The effect is likely to be 'significant', but it is subject to professional judgement;



- **Minor:** where the Proposed Scheme is likely to cause a small, but noticeable, change from the baseline conditions at a heritage receptor which has limited adaptability, tolerance or recoverability or it is of the highest sensitivity; or where the Proposed Scheme is likely to cause a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change and/or can recover from the change. This effect is considered unlikely to be 'significant', but once again that will be subject to professional judgement;
- **Negligible:** where the Proposed Scheme is unlikely to cause a noticeable change in the baseline conditions at a heritage receptor despite its level of sensitivity or there would be considerable change to a receptor not considered sensitive to change. This effect is 'not significant'; and
- **No Change:** where the Proposed Scheme's implementation is assessed as causing no loss of, or damage to, the significance of the historic asset in question.

6.2.25 The results of the application of this widely used and industry standard methodology for the identification and assessment of potentially significant effects on historic assets (both designated and non-designated) are set out below in main part of this ES chapter.

## Limitations of the Assessment

- 6.2.26 No specific assumptions have been made in the identification of the baseline position or the identification and assessment of potentially significant effects, with the latter proportionate to the certainty achievable within the context of an outline planning application.
- 6.2.27 Where possible, baseline data (from citation documents and the like) has been reviewed in the field through the completion of site visits and walkovers, in order to check and confirm its accuracy, but there are limitations to that process (see below) and therefore in some cases it has had to be assumed that the baseline information is robust and has been subject to the usual checks for accuracy and veracity.
- 6.2.28 The only specific limitations to the identification and assessment of potentially significant effects are in respect of access to 'off-site' historic assets that are in third party ownership, and it is not in the control of the applicant to either grant or negotiate access for site visits and walkovers.
- 6.2.29 Extensive use has been made of the Public Rights of Way network in the wider surroundings of the Site to identify and assess the current baseline position and the potential nature and magnitude of any off-site effects derived from the implementation of the Proposed Scheme and therefore this is not considered to represent a significant limitation to the accuracy and robustness of the assessment process.



## 6.3 Baseline Environment

- 6.3.1 The following paragraphs present a summary of the baseline position at the Site and in its wider surroundings, as defined in the Heritage Assessment (**Appendix 6.1**), insofar as it is relevant to the heritage receptors that are identified as having the potential to experience a significant effect as a result of the approval and implementation of the Proposed Scheme.
- 6.3.2 In that regard, the following paragraphs will only reproduce key passages from the Heritage Assessment to define the baseline position and instead, **Appendix 6.1** should be consulted for more detailed consideration and assessment of the relevant heritage receptors.

### Historic Assets within the Site

- 6.3.3 As paragraph 4.4 of **Appendix 6.1** makes clear, the site does not contain any ‘designated’ historic assets such as listed buildings (of any of grade) or scheduled monuments and neither does it include any part of such an asset within its redline boundary.
- 6.3.4 Likewise, the site is not located within the boundary of a designated ‘area’ such as a conservation area identified and adopted by the Local Planning Authority or a Registered Park and Garden (RPG) that has been designated by Cadw and neither does the site’s boundary include any part of such an asset.
- 6.3.5 There are no ‘non-designated’ built historic assets within the site, such as ‘locally listed buildings’ assessed and designated by the Local Planning Authority and maintained on an adopted Local List, and in fact there are no standing buildings or structures located within the site that have been identified as potentially holding a degree of heritage interest through identification on the local archaeological database, in this case Heneb’s (formerly GGAT’s) Historic Environment Record.

### Historic Assets within the Site’s Surroundings

- 6.3.6 Paragraphs 4.6 to 4.12 of **Appendix 6.1** identify that, based on the completion of desk studies, theoretical modelling and site visits completed over a number of years by EDP, only a small number of the numerous designated historic assets located in its wider surroundings have the potential to be affected by the site’s residential development indirectly as a result of changes within their setting.
- 6.3.7 The application of Stage 1 of the Cadw setting guidance (Cadw 2017b) has identified that the following historic assets warrant more detailed consideration and assessment due to their relationships within the land at the site and the potential for them to be adversely affected by its proposed development:
- St. Lawrence House Grade II Listed Building [ID 2606];
  - Wyelands Grade II RPG [PGW(Gt)51(MON)];



- Mathern Conservation Area; and
- Mounton House Grade II\* RPG [PGW(Gt)8(MON)].

6.3.8 Therefore, as **Appendix 6.1** illustrates, only those four designated historic assets were taken forward to the application of Stages 2, 3 and 4 of the Cadw guidance on setting assessment (see Cadw 2017b). The application of that best practice guidance to these assets will be summarised below, but it is also presented in detail in sections 4, 5 and 6 of **Appendix 6.1**.

6.3.9 Whilst **Figure 6.1** demonstrates that there are numerous other ‘designated’ historic assets in the general surroundings of the site (including listed buildings, scheduled monuments and conservation areas); their spatial separation from the site and the specific properties of their wider setting, coupled with the natural topography, the form, nature and extent of the built environment and trees and vegetation cover in the intervening landscape; means that they are not sensitive receptors in terms of the approval and implementation of the Proposed Scheme and are not likely to be adversely impacted or harmed as a result.

#### **Stage 2 of Cadw (2017)**

6.3.10 The following paragraphs summarise information set out in **Appendix 6.1** and focused on the application of the guidance from Cadw regarding the setting of historic assets.

#### ***St. Lawrence House Grade II Listed Building [ID 2606]***

6.3.11 Paragraphs 4.15 to 4.78 of **Appendix 6.1** apply Stage 2 of Cadw (2017b) to this Grade II listed building located to the north of the site; defining and analysing this designated asset’s setting to understand how, in what way(s) and to what extent it contributes to its significance.

6.3.12 Paragraphs 4.75 and 4.76 then summarise the key information, insofar as the land at the site represents an element of this heritage asset’s setting which makes a contribution to its significance:

*“In view of the information and assessment above, it is assessed that the following represent the aspects of St. Lawrence House’s wider setting that make the biggest contributions to its significance:*

- 1. Its relationships with the ancillary buildings to the north and east (beyond the site) that run in a band alongside Mounton Road due to the fact that these would have fulfilled and performed a range of supportive, ancillary functions from the 19th century at least;*
- 2. Its relationships with the pleasure grounds and denser areas of mature landscaping to both the east of the house and to the west (and north of the site in both cases) in view of the fact they appear to have formed the principal areas of intended and ornamental design around the house from at least the mid 19th century;*



3. *Its relationship with Mounton Road (to the north), from which it is generally screened and separated by a high and stone-built enclosure wall but which also (a) formed the main point of access for visitors and (b) afforded access to the service areas via the gated entrance at the rear;*
4. *Its relationship with the ‘designed’ parkland in the north west corner of the site, where the scattered arrangement of trees was doubtless intended to afford an experience of the house as a ‘gentlemen’s residence’ set within an ornamental landscape and not a productive one;*
5. *To a lesser degree, its relationships with the ‘productive’ landscape of sheep-grazed pasture in the east and south of the site, which developed as part of the wider estate around the house in the later 19th century or the early years of the 20th century and is understood to have supported its operation and occupation (albeit not anymore); and*
6. *Its position on the upper reaches of a south-facing slope so that the house forms the main focal-point of the inwards views and where the natural landform also offers long range and commanding views towards the River Severn.*

*With that in mind, it is concluded that the land at the site represents a part of the setting of St. Lawrence House which contributes to its significance, with (4), (5) and (6) the elements of the asset’s wider setting that could be affected by its proposed development.”*

- 6.3.13 A plan showing the relationship of this designated historic asset to the site can be found at **Figure 6.2** and should be consulted alongside the text above.
- 6.3.14 Inherent mitigation measures designed into the Proposed Scheme to either eliminate or minimise adverse impacts on St. Lawrence House Grade II listed building are set out in paragraphs 6.4.2 below and thereafter, paragraphs 6.5.4 to 6.5.8 and 6.6.4 to 6.6.8 of this Chapter outline the nature and magnitude of any remaining impacts on this asset during construction and following completion.

***Wyelands Grade II RPG [PGW(Gt)51(MON)]***

- 6.3.15 Paragraphs 4.79 to 4.101 of **Appendix 6.1** apply Stage 2 of Cadw (2017b) to this Grade II RPG, which is located to the south of the site; both defining and analysing this designated asset’s setting to understand how, in what way(s) and to what extent it contributes to its significance.
- 6.3.16 Paragraph 4.97 of **Appendix 6.1** identifies that:

*“As far as the site is concerned, there is little or no relationship with the RPG because of the screening effect of the mature woodland plantation on the junction between the A48 main road and St. Lawrence Lane, as well as the group of buildings north of High Beech Farm on the southern side of the busy thoroughfare.”*



- 6.3.17 Paragraphs 4.98 to 4.100 then build on this position and conclude that *“The mature plantations within the site around the A48/St. Lawrence Lane junction and the edges of the High Beech roundabout similarly serve to contain and screen the agricultural fields of the site, so much so that there is a distinction and separation between the sit and the RPG emphasising that, in spite of its relative proximity, the site does not contribute to the asset’s significance despite forming a small and peripheral aspect of its surroundings”*.
- 6.3.18 As a result of that assessment, it is determined in paragraph 4.101 of **Appendix 6.1** that Wyelands Grade II RPG and the listed buildings it contains are ‘highly unlikely’ to experience a loss of significance as a result of the Proposed Scheme being taken forward and implemented because the land at the site does not form an aspect of their setting which contributes to their significance.

#### **Mathern Conservation Area**

- 6.3.19 Paragraphs 4.102 to 4.135 of **Appendix 6.1** apply Stage 2 of Cadw (2017b) to this conservation area, which, in common with Wyelands RPG, is located to the south of the site; defining and analysing this designated asset’s setting to understand how, in what way(s) and to what extent it contributes to its significance.
- 6.3.20 In this respect, paragraph 4.129 first identifies that *“...the setting of the conservation area contributes little or nothing to its significance and with this being drawn from the availability of views to the River Severn and its relationships with that river corridor”* and paragraph 4.134 then adds the following:
- “...there is all but no experience of the land within the boundary from the conservation area as a result of the screening that is provided by the buildings on the north side of High Beech Farm and mature plantation of trees which marks the junction of S. Lawrence Lane and the A48. The same is true of the experience looking outwards to the south from within the site towards the conservation area”*.
- 6.3.21 As a result, paragraph 4.135 of **Appendix 6.1** concludes that *“...insofar as the site is technically within the setting of the Mathern Conservation Area, it forms a part of its setting that makes no particular contribution to its heritage significance and so hence this asset is very unlikely to be adversely affected by the proposed development of land within the site’s footprint”*.

#### **Mounton House Grade II\* RPG [PGW(Gt)8(MON)]**

- 6.3.22 Paragraphs 4.136 to 4.158 of **Appendix 6.1** apply Stage 2 of Cadw (2017b) to this Grade II\* RPG, which is located circa.450 metres south-west of the site; defining and analysing this designated asset’s setting to understand how, in what way(s) and to what extent it contributes to its significance.
- 6.3.23 Paragraph 4.154 details the following in respect of the asset’s setting:
- “The nature and form of the ‘designed’ landscape around Mounton House does no suggest that views beyond its borders into the surrounding farmland make an important contribution to its significance and instead the features that do are isolation, seclusion and tranquillity from the wider world within a natural landscape of woodland and parkland trees.”*



- 6.3.24 In terms of this designated historic asset's visual relationship with the land at the site, paragraph 4.156 states the following:

*"As far as the site is concerned, whilst it is possible to obtain views of the wooded eastern edges of the RPG from the land in the north western corner, it is noted that these views do not offer an appreciation of the significance of this designated historic asset, are also very distant and from a localised area of the site's edge to the north of the wooded plantations that otherwise characterise and enclose the western fringes".*

- 6.3.25 Whilst the limitations on access to the interior of the Grade II\* RPG are identified and recognised, it is clearly concluded in paragraph 4.157 of **Appendix 6.1** that "...the land within the site does not represent part of the asset's setting that makes a contribution to its heritage significance" and hence it is subsequently determined that neither Mounton House RPG nor the listed buildings it contains are likely to experience a loss of their significance as a result of the Proposed Scheme's implementation.

### Future Baseline Conditions

- 6.3.26 As far as the 'future' baseline position is concerned, there is no reason to believe or expect that the use or appearance and character of the land within the site boundary are likely to change in a way or to an extent that would alter the existing baseline position in terms of its contribution (or otherwise) to the setting and significance of historic assets located in its wider surroundings.
- 6.3.27 The site (as existing) comprises fields of sheep-grazed permanent pasture that are enclosed and separated by a mixture of hedgerows, woodland plantations, park rail fences and stone walls. Whilst climate change could potentially result in changes to the composition of tree and shrub species within the hedgerows and wooded plantations and changes to the farming regime within the fields themselves, it is considered very unlikely that they would alter the baseline position in a way or to an extent that would bear upon and alter the assessment set out in the preceding paragraphs.
- 6.3.28 This is on the basis that the (1) the precise farming regime is not itself a factor in the assessment process and instead it is the form and character of the land which is the contributor to significance, and there is no expectation that it would cease to be farmed altogether, and (2) whilst it is conceivable that there might be changes in the composition of the boundary plantations and hedgerows, there is no reason to believe or expect that the features themselves would cease to exist and instead the expectation is that they would continue to persist, but with a more appropriate and sustainable selection of tree and shrub species that is suitable for the climatic conditions that develop over time.





## 6.4 Mitigation Measures Adopted as Part of the Project

6.4.1 Based on the assessment set out in section 4 of **Appendix 6.1** and summarised in the preceding section, the only historic asset located in the site's surroundings that would potentially be affected by the implementation of the Proposed Scheme is the Grade II listed St. Lawrence House.

6.4.2 Paragraph 5.2 of **Appendix 6.1** sets out the design measures which are recommended to be incorporated into the Proposed Scheme to eliminate or minimise its impact on the significance of St. Lawrence House Grade II listed building as a result of changes within its setting. These are as follows:

*"Paragraph 4.77 (above) sets out a number of measures that the masterplan should include to avoid or minimise impacts on St. Lawrence House as a result of changes within its setting, with these listed as follows:*

- *Retention and conservation of the walled gardens, orchard and other aspects of the more designed garden landscape to the west of the house and within the boundary of the site and their re-use as part of the open space and landscaping;*
- *Retention and enhancement of the designed parkland landscape in the north west of the site and in front of the house and their re-use as part of the open space;*
- *The concentration of buildings of greater height and mass towards the site's eastern edge and not in front of the main south-facing elevation so that views out over the falling landscape should be maintained from in and around the house;*
- *The restriction of residential development to two storeys within the site on the falling landform south of the house to maintain its prominence within its surroundings;*
- *The concentration of lower density (residential) development on the land within the site, south and south east of the house, to either retain existing views or form new views of/towards the building; and*
- *The retention and conservation of boundary features wherever possible, specifically including the stone wall on the eastern side."*

6.4.3 Thereafter, paragraphs 5.4 to 5.10 of **Appendix 6.1** summarise the key elements of the Proposed Scheme and set out the aspects that would change the setting of St. Lawrence House and potentially affect the contribution it makes to this listed building's significance.



- 6.4.4 It is concluded in section 4 of **Appendix 6.1** (see above) that none of the other three designated assets which *might* (see Stage 1 of Cadw 2017b) be affected by the Proposed Scheme are likely to be affected by its approval and implementation.
- 6.4.5 This assessment is made on the basis that the land at the site does not represent an aspect of the assets' setting that makes any particular contribution to their significance and (as such) they are considered to be unlikely to lose significance as a result of its approval and implementation.
- 6.4.6 As a consequence, no specific mitigation measures are identified or included within the detailed design of the Proposed Scheme to eliminate or reduce potential adverse impacts.

## 6.5 Assessment of Construction Effects

- 6.5.1 This section of the chapter identifies the significance of any effects arising from the approval and implementation of the Proposed Scheme in terms of the historic assets identified as being potentially sensitive receptors because of their relationships to the site.
- 6.5.2 First of all, it identifies the nature and magnitude of changes to the significance of the relevant heritage receptors from the Proposed Scheme during construction and thereafter considers the 'significance' of any effects arising in terms of the EIA Regulations (2017).
- 6.5.3 In all cases, the assessment process takes into account and includes the 'inherent' mitigation measures identified in the preceding section (section 6.4 of this chapter).

### **St. Lawrence House Grade II Listed Building [ID 2606]**

- 6.5.4 There would be no direct impact on this designated historic asset during the construction phase of the Proposed Scheme in view of the fact that it is located outside the boundary of the site and some distance from the proposed vehicular access which is expected to be used by construction traffic.
- 6.5.5 In terms of the potential for 'indirect' effects as a result of changes within the asset's setting, it is recognised that these changes will not come fully formed following the approval and completion of the Proposed Scheme and they will (instead) emerge and develop over time through the implementation of the construction programme.
- 6.5.6 However, it is expected that 'good practice' construction processes, such as control of working hours and the management of dust and noise, would effectively and satisfactorily mitigate any indirect impacts from the implementation of the Proposed Scheme through to completion.
- 6.5.7 Moreover, whilst it is recognised that changes within the setting of this asset will emerge and evolve over time as the Proposed Scheme is implemented, those changes will reach their fullest and greatest extent at



completion and so it is therefore preferable for them to be identified and assessed then, rather than during construction in view of the developing nature of the relationships.

- 6.5.8 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** in the construction stage.

#### **Wyelands Grade II RPG [PGW(Gt)51(MON)]**

- 6.5.9 There would be no direct impact on this designated historic asset during the construction phase of the Proposed Scheme in view of the fact that it is located outside the boundary of the site and already bounded in parts by the A48 main road in the north; this is a busy and well-trafficked vehicular route that connects Chepstow and Newport and hence it is considered highly unlikely that its use by construction vehicles would generate adverse impacts in respect of changes to its setting.
- 6.5.10 In terms of the potential for 'indirect' effects as a result of changes within the asset's setting, it is recognised that these changes will not come fully formed following the approval and completion of the Proposed Scheme and they will (instead) emerge and develop over time through the implementation of the construction programme.
- 6.5.11 However, it is expected that 'good practice' construction processes, such as control of working hours and the management of dust and noise, would effectively and satisfactorily mitigate any indirect impacts from the implementation of the Proposed Scheme through to completion.
- 6.5.12 Moreover, whilst it is recognised that changes within the setting of this asset will emerge and evolve over time as the Proposed Scheme is implemented, those changes will reach their fullest and greatest extent at completion and so it is therefore preferable for them to be identified and assessed then, rather than during construction in view of the developing nature of the relationships.
- 6.5.13 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** in the construction stage.

#### **Mathern Conservation Area**

- 6.5.14 There would be no direct impact on this designated historic asset during the construction phase of the Proposed Scheme in view of the fact that it is located outside the boundary of the site and already bounded in parts by the A48 main road in the north and A466 in the east. These are busy and well-trafficked vehicular routes which connect the M48, Chepstow and Newport and so as a consequence it is considered highly unlikely that the use of these two roads by construction vehicles would generate adverse impacts in respect of changes to its setting.



- 6.5.15 In terms of the potential for 'indirect' effects as a result of changes within the asset's setting, it is recognised that these changes will not come fully formed following the approval and completion of the Proposed Scheme and they will (instead) emerge and develop over time through the implementation of the construction programme.
- 6.5.16 However, it is expected that 'good practice' construction processes, such as control of working hours and the management of dust and noise, would effectively and satisfactorily mitigate any indirect impacts from the implementation of the Proposed Scheme through to completion.
- 6.5.17 Moreover, whilst it is recognised that changes within the setting of this asset will emerge and evolve over time as the Proposed Scheme is implemented, those changes will reach their fullest and greatest extent at completion and so it is therefore preferable for them to be identified and assessed then, rather than during construction in view of the developing nature of the relationships.
- 6.5.18 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of medium sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** in the construction stage.

#### **Mounton House Grade II\* RPG [PGW(Gt)8(MON)]**

- 6.5.19 There would be no direct impact on this designated historic asset during the construction phase of the Proposed Scheme in view of the fact that it is located outside the boundary of the site and some distance from the proposed vehicular access which is expected to be used by construction traffic. It is also set back away from the A48 main road (connecting Chepstow and Newport) and therefore it is considered to be highly unlikely that the use of this busy and well-trafficked main road by construction vehicles would generate adverse impacts in respect of changes to its setting.
- 6.5.20 In terms of the potential for 'indirect' effects as a result of changes within the asset's setting, it is recognised that these changes will not come fully formed following the approval and completion of the Proposed Scheme and they will (instead) emerge and develop over time through the implementation of the construction programme.
- 6.5.21 However, it is expected that 'good practice' construction processes, such as control of working hours and the management of dust and noise, would effectively and satisfactorily mitigate any indirect impacts from the implementation of the Proposed Scheme through to completion.
- 6.5.22 Moreover, whilst it is recognised that changes within the setting of this asset will emerge and evolve over time as the Proposed Scheme is implemented, those changes will reach their fullest and greatest extent at completion and so it is therefore preferable for them to be identified and assessed then, rather than during construction in view of the developing nature of the relationships.



- 6.5.23 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** in the construction stage.

### Further Mitigation

- 6.5.24 No further mitigation measures are necessary or warranted in respect of the identification and assessment of construction phase effects in the preceding paragraphs and therefore no such measures are proposed to be implemented during this first phase of work on the Proposed Scheme.

### Future Monitoring

- 6.5.25 In view of the preceding assessment, it is not expected that any specific monitoring will be required at the site or in association with the implementation of the Proposed Scheme during the construction phase; and so no such measures are proposed or identified here.

### Accidents and/or Disasters

- 6.5.26 In view of their spatial separation from the site, it is considered highly unlikely that accidents or disasters resulting from construction activities within its boundaries would have the potential to adversely impact upon the conservation of the physical form and fabric of any of the historic assets which are identified as representing potentially sensitive heritage receptors.

## 6.6 Assessment of Operational Effects

- 6.6.1 This section of the chapter identifies the significance of any effects arising from the approval and implementation of the Proposed Scheme in terms of the historic assets identified as being potentially sensitive receptors because of their relationships to the site.
- 6.6.2 First of all, it identifies the nature and magnitude of changes to the significance of the relevant heritage receptors from the Proposed Scheme during construction and thereafter considers the 'significance' of any effects arising in terms of the EIA Regulations (2017).
- 6.6.3 In all cases, the assessment process takes into account and includes the 'inherent' mitigation measures identified in the preceding section (section 6.4 of this chapter).

### St. Lawrence House Grade II Listed Building [ID 2606]

- 6.6.4 Paragraphs 5.11 to 5.27 of **Appendix 6.1** identify and assess the nature and magnitude of indirect impacts on the significance of this Grade II listed building from the implementation of the Proposed Scheme and in terms of changes within its setting.



6.6.5 In that regard, paragraph 5.19 states the following:

*“The implementation of the proposed development, with the exception of small areas in the far south and west, would result in the loss of the ‘productive’ landscape of large, sheep-grazed fields associated with the listed building since at least the start of the 20<sup>th</sup> century based on the available maps and other sources”*

6.6.6 Whilst paragraph 5.25 then observes that measures could be brought forward and implemented through the Reserved Matters process to “...maintain and enhance views towards and from the building through the detailed layout, storey heights, precise siting and boundaries of the Public Open Spaces and landscaping to deliver new opportunities for the residents and visitors to enjoy views of the asset and understand and appreciate its special interest”, the subsequent paragraph (5.26) observes that:

*“It is also true to say that the retention and enhancement of the designed parkland areas in the north west corner of the site will maintain and preserve the outwards views south from the principal south-facing elevation of St. Lawrence House. This would similarly maintain its visual and historic connections with the River Sever in the far distance as the built aspects of the development proposals would be positioned further east to the side”.*

6.6.7 In terms of the impact of the Proposed Scheme at the Operational Stage, paragraph 5.27 of **Appendix 6.1** sets out the following assessment:

*“So, in view of the situation above and the measures which have and could be incorporated into the proposals, there is clearly no reason to believe or expect that the loss of significance from St. Lawrence House as a Grade II listed building would be anything other than small or limited because (in contrast) the vast majority of the contributing elements of this historic asset’s heritage significance and more important aspects of its setting would be unaffected by the development’s subsequent implementation”.*

6.6.8 Therefore, in terms of the application of the criteria which are set out in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity and there would be a small magnitude of change as a result of the implementation of the Proposed Scheme at the Operational Stage. This would therefore give rise to a permanent and ‘**minor adverse**’ impact that would be ‘not significant’ in terms of the EIA Regulations (2017).

#### **Wyelands Grade II RPG [PGW(Gt)51(MON)]**

6.6.9 Paragraphs 5.28 to 5.30 of **Appendix 6.1** identify and assess the nature and magnitude of indirect impacts on the significance of this Grade II RPG through the implementation of the Proposed Scheme and in terms of changes within its setting.



- 6.6.10 Taking into account the inherent mitigation measures built into the Proposed Scheme following the completion of the baseline studies (set out in paragraph 5.29 of **Appendix 6.1**), paragraph 5.30 reaches the following conclusion in terms of its impact:

*“Therefore, whilst it is assessed that the implementation of the proposed development would bring about change within the surroundings of this designated asset, it is concluded that it would not represent a harmful loss of significance. This is because the implementation of the proposals would not result in a loss of (or reduction in) the relationships between this historic park and garden and its wider surrounding environment that contribute in a positive way to its overall significance”.*

- 6.6.11 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** at the operational stage.

### **Mathern Conservation Area**

- 6.6.12 Paragraphs 5.31 to 5.34 of **Appendix 6.1** identify and assess the nature and magnitude of indirect impacts on the significance of this conservation area through the implementation of the Proposed Scheme and in respect of changes within its setting.

- 6.6.13 Paragraph 5.33 specifically identifies the measures which have been factored into the design process to positively respond to the setting and significance of this designated historic asset in the preparation and finalisation of the Proposed Scheme, with the preceding paragraph (5.32) setting out this assessment:

*“For similar reasons to those set out above (paragraphs 5.28 to 5.30) in relation to Wyelands RPG...it is determined that the implementation of the proposed development would not give rise to a loss of this designated asset’s significance even if it is considered that there would be a change within its setting. This is on the basis that nothing within the site is considered to add to or amplify the aspects of the conservation area that underpin its special interest and justify the designation of this large area of fairly standard and commonplace enclosed farmland around the three historic settlements sited in the centre and south west”.*

- 6.6.14 As concluded in paragraph 5.34 of **Appendix 6.1**, insofar as the setting of this conservation area contributes to its heritage significance, this would be left undiminished and unharmed by the Proposed Scheme’s implementation.
- 6.6.15 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of medium sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** at the operational stage.

### **Mounton House Grade II\* RPG [PGW(Gt)8(MON)]**



- 6.6.16 Paragraphs 5.35 to 5.40 of **Appendix 6.1** identify and assess the nature and magnitude of indirect impacts on the significance of this Grade II\* RPG through the implementation of the Proposed Scheme and in terms of changes within its setting.
- 6.6.17 The final paragraph (5.40) concludes that *“...while it is possible that the implementation of the proposed development would give rise to a change within Mounton House RPG’s wider setting, there is no reason to believe or expect that this would represent a loss of (or damage to) its significance given the absence of any functional inter-relationships and the limited visual relationship beyond and across a wide strip of agricultural farmland. It is concluded that there would be no adverse impact and no harm to this asset.”*
- 6.6.18 In terms of the application of the criteria in **Tables 6.1, 6.2 and 6.3** (above), this is an asset of high sensitivity, there would be no change through the implementation of the Proposed Scheme and this would also therefore result in there being **no change** at the operational stage.

### Further Mitigation

- 6.6.19 There are no additional mitigation measures which can be applied and implemented to either eliminate or minimise the indirect effect of the Proposed Scheme on the significance of the Grade II listed St. Lawrence House following completion and at the Operational Stage. As a result, no measures are proposed.
- 6.6.20 No additional mitigation measures (over and above those inherent in the design of the Proposed Scheme) are either necessary or warranted in respect of the other historic assets which are identified as potentially sensitive heritage receptors in the preceding sections.

### Future Monitoring

- 6.6.21 There is no specific monitoring required in terms of the ‘indirect’ effect of the Proposed Scheme on the significance of the Grade II listed St. Lawrence House following its completion and as a consequence, no monitoring is put forward or proposed.
- 6.6.22 However, it is expected that a Landscape and Ecological Management Plan (LEMP) or some other form of targeted management plan will be drawn up, agreed and implemented in response to a condition of outline planning permission being granted and to secure (first) the delivery and then (second) the long term management of the landscaping and Public Open Space (POS) which forms part of the Proposed Scheme (extending to the replacement of any failures where relevant and necessary).
- 6.6.23 Whilst the future monitoring and maintenance of the POS and associated landscaping is not specific to the identification or mitigation of the operational phase effect on the Grade II listed St. Lawrence House, it would nevertheless ensure that effects on the significance of this designated historic asset as a result of changes within its setting are minimised as far as possible moving forwards over the long term.





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## Accidents/Disasters

- 6.6.24 In view of their spatial separation from the site, it is considered highly unlikely that accidents or disasters resulting from construction activities within its boundaries would have the potential to adversely impact upon the conservation of the physical form and fabric of any of the historic assets which are identified as representing potentially sensitive heritage receptors.

## Potential Changes to the Assessment as a Result of Climate Change

- 6.6.25 In light of the assessment above (in paragraphs 6.3.26 to 6.3.28); whereby there is no reason to believe or expect that the site will not continue to be used and managed as agricultural farmland even if the effects of climate change determine that pastoral grazing is not viable and there is a requirement to amend the species composition of the plantation woodlands and hedgerows to maintain their effectiveness; the identification and assessment of potentially significant effects to historic assets is still considered to be accurate and robust as a result.
- 6.6.26 Accordingly, there is no reason to believe or expect that the identification and assessment of potentially significant effects needs to be revised or amended to respond to and address the potential effects of climate change, more so given that those effects for the historic environment are not clear or certain.

## 6.7 Assessment of Cumulative Effects

- 6.7.1 Appropriate consideration has been given to the sites and projects in the surrounding area which could potentially give rise to cumulative effects in combination with the Proposed Scheme and assessment made of the potential nature and significance of any cumulative effects arising in terms of historic assets.
- 6.7.2 Having undertaken that process, it is concluded that there would be no cumulative or in-combination effects in terms of those heritage receptors assessed as being potentially affected by the Proposed Scheme and the sites in the Proposed Scheme's surroundings identified for cumulative assessment. This conclusion is applicable to both the 'construction' phase and 'operational' phase of the Proposed Scheme and so as a result, no additional mitigation measures are either necessary or proposed.

## 6.8 Inter-relationships

- 6.8.1 It is assessed that there are potential inter-relationships between the identification and assessment of potentially significant effects on historic assets in this chapter and the identification and assessment of potentially significant effects on ecology (chapter 4) and landscape and visual character (chapter 5).



- 6.8.2 These inter-relationships specifically focus on the design, implementation and management of the POS and landscaping around the edges of the Proposed Scheme and particularly in the north-western corner and in proximity to St. Lawrence House Grade II listed building.
- 6.8.3 As set out in paragraph 6.6.22 (above), it is expected that the design, delivery and future maintenance of the POS and landscaping will be identified and secured by the preparation and agreement of a LEMP or similar document to address and fulfil a condition imposed on the grant of outline planning permission.

## 6.9 Summary of Effects

- 6.9.1 The effects identified as arising from the construction and completion/operation of the Proposed Scheme, in terms of historic assets, are identified in **Table 6.4** below.

## 6.10 Conclusion

- 6.10.1 As far as 'key' conclusions are concerned, this assessment demonstrates that the Proposed Scheme would not give rise to a direct effect on a 'designated' historic asset (e.g. a listed building) either during construction or following completion because the site does not contain any such assets and is not located within the boundary (either wholly or in part) of such an asset.
- 6.10.2 It also concludes that, insofar as 'indirect' effects are concerned, the implementation of the Proposed Scheme would have a **minor adverse** impact on a single designated historic asset; this being St. Lawrence House Grade II listed building to the north of its boundary.
- 6.10.3 This would result from changes within its setting, which would first begin to emerge during construction but come fully to fruition upon completion of the Proposed Scheme, and result in a loss of that portion of its significance drawn from its setting.
- 6.10.4 As all of the asset's significance is held in its physical form and fabric, and much of the smaller portion that is drawn from its setting would remain unaffected and undiminished by the completion of the Proposed Scheme, the significance of effect is assessed as being 'minor adverse' and permanent, with no additional mitigation possible beyond the measures inherent to the Proposed Scheme. This long term effect following completion is 'not significant' in terms of the EIA Regulations (2017).
- 6.10.5 None of the other 'designated' historic assets located in the site's surroundings and identified as being potentially sensitive receptors in terms of the approval and implementation of the Proposed Scheme are assessed as receiving adverse effects (significant or otherwise) either during construction or following completion and then during operation.



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## 6.11 References

- 6.11.1 Cadw 2017a *Heritage Impact Assessment in Wales*
- 6.11.2 Cadw 2017b *Setting of Historic Assets in Wales*



Table 6.4: Summary of Likely Environmental Effects on Historic Assets

Receptor	Sensitivity of receptor	Description of impact	Short / medium / long term	Magnitude of impact	Significance of effect	Significant / Not significant	Notes
<b>Construction phase</b>							
St. Lawrence House Grade II listed building	High	Changes within its setting	Short term	No change	No change	Not significant	
Wyelands House Grade II RPG	High	Changes within its setting	Short term	No change	No change	Not significant	
Mathern Conservation Area	Medium	Changes within its setting	Short term	No change	No change	Not significant	
Mounton House Grade II* RPG	High	Changes within its setting	Short term	No change	No change	Not significant	
<b>Operational phase</b>							
St. Lawrence House Grade II listed building	High	Changes within its setting	Long term	Small	Minor adverse	Not significant	
Wyelands House Grade II RPG	High	Changes within its setting	Long term	No change	No change	Not significant	
Mathern Conservation Area	Medium	Changes within its setting	Long term	No change	No change	Not significant	
Mounton House Grade II* RPG	High	Changes within its setting	Long term	No change	No change	Not significant	